17 February 2016

Mr Andrew Kabega
Adviser
ASX Compliance Pty Limited
20 Bridge Street
Sydney NSW 2000

Dear Andrew,

We refer to your letter dated 16 February 2016 concerning the lodgment of an Appendix 3Y for Mr Howard Digby and Mr Ray Shorrocks, directors of Estrella Resources Limited.

The following are answers to the questions raised in your letter.

1. Please explain why the Appendix 3Y was lodged late.

The Appendix 3Y for Mr Howard Digby was lodged late due to an oversight by the Company Secretary.

The Appendix 3Y for Mr Howard Digby was lodged post a one for four share consolidation. At the same time the opportunity was taken to lodge a further Appendix 3Y for Mr Ray Shorrocks on a post consolidation basis notwithstanding that there had been no change in Mr Shorrocks underlying interests, and hence no obligation to announce an appendix 3Y for Mr Shorrocks.

2. What arrangements does the Company have in place under listing rule 3.19B with its directors to ensure that it is able to meet its obligations under listing rule 3.19A.

The Company requires its directors to disclose all information required by the Company in relation to:

(a) the notifiable interests of a director on the date that director is appointed;

(b) any change to a notifiable interest of that director; and

(c) the notifiable interests of a director when that director ceases to be a director of the Company,

Office Address Suite 1503B Level 15, 1 Alfred Street New South Wales 2000 Australia Postal Address PO Box R933 Royal Exchange New South Wales 1225 Australia Phone +61 2 9078 7671 Email info@estrellaresources.com.au

immediately following the occurrence of the event to enable the Company to comply with LR3.19A.

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 3.19B.

The Company considers current arrangements are adequate.

Yours sincerely,



Guy Robertson
Company Secretary

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16 February 2016

Guy Robertson
Company Secretary
Estrella Resources Limited
Level 15, 1 Alfred Street
Sydney NSW 2000

By Email

Dear Mr Robertson

ESTRELLA RESOURCES LIMITED (the "Company")

We refer to the following:

1. The following announcements lodged by the Company with ASX Limited ("ASX"):

    - The Appendices 3Y for Mr Howard Digby and Mr Raymond Shorrocks lodged on 18 January 2016 (the "Appendices 3Y").

2. Listing rule 3.19A which requires an entity to tell ASX the following:

    3.19A.1 *The notifiable interests of a director of the entity (or in the case of a trust, a director of the responsible entity of the trust) at the following times.*

    - *On the date that the entity is admitted to the official list.*
    - *On the date that a director is appointed.*

    The entity must complete Appendix 3X and give it to ASX no more than 5 business days after the entity's admission or a director's appointment.

    3.19A.2 *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) including whether the change occurred during a closed period where prior written clearance was required and, if so, whether prior written clearance was provided. The entity must complete Appendix 3Y and give it to ASX no more than 5 business days after the change occurs.*

    3.19A.3 *The notifiable interests of a director of the entity (or in the case of a trust, a director of the responsible entity of the trust) at the date that the director ceases to be a director. The entity must complete Appendix 3Z and give it to ASX no more than 5 business days after the director ceases to be a director.*

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.

The Appendices 3Y for Mr Shorrocks and Mr Digby indicate that a change in their notifiable interests occurred on 18 and 25 September 2015. It appears that the Appendices 3Y should have been lodged with ASX by 25 September 2015 and 2 October 2015 respectively. Consequently, the Company may be in breach of listing rules 3.19A and/or 3.19B.

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 3Y 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 or by facsimile on facsimile number (02) 9241 7620. It should not be sent to the Market Announcements Office.

A response is requested as soon as possible and, in any event, **not later than close of business 5.00 pm. A.E.D.T. on Thursday, 18 February 2016.**

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]

Andrew Kabega
Senior Adviser, Listings Compliance (Sydney)