

TO THE CREDITOR AS ADDRESSED

25 August 2020

Dear Sir/Madam

**Virgin Australia Holdings Limited (ACN 100 686 226)  
and the subsidiaries listed in Annexure A  
(All Administrators Appointed)  
(the Companies)**

I refer to my appointment as Joint and Several Administrator of the Companies, together with Vaughan Strawbridge, Sal Algeri and John Greig.

I also refer to the Report to Creditors dated 25 August 2020.

We have identified a factual inaccuracy in the report as follows:

- On page 58 we stated that:

*"We have asked the directors whether they would seek to rely on a safe harbour defence in the event we concluded the Companies traded while insolvent. A response was received on 18 August 2020 from the Directors of VAIH, VAIA, VSEA and Tiger1.*

We also received a response from the Directors of the balance of the entities listed in Annexure A under administration on 19 August 2020.

- On page 71 we stated that:

*"In addition to relying upon section 588GAAA, the Directors of VAIH, VAIA, VSEA and Tiger 1 have foreshadowed that, if necessary (and they deny that it is necessary), they would avail themselves of all grounds of defence available to them in respect to any action for trading the Group while insolvent. We have not at the time of writing this report received an indication from the Directors of the other Virgin Group companies as to reliance upon available defences, but we speculate that their response will be similar if not the same as that of the Directors of VAIH, VAIA, VSEA and Tiger 1. Section 588GA contains safe harbour defences the Directors may seek to rely on. That provision pre-dates and is unrelated to COVID-19."*

and

*"As stated, the position of the Directors of VAIH, VAIA, VSEA and Tiger 1 is that safe harbour protection was not needed, because they take the view that VAIH, VAIA, VSEA and Tiger 1 were not insolvent at any time prior to the appointment of administrators. Given what is stated above, we do not share that view, believing the Group was insolvent from 22 March 2020 at the latest".*

We note that the response received on 19 August 2020 is similar in all respects to the letter received on 18 August 2020 from the Directors of VAIH, VAIA, VSEA and Tiger1.

Should you have any queries on the above or regarding our report dated 25 August 2020, please email us at: [virginadmin@deloitte.com.au](mailto:virginadmin@deloitte.com.au).

Yours faithfully

A handwritten signature in black ink, appearing to be 'V. Strawbridge', written over a horizontal line.

**Vaughan Strawbridge**  
Joint and Several Administrator

## Annexure A

No.	Name	Date of appointment of voluntary administrators	ACN	Abbreviation
1	Virgin Australia Holdings Ltd	20-Apr-20	ACN 100 686 226	VAH
2	Virgin Australia Airlines Pty Ltd	20-Apr-20	ACN 090 670 965	VAA
3	Virgin Australia International Airlines Pty Ltd	20-Apr-20	ACN 125 580 823	VAIA
4	Virgin Australia Regional Airlines Pty Ltd	20-Apr-20	ACN 008 997 662	VARA
5	Tiger Airways Australia Pty Limited	20-Apr-20	ACN 124 369 008	Tiger
6	737 2012 No. 2 Pty Ltd	20-Apr-20	ACN 154 225 064	737 20122
7	737 2012 No.1 Pty. Ltd.	20-Apr-20	ACN 154 201 859	737 20121
8	A.C.N. 098 904 262 Pty Ltd	20-Apr-20	ACN 098 904 262	ACN 098 904 262
9	Short Haul 2014 No. 1 Pty Ltd	20-Apr-20	ACN 600 809 612	SH20141
10	Short Haul 2014 No. 2 Pty Ltd	20-Apr-20	ACN 600 878 199	SH20142
11	Short Haul 2016 No. 1 Pty Ltd	20-Apr-20	ACN 612 766 328	SH20161
12	Short Haul 2016 No. 2 Pty Ltd	20-Apr-20	ACN 612 796 077	SH20162
13	Short Haul 2017 No. 1 Pty Ltd	20-Apr-20	ACN 617 644 390	SH20171
14	Short Haul 2017 No. 2 Pty Ltd	20-Apr-20	ACN 617 644 443	SH20172
15	Short Haul 2017 No. 3 Pty. Ltd.	20-Apr-20	ACN 622 014 813	SH20173
16	Short Haul 2018 No. 1 Pty. Ltd.	20-Apr-20	ACN 622 014 831	SH20181
17	Tiger International Number 1 Pty Ltd	28-Apr-20	ACN 606 131 944	Tiger 1
18	VA Borrower 2019 No. 1 Pty Ltd	20-Apr-20	ACN 633 241 059	VA20191
19	VA Borrower 2019 No. 2 Pty Ltd	20-Apr-20	ACN 637 371 343	VA20192
20	VA Hold Co Pty Ltd	20-Apr-20	ACN 165 507 157	VA Holdco
21	VA Lease Co Pty Ltd	20-Apr-20	ACN 165 507 291	VA Leaseco
22	VA Regional Leaseco Pty Ltd	20-Apr-20	ACN 127 491 605	VARL
23	VAH Newco No.1 Pty Ltd	20-Apr-20	ACN 160 881 345	VAH Newco 1
24	VB 800 2009 Pty Ltd	20-Apr-20	ACN 135 488 934	VB 800
25	VB Leaseco No 2 Pty Ltd	20-Apr-20	ACN 142 533 319	VB Leaseco2
26	VB Leaseco Pty Ltd	20-Apr-20	ACN 134 268 741	VB Leaseco
27	VB LH 2008 No. 1 Pty Ltd	20-Apr-20	ACN 134 280 354	VLH20081
28	VB LH 2008 No. 2 Pty Ltd	20-Apr-20	ACN 134 288 805	VLH20082
29	VB PDP 2010-11 Pty Ltd	20-Apr-20	ACN 140 818 266	VB PDP
30	VB Ventures Pty Ltd	20-Apr-20	ACN 125 139 004	VB Ventures
31	VBNC5 Pty Ltd	20-Apr-20	ACN 119 691 502	VBNC5
32	Virgin Australia 2013-1 Issuer Co Pty Ltd	20-Apr-20	ACN 165 507 326	VA20131
33	Virgin Australia Airlines (SE Asia) Pty Ltd	20-Apr-20	ACN 097 892 389	VSEA
34	Virgin Australia Airlines Holdings Pty Ltd	20-Apr-20	ACN 093 924 675	VAAH
35	Virgin Australia Cargo Pty Ltd	20-Apr-20	ACN 600 667 838	VAC
36	Virgin Australia Holidays Pty Ltd	20-Apr-20	ACN 118 552 159	VA Holidays

<b>No.</b>	<b>Name</b>	<b>Date of appointment of voluntary administrators</b>	<b>ACN</b>	<b>Abbreviation</b>
37	Virgin Australia International Holdings Pty Ltd	20-Apr-20	ACN 155 860 021	VAIO
38	Virgin Australia International Operations Pty Ltd	20-Apr-20	ACN 155 859 608	VAIH
39	Virgin Tech Pty Ltd	20-Apr-20	ACN 101 808 879	VT
40	VB Investco Pty Ltd	3-Aug-20	ACN 101 961 095	VB Investco
41	VAH Newco No.2 Pty Ltd	3-Aug-20	ACN 160 881 354	VAH Newco 2