



ABN 33 082 901 362  
Suite 9, 5 Centro Avenue,  
Subiaco WA 6008

21 December 2011

Australian Stock Exchange Limited  
Exchange Plaza  
2 The Esplanade  
Perth WA 6000

Attention: Mr. Mauro Piccini

Dear Mr. Piccini

### **ASX DIRECTORS' INTEREST NOTICE COMPLIANCE**

The ASX has noted the late lodgement of the following notices:

The Appendices 3Y lodged by the Company with ASX Limited ("ASX") on 19 December 2011 for Mr. Michael John Alexander Haynes, Mr. Rhoderick Gordon John Grivas, Mr. Faldi Ismail and Mr. Anthony Brendon Goddard.

As the Appendices 3Y indicated that changes in the directors' relevant interests occurred on 1 December 2011, it appears that the Appendices 3Y should have been lodged with the ASX by 8 December 2011. As the Appendices 3Y were lodged on 19 December 2011, it appears that the Company may be in breach of listing rules 3.19A and/or 3.19B.

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", the ASX has asked that the following questions be answered:

1. Please explain why the Appendices were lodged late.

The late lodgement by 7 business days was due to an administrative oversight.

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?

The Company has outlined its Corporate Governance Policies on its website as read and signed off by the Board of Directors. The Policy includes the requirement that all Directors must notify the Company Secretary of any dealings in the Company's securities immediately any such dealings occur. The policy also includes the following requirements before trading:

Before trading, or giving instructions for trading in the Company's securities, a Director must:

- (a) notify the Chairman of their intention to trade;
- (b) confirm that they do not hold any inside information;
- (c) have been advised by the Chairman that there is no reason to preclude them from trading in the Company's securities as notified; and
- (d) have complied with any conditions on trading imposed by the Chairman (including, for example, any time limits applicable to the clearance).

In the case of a Chairman intending to trade in the Company's securities, they must notify and obtain clearance from the Board before trading, or giving instructions for trading.

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?

The mistake was picked up promptly and the correct action taken immediately. The arrangements listed above are considered adequate and are being enforced.

Yours faithfully

Nicholas Day  
Company Secretary



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  
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[www.asx.com.au](http://www.asx.com.au)

19 December 2011

Mr. Nick Day  
Company Secretary  
Coventry Resources Limited  
Level 2, 675 Murray Street  
WEST PERTH WA 6005

Email: [nday@mqbventures.com](mailto:nday@mqbventures.com)

Dear Nick

**Coventry Resources Limited (the "Company") Appendices 3Y – Director's Interest Notice.**

We refer to the following;

1. The Appendices 3Y lodged by the Company with ASX Limited ("ASX") on 19 December 2011 for Mr Michael John Alexander Haynes, Mr Rhoderick Gordon John Grivas, Mr Faldi Ismail and Mr Anthony Brendon Goddard.
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 Appendices 3Y indicated that changes in the directors' relevant interests occurred on 1 December 2011, it appears that the Appendices 3Y should have been lodged with the ASX by 8 December 2011. As the Appendices 3Y were lodged on 19 December 2011, 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 Appendices 3Y were 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 [mauro.piccini@asx.com.au](mailto:mauro.piccini@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 **Thursday 22 December 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 queries or concerns, please contact me immediately

Yours sincerely,



**Mauro Piccini**  
**Adviser, Issuers (Perth)**