

ASX: IBG ANNOUNCEMENT

12 December 2018

Jessica Coupe
Company Announcements Office
Australian Securities Exchange Limited

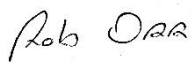
Dear Jessica

IRONBARK ZINC LIMITED– Appendix 3Z Final Directors Interest Notice Query

We refer to your letter dated 12 December 2018 regarding the late lodgement of Appendix 3Z Final Directors Interest Notice, and respond as follows:

1. The delay in lodgement of the Appendix 3Z was due to administrative oversight. The notice has been subsequently lodged as soon as the Company was made aware of the delay in lodgement.
2. The Company acknowledges its disclosure obligations under the ASX Listing Rule 3.19A and 3.19B and confirms it has procedures in place to ensure it is able to meet its disclosure obligations. The Directors are obliged to confirm any initial, change and final holding to the Company in a timely manner such that the appropriate notice can be lodged with the ASX. However the obligation to lodge rests with the Company administration.
3. Notwithstanding the administrative oversight, the Company considers its current arrangements to be adequate for the purposes of compliance with ASX Listing Rule 3.19B, however will continue to review and update its policies and procedures as appropriate.

Yours faithfully



Rob Orr
Company Secretary



12 December 2018

Mr Robert Orr
Company Secretary
Ironbark Zinc Limited
Level 1, 329 Hay Street
Subiaco WA 6008

By email: robert@ironbark.gl

Dear Mr Orr

Ironbark Zinc Limited ('IBG'): Appendix 3Z – Final Director's Interest Notice Query

ASX refers to the following:

1. IBG's Appendix 3Z lodged on MAP on 12 December 2018 for Mr David Kelly (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 the director ceased to be a director on 8 October 2018 it appears the Appendix 3Z should have been lodged with ASX by 15 October 2018. As it was lodged on 12 December 2018, it appears that IBG 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 IBG of its contract with ASX to comply with the Listing Rules. In the circumstances, IBG should make necessary arrangements to ensure it does not continue to breach the Listing Rules.

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 IBG 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 IBG 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 ListingsCompliancePerth@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 AEDT) on 17 December 2018

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.

Kind regards

Jessica Coupe
Listings Adviser, Listings Compliance (Perth)