



26 June 2012

Shreeshant Prabhakaran
Adviser, Listings (Perth)
ASX Compliance Pty Ltd
Level 8, Exchange Plaza
2 The Esplanade
Perth WA 6000

Dear Shreeshant

Response to ASX Query: Appendix 3Y

I refer to your letter dated 25 June 2012 to Viking Ashanti Limited (the **Company**), and respond to your queries as follows:

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

The delay in lodgement of the Appendix 3Y for John William Gardner arose due to an administrative oversight. Notification of the acquisition of shares had been made to the Company by the directors as required and in compliance with the Company's Securities Dealing Policy.

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

The Company has a Securities Dealing Policy which requires Directors to notify the Company as soon as practicable (and no later than 5 business days) after they have bought or sold the Company's securities or exercised options.

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 Company considers that the current arrangements are adequate, and are being enforced. The reason for the late lodgement of the Appendix was not due to a lack of enforcement of these arrangements, or a lack of information provided by the Director in question, but simply due to an inadvertent administrative oversight by the Company. The Company will continue to comply with listing rule 3.19B by ensuring that the Company's Directors disclose to the Company all the relevant details required by the Company to give ASX completed notices within the time frame specified by listing rule 3.19A.

Yours sincerely

Mike Langoulant
Company Secretary



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25 June 2012

Mr Michael Langoulant
Company Secretary
Viking Ashanti Limited

By email: mike@dwyresources.com

Dear Michael

Viking Ashanti Limited (the "Company") – Appendix 3Y

We refer to the following:

1. The Appendix 3Y Change of Director's Interest Notice for Mr John William Gardner regarding a change in his interests which occurred on 15 June 2012 (the "Gardner 3Y");
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.

The Gardner 3Y indicates that a change in Mr Gardner's notifiable interests occurred on 15 June 2012 so the Appendix 3Y should have been lodged with ASX by 22 June 2012. As the Gardner 3Y was lodged on 24 June 2012, 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 Gardner 3Y 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 facsimile on facsimile number (08) 9221 2020 or by email to shree.prabhakaran@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 **5:00pm (WST) on Thursday 28 June 2012**.

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]

Shreeshant Prabhakaran
Adviser, Listings (Perth)