

17 May 2013

Ms T Oliveira
ASX Limited
Exchange Plaza
Level 8, 2 The Esplanade
PERTH WA 6000

Dear Tonia,

APPENDIX 3X - EXPLANATION FOR LATE LODGMENT OF INITIAL DIRECTORS INTEREST NOTICE

Having regard to ASX Listing Rule 3.19A and 3.19B, the Company makes the following submission in relation to the late lodgement of the Appendix 3X:

1. *Explain why the Appendix 3x was lodged late.*

The Company Secretary made an administrative oversight and failed to ensure that the Appendix 3X had been lodged.

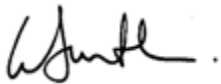
2. *What arrangements does the Company have in place with its directors to ensure that it is able to meet its disclosure obligations under LR 3.19*

This error was not caused by a fault or omission of the Director but by an error of the Company Secretary.

3. *If the current arrangements are inadequate or not being enforced, what additional steps does the Company intend to take to ensure compliance with LR3.19B*

The Company considers the current arrangements to be adequate.

Yours faithfully,



Graeme Smith
Company Secretary

Pluton Resources Limited

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www.asx.com.au

17 May 2013

Mr Graeme Smith
Company Secretary
Pluton Resources Limited

By Email: graeme@dwcorporate.com

Dear Graeme

Pluton Resources Limited (the "Company")

We refer to the following:

1. The Company's announcement lodged with ASX Ltd ("ASX") on 15 May 2013 regarding the initial directors' interest notice for Mr Lau Yu ("Yu 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 an 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 an 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 an Appendix 3Z and give it to ASX no more than 5 business days after the director ceases to be a director.

4. 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.



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5. 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.

The Yu Appendix 3X indicates that Mr Yu was appointed as a director of the Company on 1 May 2013 so it should have been lodged with ASX by 8 May 2013. As the Yu Appendix 3X was lodged on 15 May 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 Yu 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 email to tonia.oliveira@asx.com.au or by facsimile on facsimile number (08) 9221 2020. It should not be sent to the ASX Market Announcements Office.

A response is requested as soon as possible and, in any event, not later than **5:00PM (WST) on Monday 20 May 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 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]

Tonia Oliveira
Senior Adviser, Listings Compliance (Perth)