

ASX Announcement

4 May 2021

Change of Director's Interest Notice

Atrum Coal Limited (ASX: ATU) (**Atrum** or the **Company**) provides the attached Appendix 3Y for Company Director Charles Fear. The Company notes the purchase of shares occurred during a blackout period where exceptional circumstances must exist, and prior written approval must be granted to trade during such periods pursuant to the Company's securities trading policy (Trading Policy).

Mr. Fear sought and received prior approval on 6 April 2021 for the purchase of Atrum shares on market outside of a blackout period. The buy order was not filled at the time and due to an administrative oversight, the buy order was left active and filled during a blackout period.

The trades occurred in the three days prior to lodgement of the Company's quarterly results (101,730 shares with a value of \$5,595) and over 1 hour after the quarterly results had been lodged and released on the ASX platform (398,270 shares with a value of \$21,905).

The Trading Policy restricts trading in securities in the week prior to the lodgement of quarterly results and in the 2 days after lodgement of quarterly results. The Board considers that the quarterly results did not include any inside material information that influenced Mr. Fear's trading in Company securities.

The Company and Directors are committed to meeting their obligations not to trade in Company securities at times when they are, or may be perceived to be, in possession of market sensitive information concerning the Company that is not generally available to investors. In accordance with ASX Listing Rule 12.9 and good governance principles, the Board has adopted a Securities Trading Policy which sets out blackout periods in which Directors and Key Management Personnel must not, except in exceptional circumstances deal in securities of the Company. These blackout periods are included in a Company corporate calendar which is circulated to the Board monthly and is a standing Board paper item at the monthly meetings of the Board of Directors.

The Board considers this an isolated incident and notes that no prior trading during blackout periods has previously occurred to its knowledge. However, the Company will review its current practices regarding trading in Company securities to ensure that all future trading occurs in strict compliance with the Trading Policy. No disciplinary action will be taken by Atrum, however, the Company will conduct further training and education in relation to its Trading Policy and require additional notifications be provided for blackout trading periods.

Atrum has in place a procedure whereby any intended change in Directors' interest and transactions in ATU securities by the Directors are notified prior to the change occurring and again following the change, to ensure that Atrum can meet its disclosure obligations under listing rule 3.19A and disclose any changes to ASX within 5 business days. Further, at monthly Board meetings, Directors are reminded of their obligations regarding disclosure when dealing in Company securities and must confirm their holdings in Company securities as detailed in monthly Board papers and announced to ASX are correct.

The Company confirms it is in compliance with the ASX Listing Rules, in particular ASX Listing Rule 3.1.

This ASX release was authorised on behalf of the Atrum Board by:

Andrew Caruso, Managing Director and CEO

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Appendix 3Y

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Information or documents not available now must be given to ASX as soon as available. Information and documents given to ASX become ASX's property and may be made public.

Introduced 30/09/01 Amended 01/01/11

Name of entity ATRUM COAL LIMITED
ABN 27 153 876 861

We (the entity) give ASX the following information under listing rule 3.19A.2 and as agent for the director for the purposes of section 205G of the Corporations Act.

Name of Director	Charles FEAR
Date of last notice	21 December 2020

Part 1 - Change of director's relevant interests in securities

In the case of a trust, this includes interests in the trust made available by the responsible entity of the trust

Note: In the case of a company, interests which come within paragraph (i) of the definition of "notifiable interest of a director" should be disclosed in this part.

Direct or indirect interest	Indirect
Nature of indirect interest (including registered holder) <small>Note: Provide details of the circumstances giving rise to the relevant interest.</small>	Areley Kings Pty Ltd ATF RAEF A/C Mr Fear is a director Areley Kings Pty Ltd and a beneficiary of the RAEF A/C.
Date of change	27 – 30 April 2021
No. of securities held prior to change	Areley Kings Pty Ltd ATF C Fear Super A/C 3,000,000 Ordinary fully paid shares Areley Kings Pty Ltd ATF RAEF A/C 4,800,000 Ordinary fully paid shares 1,375,000 Unlisted options 1,000,000 Performance Rights
Class	Ordinary fully paid shares
Number acquired	500,000 Shares
Number disposed	Nil

+ See chapter 19 for defined terms.

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Value/Consideration Note: If consideration is non-cash, provide details and estimated valuation	\$27,500
No. of securities held after change	Areley Kings Pty Ltd ATF C Fear Super A/C 3,000,000 Ordinary fully paid shares Areley Kings Pty Ltd ATF RAEF A/C 5,300,000 Ordinary fully paid shares 1,375,000 Unlisted options 1,000,000 Performance Rights
Nature of change Example: on-market trade, off-market trade, exercise of options, issue of securities under dividend reinvestment plan, participation in buy-back	Shares purchased on market.

Part 2 – Change of director's interests in contracts

Note: In the case of a company, interests which come within paragraph (ii) of the definition of "notifiable interest of a director" should be disclosed in this part.

Detail of contract	N/A
Nature of interest	N/A
Name of registered holder (if issued securities)	N/A
Date of change	N/A
No. and class of securities to which interest related prior to change Note: Details are only required for a contract in relation to which the interest has changed	N/A
Interest acquired	N/A
Interest disposed	N/A
Value/Consideration Note: If consideration is non-cash, provide details and an estimated valuation	N/A
Interest after change	N/A

Part 3 – +Closed period

Were the interests in the securities or contracts detailed above traded during a +closed period where prior written clearance was required?	Yes
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If so, was prior written clearance provided to allow the trade to proceed during this period?	No
If prior written clearance was provided, on what date was this provided?	N/A

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