

28 October 2014

Company Announcements  
Australian Securities Exchange limited

**Director's Appendix 3Y – Late Lodgement**

I refer to your letter dated 24 October 2014 in relation to a recently lodged Appendix 3Y – Change in Directors Interest Notice and to the queries ASX has raised.

The notice related to several trades and the first of which was dated 15 October. The query from the ASX states that the notice should have been lodged by 22<sup>nd</sup> October but the notice was lodged prior to the market opening on 23<sup>rd</sup> October.

In relation to the late lodgement of the Appendix 3Y I advise that:

1. The three trades referred to in the notice took place on the Toronto Stock Exchange and not on the ASX. The dates referred to on the Appendix 3Y were the dates that the trades took place in Canada. Canada is 15 hours behind AEST. While the date of the trade was shown as the 15<sup>th</sup> October, because of the time difference, from an Australian perspective I considered the 5 business days to commence from the following day. The internal procedures for lodgement of Appendix 3Y's has been upgraded and in future this will ensure that Appendix 3Y's are lodged within the correct timeframe.
2. The Company has informed all Directors of the disclosure requirements set out in listing rule 3.19A. In addition the Company policy on trading securities of the company states the need to provide details of share transactions to allow compliance with ASX listing rules.
3. The internal timeframe procedures for lodgement of Appendix 3Y's has been upgraded and in future this will ensure that Appendix 3Y's are lodged within the correct timeframe. The Company believes that the procedures which are now in place are sufficient to ensure timely compliance with listing rule 3.19A.

Evan Hughes  
General Manager - Australia



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24 October 2014

Evan Hughes  
Laramide Resources Ltd  
Level 4, 67 St Pauls Terrace  
Spring Hill QLD 4000

**By email: [evan.hughes@lcrpl.com.au](mailto:evan.hughes@lcrpl.com.au)**

Dear Evan

**Laramide Resources Limited (the “Company”)**

I refer to the following:

1. The Company’s announcement lodged with ASX Ltd (“ASX”) on 23 October 2014 regarding a change of director’s interest notice for Mr Marc Henderson (“Appendix 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 an 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). The entity must complete an 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 an 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.*

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.

As the Appendix 3Y indicates a change in Mr Henderson's notifiable interest occurred on 15 October 2014, the Appendix 3Y should have been lodged with the ASX by 22 October 2014. As the Appendix 3Y was lodged on 22 October 2014 it appears that 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 Appendix 3Y was 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 to Ben.Tippett@asx.com.au. 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 **3:00 pm WST on Wednesday 29 October 2014**.

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 must separately address each of the questions asked. If you have any queries or concerns, please contact me immediately.

Yours sincerely,

*[sent electronically without signature]*

Ben Tippett  
**Adviser, Listings Compliance (Perth)**