



20th October 2015

Ben Secrett
Australian Stock Exchange Limited
Level 40 Central Park
152 – 158 St. George’s Terrace
Perth WA 6000

Dear Ben

Response to ASX Aware Letter

We refer to your letter dated 16th October 2015 and respond as follows:

1. The Company considers the Assay Results disclosed in the Announcement to be information that a reasonable person would expect to have a material effect on the price or value of its securities.

2. Not applicable, see 1 above.

3. Table 1 below sets out the dates and times that the Company first became aware of the Assay Results.

4. The Company is of the opinion that to release Assay Results in an ad-hoc manner without comment is not meaningful to the market. Rather a measured approach is preferable in order that the reader is presented with a balanced and accurate report.

The sheer volume of results received over the period required tabulation, assessment of the quality control samples that were submitted, update of maps and tables as well as detailed interpretation. Once completed, senior management, competent person and board reviews must be conducted in order to ensure compliance.

The procedure detailed above and receipt of the final Assay Results not being received until Friday 9th October 2015, resulted in the information not being released to the market prior to the 14th October 2015. The initial draft ASX announcement was circulated internally on the evening of Monday 12th October for review. The following day, the directors confirmed the announcement and attaching tables, after amendment, were compliant with ASX Listing Rules and the JORC Code. The announcement was subsequently released in the evening of Tuesday 13th October 2015.

5. The Company confirms that it is in compliance with the Listing Rules and, in particular, Listing Rule 3.1

ASX CODE: TYX

DIRECTORS

Ian Finch
Executive Chairman

Neil McKay
*Company Secretary and
Non-Executive Director*

Bruno Seneque
Non-Executive Director

SHARE REGISTRY

Advanced Share Registry Services

110 Stirling Highway
Nedlands WA 6009
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REGISTERED OFFICE

Level 2 679 Murray Street
West Perth WA 6005
P: +61 8 9485 1040
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Date	WST Time	Batch Number	Hole Number	Quantity
6 October 2015	1:47pm	JUMB 004	15GBRC052 to 056 (1 st part)	250
8 October 2015	11:42 am	JUMB 004	15GBRC056 (2 nd part) to0 69	771
9 October 2015	3:55 pm	JUMB 005	15GBRC070 to 074 and 15GBRC020	398
		TOTAL ASSAYS RECEIVED		1,419

Table 1

Yours sincerely



Neil W. McKay
Company Secretary



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ASX TYX | ABN 79 124 990 405



16 October 2015

Neil McKay
Director and Company Secretary
Tyranna Resources Limited
Level 2, 679 Murray Street
WEST PERTH WA 6005

By email

Dear Mr McKay

TYRANNA RESOURCES LIMITED (“ENTITY”): ASX AWARE LETTER

ASX Limited (“ASX”) refers to the following.

1. The Entity’s announcement entitled “Jumbuck Continues to Deliver Gold Results” lodged on the ASX Market Announcements Platform at 7.34pm AWST on Tuesday, 13 October 2015 and released to the market at 6.27am AWST on Wednesday, 14 October 2015 (the “Announcement”), disclosing details of the fourth batch of gold assay results from the Entity’s recent reverse circulation drilling program at its Golf Bore prospect (“Assay Results”).
2. The increase in the price of the Entity’s securities on Tuesday, 13 October 2015 from an opening price of \$0.027 to a closing price of \$0.032.
3. Listing Rule 3.1, which requires a listed entity to give ASX immediately any information concerning it that a reasonable person would expect to have a material effect on the price or value of the entity’s securities.
4. The definition of “aware” in Chapter 19 of the Listing Rules. This definition states that:

“an entity becomes aware of information if, and as soon as, an officer of the entity (or, in the case of a trust, an officer of the responsible entity) has, or ought reasonably to have, come into possession of the information in the course of the performance of their duties as an officer of that entity.”

Additionally, you should refer to section 4.4 in Guidance Note 8 *Continuous Disclosure: Listing Rules 3.1 – 3.1B “When does an entity become aware of information”*.



5. Listing Rule 3.1A, which sets out exceptions from the requirement to make immediate disclosure, provided that each of the following are satisfied.

“3.1A Listing rule 3.1 does not apply to particular information while each of the following requirements is satisfied in relation to the information:

3.1A.1 One or more of the following applies:

- It would be a breach of a law to disclose the information;*
- The information concerns an incomplete proposal or negotiation;*
- The information comprises matters of supposition or is insufficiently definite to warrant disclosure;*
- The information is generated for the internal management purposes of the entity; or*
- The information is a trade secret; and*

3.1A.2 The information is confidential and ASX has not formed the view that the information has ceased to be confidential; and

3.1A.3 A reasonable person would not expect the information to be disclosed.”

6. ASX’s policy position on the concept of “confidentiality” which is detailed in section 5.8 of Guidance Note 8 *Continuous Disclosure: Listing Rules 3.1 – 3.1B* “Listing Rule 3.1A.2 – the requirement for information to be confidential”. In particular, the Guidance Note states that:

“Whether information has the quality of being confidential is a question of fact, not one of the intention or desire of the listed entity. Accordingly, even though an entity may consider information to be confidential and its disclosure to be a breach of confidence, if it is in fact disclosed by those who know it, then it ceases to be confidential information for the purposes of this rule.”

Having regard to the above, we ask that you answer the following questions in a format suitable for release to the market in accordance with Listing Rule 18.7A:

1. Does the Entity consider the Assay Results disclosed in the Announcement to be information that a reasonable person would expect to have a material effect on the price or value of its securities?
2. If the answer to question 1 is “no”, please advise the basis for that view.
3. If the answer to question 1 is “yes”, when did the Entity first become aware of the Assay Results disclosed in the Announcement? In answering this question, please specify the time and date when the Entity first became aware of the Assay Results or any part thereof.
4. If the answer to question 1 is “yes” and the Entity first became aware of the Assay Results disclosed in the Announcement before the close of trade on Tuesday, 13 October 2015, please explain why the



Assay Results were not released to the market at an earlier time, commenting specifically on when you believe the Entity was obliged to release the information under Listing Rules 3.1 and 3.1A and what steps the Entity took to ensure that the information was released promptly and without delay.

5. Please confirm that the Entity is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.

When and where to send your response

This request is made under, and in accordance with, Listing Rule 18.7. Your response is required as soon as reasonably possible and, in any event, **by not later than 1.00pm AWST on Tuesday, 20 October 2015**. If we do not have your response by then, ASX will have no choice but to consider suspending trading in the Entity's securities under Listing Rule 17.3.

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, the Entity'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.

ASX reserves the right to release a copy of this letter and your response on the ASX Market Announcements Platform under Listing Rule 18.7A. Accordingly, your response should be in a form suitable for release to the market.

Your response should be sent to me by e-mail at tradinghaltspert@asx.com.au and ben.secrett@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.

Listing Rule 3.1

Listing Rule 3.1 requires a listed entity to give ASX immediately any information concerning it that a reasonable person would expect to have a material effect on the price or value of the entity's securities. Exceptions to this requirement are set out in Listing Rule 3.1A.

The obligation of the Entity to disclose information under Listing Rules 3.1 and 3.1A is not confined to, nor is it necessarily satisfied by, answering the questions set out in this letter.

In responding to this letter, you should have regard to the Entity's obligations under Listing Rules 3.1 and 3.1A and also to Guidance Note 8 *Continuous Disclosure: Listing Rules 3.1 – 3.1B*.

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 the Entity'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 may 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*.

Please contact me if you have any queries or concerns about the above.

Yours sincerely

[sent electronically without signature]

Ben Secrett
Senior Adviser, ASX Listings Compliance