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16 April 2014

Shannon Hong  
Adviser, Listings Compliance  
Australian Securities Exchange Limited ("ASX")  
20 Bridge Street  
SYDNEY NSW 2000

Dear Shannon

I am in receipt of your letter dated 16 April 2014 to Mr Marshall Maine and advise as follows:

1. The Appendix 3Z for Mr Craig Munro was lodged late due to an administrative oversight.
2. The Company has agreements in place with all Directors as recommended by ASX Guidance Note 22 advising them of their obligations under the ASX Listing Rules.
3. We believe that our existing arrangements for recording Director share transactions are adequate and that this notification lapse was due to an isolated error.

Please do not hesitate to contact me if I can provide further information.

Yours sincerely  
**BATHURST RESOURCES LTD**

A handwritten signature in black ink, appearing to read 'G. Anderson', written over a light grey circular background element.

**GRAHAM ANDERSON**  
Joint Company Secretary



ASX Compliance  
ABN 26 087 780 489  
20 Bridge Street  
Sydney NSW 2000  
PO Box H224  
Australia Square  
NSW 1215

Telephone 61 2 9227 0132  
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16 April 2014

Mr Marshall Maine  
Company Secretary  
Bathurst Resources Limited  
14 Emerald Terrace  
West Perth WA 6005

By Email: [mmaine@bathurstresources.co.nz](mailto:mmaine@bathurstresources.co.nz)

Dear Marshall

**Bathurst Resources Limited (the "Company") Appendix 3Z – Final Director's Interest Notice.**

We refer to the following;

1. The Appendix 3Z lodged by the Company with ASX Limited ("ASX") on 16 April 2014 for Mr Craig Rennie Munro.
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.

As the Appendix 3Z indicated that the director ceased to be a director on 31 March 2014, it appears the Appendix 3Z should have been lodged with ASX by 7 April 2014. As it was lodged today, it appears that the Company may be in breach of listing rule 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 3Z 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 [shannon.hong@asx.com.au](mailto:shannon.hong@asx.com.au). It should not be sent to the Company Announcements Office.

A response is requested as soon as possible (i.e. before 9.30 am. A.E.S.T.) on **Tuesday 22 April 2014**.

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]*

Shannon Hong

**Adviser, Listings Compliance**