

28 May 2020

Alex Sutton  
Advisor Listings Compliance (Sydney)  
Australian Securities Exchange

Sent via email: Alex.Sutton@asx.com.au  
ListingsComplianceSydney@asx.com.au.

Dear Mr. Sutton,

### **Odin Metals Limited – Price Query**

We refer to your letter dated 27 May 2020 regarding recent increases in the Company's share price and volume of trading. We respond to the questions that you have raised as follows:

**1. Is ODM 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?**

The Company is not aware of any information concerning it that has not been announced which, if known, could be an explanation for recent trading in the securities of the Company.

**2. If the answer to question 1 is "yes".**

**a) Is ODM relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in ODM's securities would suggest to ASX that such information may have ceased to be confidential and therefore ODM 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.**

Not applicable.

**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).**

Not applicable.

**c) If an announcement cannot be made immediately, why not and when is it expected that an announcement will be made?**

Not applicable.

**3. If the answer to question 1 is "no", is there any other explanation that ODM may have for the recent trading in its securities?**

No, the Company does not have any other explanation for the price change or increase in volume in the securities.

**Registered Address:**

Ground floor, 35 Richardson Street, WEST PERTH WA 6005

E: [admin@odinmetals.com.au](mailto:admin@odinmetals.com.au)

W: [www.odinmetals.com.au](http://www.odinmetals.com.au)



**4. Please confirm that ODM is complying with the Listing Rules and, in particular, Listing Rule 3.1.**

The Company is in compliance with the listing rules and in particular, listing rule 3.1 relating to continuous disclosure and the requirement for immediate notice of material information.

**5. Please confirm that ODM'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 ODM with delegated authority from the board to respond to ASX on disclosure matters.**

The Company confirms that its response has been authorised and approved by officers of the Company that have delegated authority from the Board to respond to ASX disclosure matters.

For further information please visit [www.odinmetals.com.au](http://www.odinmetals.com.au) or contact:

Jason Bontempo - Executive Director

Telephone: +61 8 6117 0447

Email [info@odinmetals.com.au](mailto:info@odinmetals.com.au)



27 May 2020

Mr Aaron Bertolatti  
Company Secretary  
Odin Metals Limited

By email:

Dear Mr Bertolatti

### **Odin Metals Limited ('ODM'): Price Query**

We note the change in the price of ODM's securities from a low of \$0.035 to a high of \$0.05 in the last few days.

We also note the significant increase in the volume of ODM's securities traded from 25 May 2020 to 27 May 2020.

### **Request for Information**

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

1. Is ODM 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 ODM relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in ODM's securities would suggest to ASX that such information may have ceased to be confidential and therefore ODM 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 ODM may have for the recent trading in its securities?
4. Please confirm that ODM is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that ODM'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 ODM 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 **09:30 AM AEST today Thursday, 28 May 2020**. If we do not have your response by then, ASX will likely suspend trading in ODM'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, ODM's obligation is to disclose the

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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 [ListingsComplianceSydney@asx.com.au](mailto:ListingsComplianceSydney@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 ODM’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 ODM’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 ODM’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 ODM’s securities under Listing Rule 17.3.

### **Enquiries**

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

Kind regards



**Alex Sutton**



Compliance Adviser, Geology, Listings Compliance (Sydney)