

T +64 4 499 6830
F +64 4 974 5218
E wellington@bathurstresources.co.nz

Level 12, 1 Willeston Street
Wellington 6011, New Zealand
PO Box 5963, Lambton Quay
Wellington 6145, New Zealand



22 October 2013

Mr Dale Allen
Adviser, Listings Compliance (Perth)
Australian Securities Exchange Limited ("ASX")
By email: dale.allen@asx.com.au

Dear Dale

I refer to your letter dated 17 October 2013 regarding Appendices 3Y – Change of Director's Interest Notices for Mr David Frow, I also acknowledge the filing of Appendices 3Y – Change of Director's Interest Notice for Mr Toko Kapea, filed on 18 October 2013. Both of these filings were lodged late and in breach of ASX Listing Rule 3.19A. In response to your letter we advise as follows:-

1. Both directors are New Zealand based and were not sufficiently familiar with the ASX Listing Rule requirements to notify the company of their share trading within 5 business days.
2. The Company has processes in place with all Directors as recommended by ASX Guidance Note 22 notifying them of their obligations under the ASX Listing Rules.
3. While the company believes that its current arrangements are adequate, it is currently conducting a full review of its corporate governance systems and processes. As part of this review, the directors will be counselled on their obligations under both ASX and NZSX Listing Rules.

Please do not hesitate to contact me if I can provide further information.

Yours sincerely
BATHURST RESOURCES LTD

A handwritten signature in black ink, appearing to read 'M. Maine'.

MARSHALL MAINE
Company Secretary

For personal use only



ASX Compliance Pty Limited
ABN 26 087 780 489
Level 8 Exchange Plaza
2 The Esplanade
PERTH WA 6000

GPO Box D187
PERTH WA 6840

Telephone 61 8 9224 0000
Facsimile 61 8 9221 2020
www.asx.com.au

17 October 2013

Mr Marshall Maine
Company Secretary
Bathurst Resources (New Zealand) Limited
14 Emerald Terrace
WEST PERTH WA 6005

By Email: mmaine@bathurstresources.co.nz

Dear Marshall

Bathurst Resources (New Zealand) Limited (the "Company") Appendix 3Y - Change of Director's Interest Notice.

We refer to the following;

1. The Appendix 3Y lodged by the Company with ASX Limited ("ASX") on 17 October 2013 for Mr David John Frow.
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). 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 3.19.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.

As the Appendix 3Y indicated that changes in the directors' relevant interests occurred on 23 September 2013, it appears that the Appendix 3Y should have been lodged with the ASX by 30 September 2013. As the Appendix 3Y was lodged on 17 October 2013, 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 dale.allen@asx.com.au or 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 (i.e. before 4.00pm W.S.T.) on Tuesday 22 October 2013.

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 queries or concerns, please contact me immediately

Yours sincerely,

[sent electronically without signature]

Dale Allen
Adviser, Listings Compliance (Perth)