



4 January 2021

Ms Stephanie Patchell
Adviser, Listings Compliance (Perth)
Australian Securities Exchange
Level 40, Central Park
152-158 St Georges Terrace
PERTH WA 6000

By email: ListingsCompliancePerth@asx.com.au

Dear Ms Patchell

Redstone Resources Limited ('RDS' or 'the Company'): Appendix 3Y – Change of Director's Interest Notice Query

In response to your letter dated 30 December 2020, regarding the late lodgement of Change of Directors' Interest Notice's (Appendix 3Y's) for each of Mr Richard Homsany, Mr Edward van Heemst and Mr Brett Hodgins, Redstone Resources Limited responds as follows:

1. Please explain why the Appendix 3Y's were lodged late

The Appendix 3Y's were lodged late due to an administrative oversight by the Company following allotment of unquoted options to directors on 27 November 2020. The oversight was identified upon the requirement for a subsequent Appendix 3Y for the directors relating to the issue of placement shares, which was prepared and lodged with the Market Announcements Platform on 24 December 2020.

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

The Company has a Securities Trading policy in place with regards to changes in directors' interests and securities trading. All directors are made aware of their obligations with respect to securities trading and Listing Rule 3.19A.

The Company is aware of the timing deadlines set out in the Listing Rules and the Corporations Act and every endeavour is made to abide by these Rules.



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*

The Company has reviewed its processes and believes that its disclosure arrangements are adequate and that the administrative oversight in this instance has not affected the Company's arrangements for ensuring timely notification in accordance with the Listing Rules.

The Company believes that its current disclosure arrangements are adequate to ensure it is able to meet all future disclosure obligations pursuant to the ASX Listing Rules 3.19A and 3.19B.

Yours sincerely

Miranda Conti
Company Secretary



30 December 2020

Reference: 29289

Ms Miranda Conti
Company Secretary
Redstone Resources Limited

By email: mirandas@iinet.net.au

Dear Ms Conti

Redstone Resources Limited ('RDS'): Appendix 3Y – Change of Director's Interest Notice Query

ASX refers to the following:

1. RDS's:

- 1.1 Appendix 3Y lodged on the ASX Market Announcements Platform ('MAP') on 24 December 2020 for Mr Richard Homsany;
- 1.2 Appendix 3Y lodged on MAP on 24 December 2020 for Mr Edward van Heemst; and
- 1.3 Appendix 3Y lodged on MAP on 24 December 2020 for Mr Brett Hodgins, (together, the 'Notices').

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.'

The Notices indicate that changes in Mr Homsany's, Mr van Heemst's and Mr Hodgins' notifiable interests occurred on 27 November 2020. It appears that the Notices should have been lodged with ASX by 4 December 2020. Consequently, RDS may have breached Listing Rules 3.19A and/or 3.19B. It also appears that Mr Homsany, Mr van Heemst and Mr Hodgins may have breached section 205G of the *Corporations Act 2001* (Cth).

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 3Ys were lodged late.
2. What arrangements does RDS 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 RDS intend to take to ensure compliance with Listing Rule 3.19B?

When and where to send your response

This request is made under Listing Rule 18.7. Your response is required as soon as reasonably possible and, in any event, by no later than **3.00pm AWST on Wednesday, 6 January 2021**. You should note that if the information requested by this letter is information required to be given to ASX under Listing Rule 3.1 and it does not fall within the exceptions mentioned in Listing Rule 3.1A, RDS's obligation is to disclose the information 'immediately'. This may require the information to be disclosed before the deadline set out in the previous paragraph and may require RDS to request a trading halt immediately.

Your response should be sent to me by e-mail at ListingsCompliancePerth@asx.com.au. It should not be sent directly to the ASX Market Announcements Office. This is to allow me to review your response to confirm that it is in a form appropriate for release to the market, before it is published on the ASX Market Announcements Platform.

Trading halt

If you are unable to respond to this letter by the time specified above, you should discuss with us whether it is appropriate to request a trading halt in RDS's securities under Listing Rule 17.1. If you wish a trading halt, you must tell us:

- the reasons for the trading halt;
- how long you want the trading halt to last;
- the event you expect to happen that will end the trading halt;
- that you are not aware of any reason why the trading halt should not be granted; and
- any other information necessary to inform the market about the trading halt, or that we ask for.

We require the request for a trading halt to be in writing. The trading halt cannot extend past the commencement of normal trading on the second day after the day on which it is granted. You can find further information about trading halts in *Guidance Note 16 Trading Halts & Voluntary Suspensions*.

Suspension

If you are unable to respond to this letter by the time specified above, ASX will likely suspend trading in RDS's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

In responding to this letter, you should have regard to RDS's obligations under Listing Rules 3.1 and 3.1A and also to Guidance Note 8 *Continuous Disclosure*: Listing Rules 3.1 – 3.1B. It should be noted that RDS's obligation to disclose information under Listing Rule 3.1 is not confined to, nor is it necessarily satisfied by, answering the questions set out in this letter.

Release of correspondence between ASX and entity

We reserve the right to release a copy of this letter, your reply and any other related correspondence between us to the market under Listing Rule 18.7A.

Questions

If you have any questions in relation to the above, please do not hesitate to contact me.

Yours sincerely

Stephanie Patchell

Adviser, Listings Compliance (Perth)