



ALEXIUM INTERNATIONAL GROUP LIMITED
ABN: 91 064 820 408

PO Box 512
Cottesloe WA 6911
Tel: +61 8 9384 3160
Fax: +61 8 6314 1623

4 June 2015

Anjuli Sinniah
ASX Compliance Pty Ltd
GPO Box D187
Perth WA 6840

Dear Anjuli

Please find below our response to your letter dated 3 June 2015 regarding our 3X announcement.

1. Please explain why the Appendix 3X was lodged late.

The release of the 3X on the appointment of Craig Metz was an oversight by the Company. The appendix 3X, being a nil notice, was lodged immediately once it came to the attention of the Company that it had been omitted.

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 an internal policy to ensure that all notices are released in the required timeframe. The Company notes, in relation to this matter, that this was overlooked.

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 current arrangements are adequate and are being enforced.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Kim Lucraft', with a stylized flourish at the end.

Kim Lucraft
Company Secretary



ASX Compliance Pty Limited
ABN 26 087 780 489
Level 40 Central Park
152 – 158 St Georges Terrace
PERTH WA 6000

GPO Box D187
PERTH WA 6840

Telephone 61 8 9224 0000
www.asx.com.au

3 June 2015

Kim Lucraft
Alexium International Group Limited
PO Box 152
CCOTTESLOE WA 6911

By email: KLucraft@alexiuminternational.com

Dear Kim

Alexium International Group Limited (the “Company”)

We refer to the following:

1. The Company's announcement lodged with ASX Ltd (“ASX”) on 22 April 2015 confirming the appointment of Craig Metz (“Appendix 3X”).
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 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 3X indicates that Craig Metz was appointed as director on 1 December 2014 the Appendix 3X should have been lodged with the ASX by 8 December 2014. As the Appendix 3Y was lodged on 22 April 2015 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 3X 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 anjuli.sinniah@asx.com.au. It should not be sent to ASX Market Announcements.

A response is requested as soon as possible and, in any event, not later than **3:00 pm WST on Friday 5 June 2015**.

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]

Anjuli Sinniah
Adviser, Listings Compliance (Perth)