



ARCHER MATERIALS LIMITED  
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12 February 2020

Mr Alex Sutton  
ASX Compliance Pty Limited  
20 Bridge St  
Sydney NSW 2000

By email: [Maria.Clemente@asx.com.au](mailto:Maria.Clemente@asx.com.au) and [Alex.Sutton@asx.com.au](mailto:Alex.Sutton@asx.com.au) ;

Dear Maria,

### **Response to price query**

We refer to a price query by the Australian Securities Exchange dated 12 February 2020

In response to the specific questions of the price query and using the same numbering;

1. The Company is not aware of any information concerning it that has not been announced which, if known, may explain the recent trading pattern in the securities of Archer Materials Limited.
2. Not applicable.
3. Aside from information already publicly released, the Company is not aware of any explanation for the recent price decrease and increase in volume of shares traded.
4. Archer Materials Limited confirms that it is in compliance with the ASX listing rules and, in particular, with listing rule 3.1.
5. The Company confirms that this letter has been approved by its board.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Damien Connor', written over a horizontal line.

**Damien Connor**  
Company Secretary  
Archer Materials Limited (ASX:AXE)



12 February 2020

Reference: 013887

Mr Damien Connor  
Company Secretary  
Archer Materials Limited

By email: d.connor@archerx.com.au

Dear Mr Connor

### **Archer Materials Limited ('AXE'): Price Query**

We note the change in the price of AXE's securities from a high of \$0.23 on 11 February 2020 to a low of \$0.17 today.

We also note the significant increase in the volume of AXE's securities traded from 11 February 2020 to 12 February 2020.

### **Request for Information**

In light of this, ASX asks AXE to respond separately to each of the following questions and requests for information:

1. Is AXE 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 AXE relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in AXE's securities would suggest to ASX that such information may have ceased to be confidential and therefore AXE 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 AXE may have for the recent trading in its securities?
4. Please confirm that AXE is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that AXE's responses to the questions above have been authorised and approved under its published continuous disclosure policy or otherwise by its board or an officer of AXE 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 Listing Rule 18.7. Your response is required as soon as reasonably possible and, in any event, by no later than **3:00 PM AEDT today Wednesday, 12 February 2020**. If we do not have your response by then, ASX will likely suspend trading in AXE's securities under Listing Rule 17.3. You should note

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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, AXE'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. 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 AXE'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 AXE'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 AXE'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*.

### **Suspension**

If you are unable to respond to this letter by the time specified above ASX will likely suspend trading in AXE's securities under Listing Rule 17.3.

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**Enquiries**

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

Yours sincerely

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**Maria Clemente**

Adviser, Listings Compliance (Sydney)