

15 April 2019

Mr Adrian Smythe  
Manager, Listings Compliance (Sydney)  
Australian Stock Exchange  
20 Bridge Street  
Sydney NSW 2000

Dear Adrian,

We refer to your letter dated 10 April 2019 – Appendix 3Z – Final Director's Interest Notice Query

1. The Appendix 3Z – Final Director's Interest Notice, was lodged past the due day of 5 April 2019 due to an administrative oversight.
2. The Company is aware of its obligations under ASX Listing Rules 3.19A and 3.19B. Specific processes are in place to ensure that the Company satisfies its obligations to disclose the notifiable interests of each director on their appointment to the Board, on any change in their notifiable interest, and on their retirement from the Board.
3. The Company has involved two additional personnel within its administrative departments to monitor and report on the Directors' notifiable interests in accordance with ASX Listing Rules 3.19A and 3.19B in a timely manner.

Yours sincerely



Brent Hofman  
Local Agent

**About Axiom Mining Limited**

Axiom Mining Limited focuses on tapping into the resource potential within the mineral-rich Pacific Rim. Through dedication to forging strong bonds and relationships with the local communities and governments where we operate, Axiom Mining has built a diversified portfolio of exploration tenements in the Asia-Pacific region. This includes a majority interest in part of the Isabel Nickel Project in the Solomon Islands and highly prospective gold, silver and copper tenements in Solomon Islands and North Queensland, Australia. Axiom Mining is listed on the ASX. For more information on Axiom Mining, please visit [www.axiom-mining.com](http://www.axiom-mining.com)

**Disclaimer**

Statements in this document that are forward-looking and involve numerous risk and uncertainties that could cause actual results to differ materially from expected results are based on the Company's current beliefs and assumptions regarding a large number of factors affecting its business, some of which may be outside the Company's control. There can be no assurance that (i) the Company has correctly measured or identified all of the factors affecting its business or their extent or likely impact; (ii) the publicly available information with respect to these factors on which the Company's analysis is based is complete or accurate; (iii) the Company's analysis is correct; or (iv) the Company's strategy, which is based in part on this analysis, will be successful.



10 April 2019

Mr Brent Hofman  
Group Finance Manager & Local Agent  
Axiom Mining Limited  
Level 6  
15 Astor Terrace  
Brisbane QLD 4000

By email

Dear Mr Hofman

**Axiom Mining Limited ('AVQ'): Appendix 3Z – Final Director's Interest Notice Query**

ASX refers to the following:

1. AVQ's Appendix 3Z lodged on the ASX Market Announcements Platform ('MAP') on 10 April 2019 for Mr Robert Barraket (the 'Notice');
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 that:

*'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.'*

As the Appendix 3Z indicated that Mr Barraket ceased to be a director of AVQ on 29 March 2019, it appears that the Appendix 3Z should have been lodged with ASX by 5 April 2019. As it was lodged on 10 April 2019, it appears that AVQ may have breached 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 entities for its reporting requirements.

ASX reminds AVQ of its contract with ASX to comply with the Listing Rules.

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### Request for Information

Under Listing Rule 18.7, we ask that you answer each of the following questions 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*.

1. Please explain why the Appendix 3Z was lodged late.
2. What arrangements does AVQ have in place under Listing Rule 3.19B 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 AVQ intend to take to ensure compliance with Listing Rule 3.19B?

### When and where to send your response

Your response should be sent to me by e-mail at [ListingsComplianceSydney@asx.com.au](mailto:ListingsComplianceSydney@asx.com.au). It should not be sent to the ASX Market Announcements Office.

A response is requested as soon as possible and, in any event, no later than half an hour before the start of trading (i.e. before **9:30 am AEST**) on **Monday, 15 April 2019**.

Under Listing Rule 18.7A, a copy of this letter and your response will be released to the market, so your response should be in a form suitable for release and must separately address each of the questions asked.

### Enquiries

If you have any queries or concerns about any of the above, please contact me immediately.

Yours sincerely

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**Adrian Smythe**  
Manager, Listings Compliance (Sydney)