

13 April 2017

ASX Compliance Pty Ltd
Perth

Attention: Ms Anjuli Sinniah

Dears Sirs

APPENDIX 3Y - LATE LODGEMENT

1. We refer to your letter dated 12 April 2017, and hereby respond to your queries as follows:

1.1. Please explain why the Appendix 3Y was lodged late.

The Appendix 3Y lodged on 10 April 2017 was approved by the relevant director and forwarded to the Company's group legal counsel before 6 April 2017, the due date for the announcement. Due to an inadvertent administrative oversight on his part, it was not lodged until 10 April 2017.

1.2. 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?

Directors are aware of their disclosure obligations, including those under listing rule 3.19A. The chairman of the board and the company secretary (through the group legal counsel) periodically remind directors of these obligations.

1.3. 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?

Not applicable as directors believe that this late lodgement is an isolated incident which **does not** indicate that current arrangements are inadequate or are not being enforced.

2. Please let us know if you require further clarification or explanation.

Yours faithfully
For and on behalf of
ASAPLUS RESOURCES LIMITED



LAU Eng Foo (Andy)
Managing Director

cc Company secretary

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12 April 2017

Swapna Keskar
Company Secretary
Asapalus Resources Limited

By email: keskar@companymatters.com.au

Dear Swapna

Asapalus Resources Limited (the "Company")

We refer to the following:

The Company's announcement lodged with ASX Ltd ("ASX") on 10 April 2017 regarding a change of director's interest notice for Andy Lau Eng Foo ("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

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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 Andy Lau's notifiable interest occurred on 30 March 2017 the Appendix 3Y should have been lodged with the ASX by 6 April 2017. As the Appendix 3Y was lodged on 10 April 2017 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 and tradinghaltspert@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 13 April 2017**.

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)