



15 January 2016

Ms Elizabeth Harris  
Australian Securities Exchange  
Level 40, Central Park  
152-158 St George's Terrace  
PERTH WA 6000

Dear Ms Harris,

**RESPONSE TO ASX APPENDIX 3X AND 3Z QUERY**

I refer to your letter of 14 January 2016 regarding lodgement of a final director's interest notice for Nicholas Ong and Andrew Tunks ("Appendices 3Z") and regarding an initial director's interest for Dion Sullivan and Adam Wellisch ("Appendices 3X") on 12 January 2016. In response to your queries regarding the late lodgement of the Appendices 3Z and Appendices 3X the Company provides the following:

1. The Appendices 3Z and Appendices 3X were lodged late due to an administrative oversight. The Appendices 3Z and Appendices 3X relate to the Company's recent re-compliance with Chapters 1 and 2 of the ASX Listing Rules approved by shareholders on 7 October 2015 and were lodged prior to the Company's reinstatement to trading on ASX on 13 January 2016.
2. Formal arrangements are in place with each director of the Company whereby the Company Secretary is to be notified of any changes in a director's interest, to ensure that the requirements of ASX Listing Rule 3.19 are met.
3. Notwithstanding the administrative oversight, the Company considers the current arrangements to be adequate to ensure compliance with ASX Listing Rule 3.19B.

Yours sincerely,

Mark Clements  
Company Secretary



14 January 2016

Mr Mark Clements  
MSM Corporation International Limited  
Office J, 1139 Hay Street  
West Perth WA 6005

**By Email**

Dear Mr Clements,

**MSM Corporation International Limited (the "Company")**

I refer to the following:

1. The Company's announcements lodged with ASX Ltd ("ASX") on 12 January 2016 regarding a final director's interest notice for Nicholas Ong and Andrew Tunks ("Appendices 3Z") and regarding an initial director's interest notice for Dion Sullivan and Adam Wellisch ("Appendices 3X").

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 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) 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 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.*

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.*

As the Appendices 3Z indicate Nicholas Ong and Andrew Tunks ceased to be directors of the Company on 29 December 2015, and the Appendices 3X indicate that Dion Sullivan and Adam Wellisch were appointed on 29 December 2015, the Appendices 3Z and Appendices 3X should have been lodged with the ASX by 6 January 2016. As the Appendices 3Z and Appendices 3X were lodged on 12 January 2016 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 Appendices 3Z and Appendices 3Y were 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 Elizabeth.Harris@asx.com.au. It should not be sent to the Company Announcements Office.

A response is requested as soon as possible and, in any event, not later than **3:00 pm WST on Friday 15 January 2016**.

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]*

Elizabeth Harris

**Principal Adviser, Listings Compliance (Perth)**