



**Siburan  
Resources  
Limited**

5 July 2011

ASX Compliance Pty Limited  
Level 8, Exchange Plaza  
2 The Esplanade  
Perth WA 6000  
Attn: Ms Fiona Murphy

by email: [fiona.murphy@asx.com.au](mailto:fiona.murphy@asx.com.au)

Dear Ms Murphy

**APPENDIX 3Y - CHANGE OF DIRECTOR'S INTEREST NOTICE**

We acknowledge receipt of your letter dated 1 July 2011 in relation to the Appendix 3Y lodged on 30 June 2011.

We acknowledge that lodgement of the notification of the changes of interest occurred outside the prescribed five business day notification period.

In response to your questions, we advise as follows:

1. The change in interest arose as a result of advice received from Mr Butler's accountant and actioned by the joint director of the trustee of the family trust, Mr Butler's wife, to sell all security holdings in the family trust prior to the end of financial year. Unfortunately, Mr Butler was travelling during the time in which the trades took place in the remote area of the Gascoyne where no mobile coverage was available.

We note that the trades were identified by the Company during a routine year-end confirmation of all directors' holdings as at 30 June 2011. As a result, notification of the trades was late but was made as soon as practically possible once they were brought to the Company's attention.

2. In order to fulfil its obligations under Listing Rule 3.19B, the Company has entered into a deed with Mr Butler on 13 May 2010 requiring that he advise the Company of any change of interest within three business days of the change (**ASX Disclosure Deed**). In addition, the Company has a **Securities Trading Policy** adopted by the Board on 20 December 2010 (**Securities Trading Policy**) in effect. The **Securities Trading Policy** contains specific procedures pursuant to which employees and directors are required to notify the Company prior to dealing in the Company's securities.

We further note that a standing agenda item at Board meetings is confirmation of directors' current shareholdings and relevant interests, at which time each director confirms there has been no change in their notifiable interests.

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3. The Company believes its existing notification procedures are adequate and has reinforced the relevant requirements to Mr Butler, emphasising the importance of complying with the Securities Trading Policy and advising of changes in relevant interests in accordance with the ASX Disclosure Deed. We note that the standing agenda item mentioned above continues to be discussed at every Board meeting.

Regrettably, on this occasion, due to the trades occurring during the absence of Mr Butler in a remote area of Western Australia, the change of interest was overlooked.

Mr Butler has given the Board his assurance that all future trades in the Company's securities will be conducted in accordance with all required procedures to ensure full compliance with Listing Rule 3.19B.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Karen Logan'.

Karen Logan  
*Company Secretary*



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1 July 2011

Ms Karen Logan  
Siburan Resources Limited  
Suite 9, 18 Stirling Highway  
Nedlands  
WA 6009

Dear Karen

**Siburan Resources Limited (the "Company") Appendix 3Y – Change of Director's Interest Notice**

We refer to the following:

1. Appendix 3Y lodged by the Company with ASX Ltd ("ASX") on 30 June 2011 regarding a change in the director's interest for Brent Butler (the "Appendix 3Y").
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 an 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). The entity must complete an 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 an 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 3.19.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 the change in each of the directors' notifiable interest occurred on 18 May 2011. It appears that the Appendix 3Y should have been lodged with ASX by 25 May 2011. Consequently, 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 [fiona.murphy@asx.com.au](mailto:fiona.murphy@asx.com.au) or by facsimile on facsimile number (08) 9221 2020. It should not be sent to the Company Announcements Office.

A response is requested as soon as possible and, in any event, not later than **5:00 pm WST on Tuesday 5 July 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 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]*

Fiona Murphy  
**Adviser, Listings (Perth)**