

14 December 2015

ASX Compliance Pty Limited
Level 40, Central Park
152-158 St George's Terrace
Perth WA 6000

Dear Mr Allen,

Initial Director's Interest Notice

Avenira Limited ("Avenira") acknowledges your letter of 9 December 2015. Accordingly I would like to provide the following responses:

1. The Appendix 3X for Mr Farouk Chaouni was not lodged within the timeframe as set out in ASX listing rule 3.19A as a direct result of me not adhering to the Company's communication checklist. I accept responsibility for this breach and I have improved our internal processes to ensure compliance obligations are satisfied in accordance with the ASX listing rules.
2. The Company has a checklist and notification process in place to ensure director holdings are promptly notified and disclosure obligations are met under the ASX listing rules.
3. A more stringent notification system including amendments to the current checklist has been introduced in order for the Company to comply with the ASX listing rules.

Should you wish to discuss this matter further, please have no hesitation to contact me on (08) 9264 7000.

Yours sincerely



Rod Wheatley
Chief Financial Officer



9 December 2015

Mr Rod Wheatley
Company Secretary
Avenira Limited

By email: rodw@minemakers.com.au

Dear Mr Wheatley

Avenira Limited (the "Company")

We refer to the following:

The Company's announcement lodged with ASX Ltd ("ASX") on 7 December 2015 regarding an initial director's interest notice for Farouk Chaouni ("Appendix 3X").

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.*

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 3X indicates that Farouk Chaouni was appointed as a director on 19 November 2015, the Appendix 3X should have been lodged with the ASX by 26 November 2015. As the Appendix 3X was lodged on 7 December 2015 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 3X 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 dale.allen@asx.com.au. It should not 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 Monday 14 December 2015**.

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)