

10 December 2014

Ms Jill Hewitt Senior Adviser, Listings Compliance (Perth) **ASX Compliance Pty Limited** Level 40 Central Park 152-158 St Georges Terrace PERTH WA 6000

Dear Jill

We refer to your letter dated 10 December 2014. In that regard, please find below the Company's responses to your questions:

- 1. The Company acknowledges that the Appendix 3Y was lodged late and that this was a result of an internal administrative oversight. The Appendix 3Y was lodged immediately upon the oversight having been identified.
- 2. Formal arrangements are in place with each director of the Company as contemplated by ASX Listing Rule 3.19B and Guidance Note 22, whereby each director agrees and undertakes to provide the Company with details of any changes to their notifiable interests, within the time frames required by ASX Listing Rule 3.19A.
- 3. The Company's existing arrangements are considered adequate and enable the Company to meet its disclosure requirements as required by listing rule 3.19B. The late lodgement of this particular Appendix 3Y notice was an isolated occurrence. However, the Company will review and reiterate its arrangements with directors and management.

Yours Sincerely

Suraj Sanghani

Company Secretary

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ASX Compliance Pty Limited ABN 26 087 780 489 Level 40 Central Park 152-158 St George's Terrace PERTH WA 6000

> GPO Box D187 PERTH WA 6840

Telephone 61 8 9224 0000 www.asx.com.au

10 December 2014

Mr S Sanghani Company Secretary Iron Mountain Mining Limited Level 7, 231 Adelaide Terrace PERTH WA 6000

Email: ssanghani@ironmountainmining.com.au

Dear Suraj

Iron Mountain Mining Limited (the "Company") - Director's Interest Notice

We refer to the following;

- 1. The Appendix 3Y lodged by the Company with ASX on 10 December 2014.
- 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 1 January 2002.
 - 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 1 January 2002 or 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 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 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 indicated that the change occurred on 20 November 2014, it appears that the Appendix should have been lodged with the ASX prior to the close of business on 27 November 2014. As the Appendix was lodged on 10 December 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 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?
- 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 tradinghaltsperth@asx.com.au it should not be sent to the Market Announcements Office.

A response is requested as soon as possible and, in any event, not later than half an hour before the start of trading (ie before 6.30 am. W.S.T) on Monday 15 December 2014.

If you have any queries or concerns, please contact me immediately.

Yours sincerely,

[Sent electronically without signature]

Jill Hewitt

Senior Adviser, Issuers Compliance (Perth)