



16 September 2015

Ms Anjuli Sinniah
Adviser, Listings Compliance (Perth)
ASX Compliance Pty Limited
Level 40, Central Park
152-158 St Georges Terrace
Perth WA 6000

Dear Ms Sinniah

Atrum Coal NL (Company) – Response to Appendix 3Y Questions

Thank you for your letter, dated 14 September 2015.

The Company addresses the questions in your letter as follows:

1. The Company confirms that the late lodgement of the Appendix 3Y in respect of Mr James Chisholm was an administrative error.
2. The Company has letters of appointment in place with its Directors, that include, amongst other things, obligations on each Director to provide information to the Company with respect to a notifiable interest of a Director (as defined by the ASX Listing Rules) so that the Company can comply with, amongst other things, ASX Listing Rule 3.19A.
3. The Company has recently updated its internal procedures to ensure that it complies with ASX Listing Rule 3.19A and Rule 3.19B in the future.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Theo Renard', is written over a light blue horizontal line.

Theo Renard
Company Secretary



14 September 2015

Theo Noel Renard
Company Secretary
Atrum Coal NL
Level; 1, 329 Hay Street
SUBIACO WA 6008

By email: trenard@atrumcoal.com

Dear Mr Renard

Atrum Coal Limited (the "Company")

We refer to the following:

The Company's announcement lodged with ASX Ltd ("ASX") on 11 September 2015 regarding a change of director's interest notice for James Alexander Chisholm ("Appendix 3Y").

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 3Y indicates that a change in James Alexander Chisholm's notifiable interest occurred on 25 August 2015 the Appendix 3Y should have been lodged with the ASX by 1 September 2015. As the Appendix 3Y was lodged on 11 September 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 3Y 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 anjuli.sinniah@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 Wednesday 16 September 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]

Anjuli Sinniah
Adviser, Listings Compliance (Perth)