

26 June 2012

Anthony Ingegneri
Australian Securities Exchange
Company Announcements Office
Level 4, Exchange Centre
20 Bridge Street
Sydney NSW 2000

Dear Sir

Re: Axiom Mining Limited (the “Company”)

I refer to your letter dated 22 June 2012 regarding the Appendix 3Y lodged by the Company for Director, Stephen Ray Williams.

I note the relevant responsibilities of the Company under LR 3.19A.2 and LR 3.19B.

The failure of the Company to notify the ASX in respect of the notifiable interest on 20 June 2011 was an oversight in the shares that were transferred by Robyn Marie Williams, the Director's wife, to her Superannuation Fund. The beneficial interest did not change and was previously notified by the Director under LR 3.19B on the 15 June 2011 as indirect interests. Nevertheless, the transfer should have been notified by the Company.

The failure of the Company to notify the ASX in respect of the notifiable interest on 8 June 2012 was due to a delayed notification from the Registry of the confirmation of the transfer of shares from the Director to his wife Robyn Marie Williams and from her, on to her Superannuation Fund. The notification to the ASX was therefore delayed until after the information has been confirmed by both the Registry and Directors of the Company until after 18 June 2012. Again, the Company notes that it should have notified within the prescribed period but notes that the beneficial interest to an indirect related holder should have been disclosed in accordance with LR 3.19A.2, being 5 business days of the transfers.

The Company requests that the ASX accept the oversights. The Company has a policy which requires Directors to notify the Chairman of any proposed transfer of shares and seek approval or in the case of the Chairman, the Managing Director, and for the Company to comply with the relevant Listing Rules.

The Company will ensure that additional care is taken in the future to comply with its obligations. Such measure includes automatic email from the Registry to inform the Company within one day of any movements in Director's interest (direct or indirect). The Company requests the ASX leniency in the circumstances in respect of the oversights.

Yours faithfully



Valerie Valdez
Company Secretary
Axiom Mining Limited



ASX Compliance Pty Limited
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20 Bridge Street
Sydney NSW 2000
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Australia Square
NSW 1215

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22 June 2012

Valerie Valdez
Company Secretary
Axiom Mining Limited
Suite 3 Level 11
1 Chifley Square
Sydney NSW 2000

By Email:

Dear Valerie,

Axiom Mining Limited (the "Company")

We refer to the following;

1. The Appendix 3Y lodged by the Company with ASX Limited ("ASX") on 20 June 2012 for Stephen Ray Williams (the "Notice").
2. Listing rule 3.19A.2 which requires an entity to tell ASX the following:

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. 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 Notice indicates that a change in Stephen Ray Williams' notifiable interest occurred on 20 June 2011 and 8 June 2012. It appears that a Notice should have been lodged with ASX by 27 June 2011 and 18 June 2012 respectively. Consequently, the Company may be in breach of listing rules 3.19A and/or 3.19B. It also appears the director concerned may have breached section 205G of the Corporations Act.

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 Notice 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 at anthony.ingegneri@asx.com.au or by facsimile on facsimile number **(02) 9241 7620**. It should not be sent to the ASX Market Announcements Office.

A response is requested as soon as possible and, in any event, not later than half an hour before the start of trading (**i.e. before 9.30 a.m. A.E.S.T.**) on Wednesday, 27 June 2012.

Under listing rule 18.7A, a copy of this query and your response may 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]

Anthony Ingegneri
Adviser, Listings (Sydney)