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TIGERS REALM COAL
ACN 146 752 561 LIMITED

13 February 2020

Listings Compliance (Melbourne)
Australian Securities Exchange Limited
Level 4, North Tower, Rialto
525 Collins St.
Melbourne. Vic. 3000
Attention Mr. Todd Lewis

Dear Todd,

Your reference ODIN13880 - Appendix 3Y – Change of Director's Interest Notice, Dr Bruce Gray

We refer to your letter dated 12 February, 2020 under the above reference and provide the following responses to the questions raised ;

1. Please explain why the Appendix 3Y was lodged late?

R: A clerical error was made in calculating the number of shares due to Dr Gray under the Entitlement Offer in the 7 January Notice and not picked up until 16 January when the Amended Notice was released.

2. What arrangements does TIG 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?

R: Under Section 5.2 of TIG's Securities Trading Policy Directors must seek prior written clearance before undertaking any Trading in Company Securities. Under Section 5.3 of the Policy Directors must provide the Company Secretary with subsequent written notification of all Trading in Company Securities within two business days. A reminder email is sent prior to blackout periods commencing to ensure no trading is done during that time.

3. If the current arrangements are inadequate or not being enforced , what additional steps does TIG intend to ensure compliance with Listing Rule 3.19B?

R: The Securities Trading Policy will be tabled for review at the next TIG Board meeting to reiterate the obligations of Directors under Listing Rule 3.19B

Yours sincerely

D. J. Forsyth
Company Secretary

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12 February 2020

Reference: ODIN13880

Mr David Forsyth
Company Secretary
Tigers Realm Coal Limited
Level 7
333 Collins Street
Melbourne Australia 3000

By email:

Dear Mr Forsyth

Tigers Realm Coal Limited ('TIG'): Appendix 3Y – Change of Director's Interest Notice Query

ASX refers to the following:

1. TIG's Appendix 3Y lodged on the ASX Market Announcements Platform ('MAP') on 11 February 2020 for Dr Bruce Gray (the 'Notice');

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 that:

   '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.'

The Notice indicates that a change in Dr Gray's notifiable interest occurred on 11 February 2020. It appears that the Notice should have been lodged with ASX by 9 January 2020. Consequently, TIG may have breached

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Listing Rules 3.19A and/or 3.19B. It also appears that Dr Gray may have breached section 205G of the *Corporations Act 2001* (Cth).

Please note that ASX is required to record details of breaches of the Listing Rules by listed entities for its reporting requirements.

ASX reminds TIG of its contract with ASX to comply with the Listing Rules. In the circumstances, TIG should make necessary arrangements to ensure it does not continue to breach the Listing Rules.

Request for Information

Under Listing Rule 18.7, we ask that you answer each of the following questions 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*.

1. Please explain why the Appendix 3Y was lodged late.
2. What arrangements does TIG 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 TIG intend to take to ensure compliance with Listing Rule 3.19B?

When and where to send your response

Your response should be sent to me by e-mail at **ListingsComplianceMelbourne@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, no later than half an hour before the start of trading (i.e. before 9:30 am AEDT) on 17 February 2020.

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.

Enquiries

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

Yours sincerely

Todd Lewis
Adviser, Listings Compliance (Melbourne)