

28 September 2018

**Charlotte Hope
Senior Advisor, Listings Compliance
ASX Limited
29 Bridge St.
Sydney NSW 2000**

Dear Ms Hope,

Re: Timah Resources Limited – Lodgement of Appendix 3X's

We refer to correspondence from the ASX dated 26 September 2018 concerning the recent lodgement by Timah Resources Limited (the company) of various Appendix 3X documents. This followed recent additions to the company's board of directors. We acknowledge that these documents were lodged after the due date and accordingly the company breached listing rule 3.19A.

In this regard we apologise for the late lodgement of these documents.

Your correspondence requests an answer to a number of questions and we advise below using the numerical order used in your correspondence.

1. The Appendices were lodged late due to oversight. This was due primarily to a lack of communication between officers of the company.
2. At the next board meeting we intend to remind all directors of the company of the necessity to inform officers of all the information they are required to disclose so that Appendices 3X, 3Y and 3Z can be lodged on a timely basis. We also aim to improve communication between all areas of corporate administration within the company. We intend to circulate to all directors and officers a copy of all ASX listing rules and engage in appropriate training.
3. We believe these arrangements will be adequate in ensuring these oversights do not reoccur and the company will be compliant with listing rule 3.19B in the future.

We again apologize for this initial oversight.

Should you require any further information please do not hesitate to contact the undersigned.

Kind regards,



**Andrew Wallis
Company Secretary**

contact

Address

Level 25, St Martins Tower
31 Market Street
Sydney NSW 2000

Contact Details

Phone: +612 9267 4633
Fax: +612 9267 4388

www.timahresources.com.au

Email: info@timahresources.com.au



26 September 2018

Mr Andrew Wallis

Company Secretary
Timah Resources Limited
Suite 2501 Level 25
St Martins Tower
31 Market Street
SYDNEY, NSW, 2000

By email: andwallis@bigpond.com

Dear Mr Wallis

Timah Resources Limited (the “Entity”): Appendix 3Xs – Initial Directors’ Interest Notices

We refer to the following:

1. The Appendix 3Xs lodged by the Entity with ASX on 24 September 2018 for Mr Derrick De Souza, Dr Jordina Siu Yi Mah and Ms Li-Na Mah (the “Directors’ Notices”);
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 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 3.19A. The entity must enforce the arrangements with the director.

20 Bridge Street
Sydney NSW 2000

PO Box H224
Australia Square NSW 1215

Customer service 13 12 79
asx.com.au

As the Appendix 3Xs indicate that one of the directors was appointed on 30 April 2018 and two on 8 June 2018 it appears that the Appendix 3Xs should have been lodged with ASX by 7 May 2018 and 15 June 2018 respectively. As the Appendix 3Xs were lodged on 26 September 2018, it appears that the Entity 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 entities for its reporting requirements.

ASX reminds the Entity of its contract with ASX to comply with the listing rules. In the circumstances ASX considers that it is appropriate that the Entity 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*, under listing rule 18.7 we ask that you answer each of the following questions.

1. Please explain why the Appendices were lodged late.
2. What arrangements does the Entity 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 the Entity intend to take to ensure compliance with listing rule 3.19B?

Your response should be sent to me by e-mail at charlotte.hope@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, not later than half an hour before the start of trading (ie before 9.30 a.m. A.E.S.T.) on Monday, 1 October 2018.

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.

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

Kind regards

[Sent electronically without signature]

Charlotte Hope

Senior Adviser, Listings Compliance (Sydney)

T 02 9227 0135

E charlotte.hope@asx.com.au