

9 October 2017

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Neometals Ltd ACN 099 116 631

Dear Sebastian

## RESPONSE TO PRICE QUERY

We refer to your letter dated 9 October 2017 to Neometals Ltd (ASX: NMT) (“**Neometals**” or the “**Company**”).

The Company responds to the queries in your letter as follows:

1. No.
2. Not applicable.
3. The Company notes that there has been a general increase in market sentiment for companies in the lithium sector in recent weeks with a number of companies across the sector experiencing significant share price appreciation.
4. The Company confirms that it is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.
5. I confirm that the Company’s response to the questions raised in your letter is in accordance with the Company’s published continuous disclosure policy.

Yours faithfully

Jason Carone  
**COMPANY SECRETARY**



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9 October 2017

Jason Carone  
Neometals Limited  
1292 Hay Street  
WEST PERTH WA 6005

By email

Dear Mr Carone

**NEOMETALS LIMITED (“NMT”): ASX PRICE AND VOLUME QUERY**

We note the change in the price of NMT securities from a closing price of \$0.34 on Friday, 6 October 2017, to an intra-day high at the time of writing of \$0.37 today, Wednesday, 9 October 2017.

We also note an increase in the volume of NMT’s securities traded in the past few days.

In light of this, ASX asks NMT to answer separately each of the following questions and provide the following confirmations in a format suitable for release to the market in accordance with Listing Rule 18.7A:

1. Is NMT aware of any information concerning it that has not been announced to the market which, if known by some in the market, could explain the recent trading in its securities?
2. If the answer to question 1 is “yes”:
  - a) Is NMT relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1?  
  
Please note that the recent trading in NMT’s securities would suggest to ASX that such information may have ceased to be confidential and therefore NMT may no longer be able to rely on Listing Rule 3.1A. Accordingly, if the answer to this question is “yes”, you need to contact us immediately to discuss the situation.
  - b) Can an announcement be made immediately?  
  
Please note, if the answer to this question is “no”, you need to contact us immediately to discuss requesting a trading halt (see below).
  - c) If an announcement cannot be made immediately, why not and when is it expected that an announcement will be made?
3. If the answer to question 1 is “no”, is there any other explanation that NMT may have for the recent trading in its securities?
4. Please confirm that NMT is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.

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5. Please confirm that NMT's responses to the questions above have been authorised and approved in accordance with its published continuous disclosure policy or otherwise by its board or an officer of NMT with delegated authority from the board to respond to ASX on disclosure matters.

#### **When and where to send your response**

This request is made under, and in accordance with, Listing Rule 18.7. Your response is required as soon as reasonably possible and, in any event, **by not later than 3.00 pm (WST) today, Monday, 9 October 2017**. If we do not have your response by then, ASX will have no choice but to consider suspending trading in NMT's securities under Listing Rule 17.3.

You should note that if the information requested by this letter is information required to be given to ASX under Listing Rule 3.1 and it does not fall within the exceptions mentioned in Listing Rule 3.1A, NMT's obligation is to disclose the information "immediately". This may require the information to be disclosed before the deadline set out in the previous paragraph.

ASX reserves the right to release a copy of this letter and your response on the ASX Market Announcements Platform under Listing Rule 18.7A. Accordingly, your response should be in a form suitable for release to the market.

Your response should be **sent to me by e-mail** at [tradinghaltspert@asx.com.au](mailto:tradinghaltspert@asx.com.au). It should **not** be sent directly to the ASX Market Announcements Office. This is to allow me to review your response to confirm that it is in a form appropriate for release to the market, before it is published on the ASX Market Announcements Platform.

#### **Listing Rules 3.1 and 3.1A**

Listing Rule 3.1 requires a listed entity to give ASX immediately any information concerning it that a reasonable person would expect to have a material effect on the price or value of the entity's securities. Exceptions to this requirement are set out in Listing Rule 3.1A.

In responding to this letter, you should have regard to NMT's obligations under Listing Rules 3.1 and 3.1A and also to Guidance Note 8 *Continuous Disclosure: Listing Rules 3.1 – 3.1B*.

It should be noted that NMT's obligation to disclose information under Listing Rule 3.1 is not confined to, nor is it necessarily satisfied by, answering the questions set out in this letter.

#### **Trading halt**

If you are unable to respond to this letter by the time specified above, or if the answer to question 1 is "yes" and an announcement cannot be made immediately, you should discuss with us whether it is appropriate to request a trading halt in NMT's securities under Listing Rule 17.1.

If you wish a trading halt, you must tell us:

- the reasons for the trading halt;
- how long you want the trading halt to last;
- the event you expect to happen that will end the trading halt;
- that you are not aware of any reason why the trading halt should not be granted; and
- any other information necessary to inform the market about the trading halt, or that we ask for.



We may require the request for a trading halt to be in writing. The trading halt cannot extend past the commencement of normal trading on the second day after the day on which it is granted.

You can find further information about trading halts in Guidance Note 16 *Trading Halts & Voluntary Suspensions*.

If you have any queries or concerns about any of the above, please contact me immediately.

Yours sincerely

*[Sent electronically without signature]*

Sebastian Bednarczyk  
**Senior Adviser, ASX Listings Compliance (Perth)**

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