



Ishine International Resources Ltd

17 January 2013

Ms Jill Hewitt
Australian Securities Exchange Limited
Level 8 Exchange Plaza
2 The Esplanade
Perth WA 6000

Dear Jill,

RESPONSE TO ASX QUERY

We have received your letter dated 15 January 2013 concerning the late lodgement of the Appendix 3Y Change of Director's Interest Notice lodged on 14 January 2013.

The Appendix 3Y was lodged late due to an oversight by the Company.

We are aware of the timing deadlines set out in the Listing Rules and the Corporations Act and every endeavour is made to abide by these Rules.

The Company has developed a Share Trading Disclosure Policy to assist Directors and Officers to comply with their disclosure obligations. 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 Company has ensured that the Directors are aware of their responsibility in respect of providing correct information and on time to the Company and the market and we believe the current procedures in place are adequate to facilitate this.

Yours sincerely

Leonard Math
Company Secretary



ASX Compliance Pty Limited
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2 The Esplanade
PERTH WA 6000

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PERTH WA 6840

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15 January 2013

Mr L Math
Company Secretary
Ishine International Limited
14 Emerald Terrace
WEST PERTH WA 6005

Email: leonard@gdacorporate.com.au

Dear Leonard

Ishine International Limited (the "Company") – Director's Interest Notice

We refer to the following;

1. The Appendix 3Y lodged by the Company with ASX on 14 January 2013.
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 1 January 2002.
 - 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 1 January 2002 or 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 indicated that the change occurred on 28 December 2012, it appears that the Appendix should have been lodged with the ASX prior to the close of business on 7 January 2013. As the Appendix was lodged on 14 January 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 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 jill.hewitt@asx.com.au or by facsimile on facsimile number (08) 9221 2020. It should not be sent to the Market 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 (ie before 6.30 a.m. W.S.T.) on Monday, 21 January 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]

Jill Hewitt
Senior Adviser, Issuers Compliance (Perth)