

13 April, 2012

Kate Kidson Principal Adviser, Listings (Melbourne) ASX Compliance Pty Ltd GPO Box 1784 Melbourne VIC 3001

Dear Kate,

Appendix 3Y - Change of Director's Interest Notice

We refer to your letter dated 12 April, 2012 and respond to the questions raised as follows:

- 1. We regret that the Appendix 3Y was lodged late, this was due to an administrative oversight.
- 2. The matter related to a grant of options to the Managing Director under his employment contract. Details of the grant were provided in the Appendix 3B lodged with the ASX at the time of grant. It was not related to a failure by the Director to disclose.
- We believe the disclosure requirements by directors under our Securities Trading Policy are adequate to ensure compliance with listing rule 3.19B.

Yours sincerely

Company Secretary



12 April 2012

Mr David Forsyth Company Secretary Tigers Realm Coal Limited MELBOURNE VIC 3000

By Email

Dear David

ASX Compliance Pty Ltd ABN 26 087 780 489 Level 4 Rialto North Tower 525 Collins Street Melbourne VIC 3000

GPO Box 1784 Melbourne VIC 3001

Telephone 61 3 9617 8658 Facsimile 61 3 9614 0303 www.asx.com.au

Tigers Realm Coal Limited (the "Company")

We refer to the following;

- The Appendix 3Y lodged by the Company with ASX on 30 March 2012 for Mr Martin Alexander Grant;
- 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.
- 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 Appendix 3Y indicates that a change in Mr Grant's notifiable interest occurred on 1 February 2012. It appears that the Notice should have been lodged with ASX by 8 February 2012. Consequently, the Company may be in breach of listing rules 3.19A and/or 3.19B. It also appears the directors 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 Appendix 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 **kate.kidson@asx.com.au** or by facsimile on facsimile number (03) 9614 0303. It should <u>not</u> be sent to the Company 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.S.T.) on Wednesday, 18 April 2011.

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 should separately address each of the questions asked. If you have any gueries or concerns, please contact me immediately.

Yours sincerely

[Sent electronically without signature]

Kate Kidson

Principal Adviser, Listings (Melbourne)