

Suite 1, 6 Richardson Street West Perth Western Australia 6005

> Tel: +61 8 9226 0866 Fax: +61 8 9486 7375

PO Box 1559, West Perth Western Australia 6872

www.riedelresources.com.au

ABN: 91 143 042 022 ASX: RIE

7 June 2017

Mr Dale Allen ASX Compliance Pty Ltd (Perth) Level 40 Central Park 152-158 St Georges Terrace PERTH WA 6000

By email: Dale.Allen@asx.com.au

Dear Dale,

## **ASX RESPONSE LETTER - APPENDIX 3Y**

We have received your letter dated 2 June 2017 in relation to the late lodgement of the Change of Director's Interest Notice ('Appendix 3Y') for Mr Mark Skiffington and advise the following:

- 1. The Appendix 3Y was lodged late due to an administrative oversight. Upon discovery of this oversight, an Appendix 3Y was prepared and lodged immediately.
- 2. We are 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. The Company has developed a Securities Trading Policy to assist Directors and Officers to comply with their disclosure obligations. This Policy includes the requirement that all Directors must notify the Company Secretary of any dealings in the Company's securities immediately after any such dealings occur.
- 3. The administrative oversight has not affected the Company's current arrangement for ensuring timely notification in accordance with the Listing Rules. The Company believes that its current 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,

Abby Siew

Joint Company Secretary Riedel Resources Limited



02 June 2017

Mr Henko Vos & Ms Abby Siew Joint Company Secretary Riedel Resources Limited

By email: <a href="mailto:henko.vos@nexiaperth.com.au">henko.vos@nexiaperth.com.au</a> & <a href="mailto:abby.siew@nexiaperth.com.au">abby.siew@nexiaperth.com.au</a> &

Dear Mr Vos & Ms Siew

## Riedel Resources Limited (the "Company")

We refer to the following:

The Company's announcement lodged with ASX Ltd ("ASX") on 2 June 2017 regarding a change of director's interest notice for Mark Skiffington ("Appendix 3Y").

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.

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.



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 Mark Skiffington's notifiable interests occurred on 31 December 2016, it appears the Appendix 3Y should have been lodged with the ASX by 10 January 2017. As the Appendix 3Y was lodged on 2 June 2017 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 anjuli.sinniah@asx.com.au. It should <u>not</u> be sent to ASX Market Announcements.

A response is requested as soon as possible and, in any event, not later than **3:00 pm WST** on **Thursday 8 June 2017**.

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]

Dale Allen

Senior Adviser, Listings Compliance (Perth)