



## Redbank Copper Limited

29 April 2019

Listings Advisor  
Australian Stock Exchange  
Level 40 Central Park  
152 -158 St Georges Terrace  
Perth WA 6000

Dear Jessica

In response to your query in relation to the late lodgement of an Appendix 3Z please note the following:

1. The Appendix 3Z was lodged late due to a mix up as to who was going to prepare the document.
2. The current directors are in-house and therefore the communication between them occurs frequently.
3. The company secretary will follow up with the relevant director to ensure the document is submitted on time.

If you have any questions please don't hesitate to call myself at the office on 08 6241 1888.

Thank you for your support.

Best Regards

**Carol New**

**Company Secretary**

**Redbank Copper Ltd ~ Level 1/24 Mumford Place Balcatta WA 6021**

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26 April 2019

Reference: ODIN00955

Ms Carol New  
Company Secretary  
Redbank Copper Limited  
24 Mumford Place  
Balcatta WA 6021

By email: carol.new@deltaman.com.au

Dear Ms New

**Redbank Copper Limited ('RCP'): Appendix 3Z – Final Director's Interest Notice Query**

ASX refers to the following:

1. RCP's Appendix 3Z lodged on ASX Market Announcements Platform ('MAP') on 26 April 2019 for Mr Neil Porter (the 'Notice');
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) 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.'*

3. Listing rule 3.19B which states that:

*'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 Appendix 3Z indicated that the director ceased to be a director on 9 April 2019 it appears the Appendix 3Z should have been lodged with ASX by 16 April 2019. As it was lodged on 26 April 2019, it appears that RCP may have breached Listing Rules 3.19A and/or 3.19B.

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Please note that ASX is required to record details of breaches of the Listing Rules by listed entities for its reporting requirements.

ASX reminds RCP of its contract with ASX to comply with the Listing Rules. In the circumstances, RCP should make necessary arrangements to ensure it does not continue to breach the Listing Rules.

### **Request for Information**

Under Listing Rule 18.7, we ask that you answer each of the following questions 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*.

1. Please explain why the Appendix 3Z was lodged late.
2. What arrangements does RCP have in place under Listing Rule 3.19B 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 RCP intend to take to ensure compliance with Listing Rule 3.19B?

### **When and where to send your response**

Your response should be sent to me by e-mail at [ListingsCompliancePerth@asx.com.au](mailto:ListingsCompliancePerth@asx.com.au). It should not be sent to the ASX Market Announcements Office.

A response is requested as soon as possible and, in any event, no later than half an hour before the start of trading (i.e. before 9:30 am AEST) on 1 May 2019.

Under Listing Rule 18.7A, a copy of this letter 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.

### **Enquiries**

If you have any queries or concerns about any of the above, please contact me immediately.

Yours sincerely

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**Jessica Coupe**  
Adviser, Listings Compliance (Perth)