

17 March 2016

Ms Anjuli Sinniah
Advisor, Listings Compliance (Perth)
ASX Compliance


RE: Your letter of 15 March 2016 regarding Appendix 3Z for Mr Charbel Nader

Dear Ms Sinniah,

With respect to your questions:

1. The Appendix 3Z was lodged late due to an oversight by myself, the Company Secretary. By way of explanation, the week of 22-29 February 2016 we were entirely focused on obtaining completion of the mid-year financial reports and lodging for ASX disclosure. After the mid-year release, the Appendix 3Z was forgotten until a review of pending tasks revealed my error and we subsequently released the Appendix 3Z.
2. Aspermont's Corporate Governance Plan includes a policy on continuous disclosure to ensure that all changes to the notifiable interests of Directors are communicated to the Company Secretary and then to the ASX within the timeframes set out in Listing Rules 3.19A and 3.19B. In this instance, Mr Nader had correctly notified the Company of all transactions and it was due to my oversight that it was not released to the market by the due date.
3. Aside from this isolated oversight due to a personal mistake of the Company Secretary, the Company considers its current policy to be adequate to ensure future compliance with Listing Rules 3.19A and 3.19B

Sincerely,



John R. Detwiler
Company Secretary



15 March 2016

Mr John Detwiler
Company Secretary
Aspermont Limited
613-619 Wellington Street
PERTH WA 6000

By email: john.detwiler@aspermont.com

Dear Mr Detwiler,

Aspermont Limited (the “Company”)

We refer to the following:

The Company’s announcement lodged with ASX Ltd (“ASX”) on 11 March 2016 regarding a final director’s interest notice for Mr Charbel Nader (“Appendix 3Z”).

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). 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.

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 3Z indicate Mr Nader ceased to be a director of the Company on 21 February 2016, the Appendix 3Z should have been lodged with the ASX by 29 February 2016. As the Appendix 3Z was lodged on 11 March 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 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 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 Thursday 17 March 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]

Anjuli Sinniah
Adviser, Listings Compliance (Perth)