

21 July 2008

Joel Farina
Adviser, Issuers (Sydney)
ASX Limited
PO Box H224
Australia Square NSW 1215

Dear Mr Farina,

Re: Inventis Limited (the “Company”) ~ Appendix 3Y – Change of Director’s Interest Notice.

Reference is made to your letter dated 18 July 2008 and our subsequent telephone conversations in relation to the lodgement of Appendix 3Y for Mr David Richards.

As advised, during an internal Risk Management and Corporate Governance Audit Process, we identified that there are three (3) appendix 3Y not lodged for one of our Alternate Directors. We have since lodged all three with ASX; two on 17 July 2008 and the third today, which was subsequent to confirmation by the Director concerned.

In response to the matters raised by you, we say as follows:

1. **Late lodgement:** We confirm that:
 - a. All of the appendices relate to the same Alternate Director;
 - b. The Company via email dated 14 March 2008 had informed the Director of his responsibility to advise the Company of any change in his interests within 5 business days of a change taking place;
 - c. The Director did not inform the Company within the prescribed time; and
 - d. The breach was identified on 17 July 2008 and corrective action was taken as soon as practicable. Two were lodged on the same day; and the other lodged within two (2) business days.
2. **Current Arrangements in place:** Although the Company has a Deed of Indemnity, Access and Disclosure with each of the directors, it does not have such an arrangement with alternate directors.

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3. Additional steps the Company intends to take to ensure compliance with listing rule 3.19B: The Company has identified the non-disclosure in the change of interest by directors including alternate directors as a risk under its Risk Management Strategy Process and to mitigate the risk, the Company has taken the following further measures:

- a. All directors including alternate directors have been made aware of the ASX Listing Update released on 27 June 2008;
- b. The Company will execute a Deed of Indemnity, Access and Disclosure with the alternate directors as well;
- c. The Company will inform the Directors that they are responsible to ensure that their alternates disclose their change in interests to them within 5 business days of such change; and
- d. At Board Meeting from this point on, the disclosure of conflict of interest shall be expanded to include the disclosure by each of the directors of their change in interest since last Board meeting. The directors will also be required to disclose for their respective alternates as well.

We trust that the rationale and additional steps undertaken by the Company is in line with your expectations.

Yours sincerely,



Renuka Bhardwaj
Company Secretary

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ASX

AUSTRALIAN SECURITIES EXCHANGE

18 July 2008

Ms Renuka Bhardwaj
Company Secretary
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Dear Renuka

**Inventis Limited (the "Company")
Appendix 3Y – Change of Director's Interest Notice**

We refer to the following;

1. The two Appendix 3Ys lodged by the Company with ASX Limited ("ASX") on 17 July 2008 for Mr David Alexander Richards (the "Appendices");
2. Listing rule 3.19A.2 which requires an entity to tell ASX the following:

A change to a notifiable interest of a director of the entity (or in the case of a trust, a director of the responsible entity of the trust). The entity must complete Appendix 3Y and give it to ASX no more than 5 business days after the change occurs.

3. Listing rule 3.19B which states as follows.

An entity must make such arrangements as are necessary with a director of the entity (or in the case of a trust, a director of the responsible entity of the trust) to ensure that the director discloses to the entity all the information required by the entity to give ASX completed Appendices 3X, 3Y and 3Z within the time period allowed by listing rule 3.19.A. The entity must enforce the arrangements with the director.

4. The Companies Update dated 27 June 2008, reminding listed entities of their obligation to notify ASX within 5 business days of the notifiable interests in securities held by each director and outlining the action that ASX would take in relation to breaches of listings rules 3.19A and 3.19B.

The Appendices indicate that a change in Mr Richards' notifiable interest occurred on 26 March 2008 and 3 July 2008. It appears that the Appendices should have been lodged with ASX by 2 April 2008 and 10 July 2008 respectively. Consequently, the Company may be in breach of listing rules 3.19A and/or 3.19B. It also appears the director concerned may have breached section 205G of the *Corporations Act 2001* (Cth).

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Please note that ASX is required to record details of breaches of the listing rules by listed companies for its reporting requirements.

ASX reminds the Company of its contract with ASX to comply with the listing rules. In the circumstances ASX considers that it is appropriate that the Company make necessary arrangements to ensure there is not a reoccurrence of a breach of the listing rules.

Having regard to listing rules 3.19A and 3.19B and Guidance Note 22: "Director Disclosure of Interests and Transactions in Securities - Obligations of Listed Entities", we ask that you answer each of the following questions:

1. Please explain why the Appendices were lodged late.
2. What arrangements does the Company have in place with its directors to ensure that it is able to meet its disclosure obligations under listing rule 3.19A?
3. If the current arrangements are inadequate or not being enforced, what additional steps does the Company intend to take to ensure compliance with listing rule 3.19B?

Your response should be sent to me by e-mail at joel.farina@asx.com.au or by facsimile on facsimile number (02) 9241 7620. It should not be sent to the Company Announcements Office.

A response is requested as soon as possible and, in any event, not later than half an hour before the start of trading (ie before 9.30 a.m. A.E.S.T.) on Wednesday, 23 July 2008.

Under listing rule 18.7A, a copy of this query and your response will be released to the market, so your response should be in a form suitable for release and should separately address each of the questions asked. If you have any queries or concerns, please contact me immediately.

Yours sincerely

[Sent electronically without signature]

Joel Farina

Adviser, Issuers (Sydney)

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