

13 December 2012

ASX Compliance Pty Ltd  
Level 8, Exchange Plaza  
2 the Esplanade  
PERTH WA 6000

Dear Mr Baggott

**Appendices 3Y change of directors' interest notices**

I refer to your letter dated 13 December 2012 regarding the late lodgement of Appendices 3Y for Mr Zeke Pervan and Mr David Zohar.

The Company responds to your three questions as follows:

1. Please explain why the Appendices 3Y were lodged late?

Answer: the change in Directors' interests came about from the completion of the takeover bid from Iron Mountain Mining Limited. After that, the Directors' notified the Company of the change in interests. The Appendices 3Y were prepared but they were not lodged due to an oversight. Upon discovery of the oversight, the Company immediately lodged the Appendices 3Y on the ASX.

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?

Answer: The Directors are aware of the requirement that the Company must disclose to the ASX any change in their interests in securities in the Company within 5 business days of such change.

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?

The current arrangements are being enforced and the Company believes that they are adequate. All Directors are aware of their obligations under the Listing Rules. This late lodgement was an oversight due to human error and should not occur again.

Yours sincerely,



**Shoshanna Zohar**  
Company Secretary  
United Orogen Limited



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13 December 2012

Shoshanna Zohar  
Company Secretary  
United Orogen Limited  
Level 7, 231 Adelaide Terrace  
PERTH WA 6000

By email

Dear Shoshanna

**United Orogen Limited (the "Company")  
Appendices 3Y –Director's Interest Notice**

We refer to the following;

1. The Appendices 3Y lodged by the Company with ASX Limited ("ASX") on 13 December 2012 for Mr David Zohar and Dr Zhukov Pervan.
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). 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.

The Appendices 3Y indicate that a change of director's interests for Mr Zohar and Dr Pervan occurred on 3 October 2012. As the Appendices 3Y were lodged on 13 December 2012 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 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 email at [wade.baggott@asx.com.au](mailto:wade.baggott@asx.com.au) or by facsimile on facsimile number (08) 9221 2020. 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 **5:00pm WST on Monday 17 December 2012**.

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 should separately address each of the questions asked. If you have any queries or concerns, please contact me immediately.

Yours sincerely,

[sent electronically without signature]

**Wade Baggott**  
**Senior Adviser, Listings (Perth)**