S&P/ASX Index Consultation:

New Zealand and PNG Secondary Listings on

ASX and Index Eligibility

October 2010

JOINT S&P / ASX

Disclaimer:

The information contained in this consultation paper (the "Paper") is for the purposes of conducting a market survey only. It does not constitute investment and/or financial product advice. You should consider obtaining independent advice before making any investment and/or financial decisions.

Neither ASX, ASX's directors, officers, agents, employees, or contractors ("ASX Personnel"), nor Standard & Poor's, Standard & Poor's directors, officers, agents, employees or contractors ("S&P Personnel") give any representation or warranty as to the reliability, accuracy or currency of the information contained in the Paper.

To the extent permitted by law, neither ASX, ASX Personnel, Standard & Poor's, S&P Personnel, shall be liable for, or responsible for, any losses, damages, costs, expenses or claims arising in any way (including by way of negligence) from anyone taking an action (or failing to act) based on, or in reliance on, the Paper or any information or material arising from or incidental to the Paper, whether in writing or otherwise.

Any reference to "ASX" means "ASX Limited", "ASX Operations Pty Limited" and all other related bodies corporate.

Any reference to "S&P" or "Standard & Poor's" means "Standard & Poor's, a division of The McGraw-Hill Companies, Inc." and all of its affiliates.

All currency values are in Australian dollars unless otherwise stated.

© copyright 2010 Standard & Poor's, a division of The McGraw-Hill Companies, Inc, ASX Operations Pty Limited ABN 42 004 523 782 (ASXO). All rights reserved. This publication should not be reproduced, stored in a retrieval system or transmitted in any form, whether in whole or in print, without the prior written consent of Standard & Poor's and ASXO.

Background Information

This consultation paper assumes that readers are familiar with the S&P/ASX Index suite and the methodology relating to index eligibility. Background information on the S&P/ASX index suite can be obtained from the Standard and Poor's website at <u>www.standardandpoors.com</u>.

Proposal

To change the index treatment of New Zealand (NZ) and Papua New Guinea (PNG) domiciled companies such that for index eligibility purposes, NZ and PNG companies will be subject to the same domicile test as all other ASX companies.

The index methodology contains a test of domicile that, among other characteristics, has regard to the market upon which the majority of trading in a cross-listed company's securities takes place. Currently this test is not applied to NZ and PNG companies and they are automatically classified as "domestic" for index purposes. The importance of domicile status is that it determines the number of quoted securities taken into account for index ranking and liquidity purposes.

The alignment of NZ and PNG companies for index eligibility purposes will ensure a consistent approach in maintaining existing constituents and determining index eligibility for potential index constituents.

Background

Under the index methodology, a company is considered to be "domestic" if:

- The company is incorporated in Australia and traded on the ASX; or
- The company is incorporated overseas but has an exclusive listing on the ASX; or

• The company is incorporated overseas and is traded on other overseas markets, but most of the trading activity occurs on the ASX.

Generally "a foreign-domiciled" company is a company that is:

- Incorporated overseas; and/or
- · Listed on one or more overseas markets; and
- Has the majority of its trading activity occurring on an overseas exchange.

However, all ASX listed New Zealand (NZ) and Papua New Guinea (PNG) domiciled companies are treated as "domestic" for index purposes.

While companies classified as foreign-domiciled are eligible for inclusion in the majority of S&P/ASX indices (with the exception of S&P/ASX All Australian 50 and the S&P/ASX All Australian 200) there is a key difference in their treatment vis-à-vis domestic companies in relation to the quoted securities taken into account for index ranking and liquidity purposes.

For domestic companies, the number of Quoted Shares is the total number of Quoted Shares on issue, while for foreign companies the number represents the Australian shareholding component of the company's issued shares (usually the number of CHESS Depository Interests (CDIs) on issue).

The number of Quoted Shares is relevant to both the calculation of market capitalisation (which determines index ranking) and the calculation of liquidity. For foreign companies, market capitalisation ranking is lower than it would be if total issued capital were used because only the Australian shareholding component of the company's issued shares is taken into account in the calculation. Similarly the measurement of liquidity is based on the relativity between turnover in the Australian market (rather than total global turnover) and the Australian market capitalisation (based on the Australian shareholding component of the company's issued shares).

Index Consultation

The automatic treatment of NZ and PNG domiciled companies as "domestic" produces the anomalous result that:

- Market capitalisation (and accordingly index ranking) can be overstated because the total issued share count rather than just the Australian component of the share count is used in the determination.
- Australian market liquidity can be understated because liquidity is measured on the basis of Australian market turnover relative to total market capitalisation (rather than Australian capitalisation only).

Implications of Change

Adoption of the proposed methodology change will result in a Market Capitalisation calculation that is based on the number of securities on the Australian register of NZ and PNG domiciled companies and Liquidity that will be measured on Australian market trading volume relative to the companies' Australian market capitalisation.

The impact of the change will vary according to the companies' circumstances. For NZ and PNG companies that have most of their trading activity occurring on ASX there is likely to be no change. For those that will be reclassified as foreign domiciled (because the majority of their trading activity occurs on their overseas market), and whose issued capital on the Australian register represents less than their total issued capital, it is likely that for the purpose of index inclusion eligibility a lower Market Capitalisation ranking determination will be made. On the other hand, it is possible that a higher Relative Liquidity determination will be the result.

ASX	Company Name	Place of Incorporation
Code		-
AIZ	AIR NEW ZEALAND LIMITED	NZ
AIA	AUCKLAND INTERNATIONAL AIRPORT LIMITED	NZ
DSQ	DATASQUIRT LIMITED	NZ
FPA	FISHER & PAYKEL APPLIANCES HOLDINGS LIMITED	NZ
FPH	FISHER & PAYKEL HEALTHCARE CORPORATION LIMITED	NZ
FBU	FLETCHER BUILDING LIMITED	NZ
GEN	GENESIS RESEARCH AND DEVELOPMENT CORPORATION LIMITED	NZ
HTM	HERITAGE GOLD NZ LIMITED	NZ
IFZ	INFRATIL LIMITED	NZ
KMD	KATHMANDU HOLDINGS LIMITED	NZ
KSO	KING SOLOMON MINES LIMITED	NZ
LME	L&M ENERGY LIMITED	NZ
NEU	NEUREN PHARMACEUTICALS LIMITED	NZ
NZO	NEW ZEALAND OIL & GAS LIMITED	NZ
NOC	NORTHERN CREST INVESTMENTS LIMITED	NZ
NPX	NUPLEX INDUSTRIES LIMITED	NZ
PRC	PIKE RIVER COAL LIMITED	NZ
SKC	SKY CITY ENTERTAINMENT GROUP LIMITED	NZ
SKT	SKY NETWORK TELEVISION LIMITED	NZ
TEL	TELECOM CORPORATION OF NEW ZEALAND LIMITED	NZ
TWR	TOWER LIMITED	NZ
WHS	WAREHOUSE GROUP LIMITED (THE)	NZ
BOC	BOUGAINVILLE COPPER LIMITED	PNG
HIG	HIGHLANDS PACIFIC LIMITED	PNG
OSH	OIL SEARCH LIMITED	PNG
PRE	PACRIM ENERGY LIMITED	PNG
QIL	QUOIN (INT) LIMITED	PNG
SST	STEAMSHIPS TRADING COMPANY LIMITED	PNG

ASX listed companies with NZ and PNG as their place of incorporation are as follows:

Index Consultation

No suggestion is being made regarding the index eligibility of the companies listed above should the proposed methodology change take place. NZ and PNG companies will still be required to meet all the standard index inclusion criteria in the S&P Index methodology such as liquidity and capitalisation.

Next Steps

S&P and ASX invite submissions to this consultation paper from index stakeholders. Respondents are invited to comment on the feasibility of the proposal and specifically any issues not detailed in this document that may impair efficient index management.

Submissions should be lodged not later than 30 November 2010.

Submissions can be addressed to either Jesse Stewart or Brian Goodman at the contact details provided below. If you wish to arrange a face-to-face consultation, please contact either party.

Standard & Poor's Index Services	ASX Limited	
Jesse Stewart	Brian Goodman	
Index Manager	Product Development Manager	
Level 27	Exchange Centre	
259 George Street	20 Bridge Street	
Sydney NSW 2000	Sydney NSW 2000	
Telephone: (61) 2 9255 9874	Telephone: (61) 2 9227 0106	
E-mail:	E-mail:	
jesse_stewart@standardandpoors.com	brian.goodman@asx.com.au	