



**COPPERMOLY**  
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## ASX Announcement

19 July 2021

ASX Code: COY

Corey Lian  
Advisor, Listings  
ASX Compliance  
Exchange Centre  
20 Bridge Street  
SYDNEY NSW 2000

By email: [ListingsComplianceSydney@asx.com.au](mailto:ListingsComplianceSydney@asx.com.au)

### Coppermoly Limited – Response to ASX Price Query

I refer to the letter dated 19 July 2021 wherein the ASX notes an increase in the price of Coppermoly Limited's securities (ASX: COY) and a significant increase in the volume of trading in the Company's securities during the course of trading on 19 July 2021.

The Company provides the following responses to the ASX's queries:

1. *Is COY 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 which, if known, could explain the recent trading in its securities.**

*In responding to this question, please consider in particular whether COY is aware of any information that its earnings for the 12-month period ending on 30 June 2021:*

- (a) *are likely to differ materially (downwards or upwards) from any earnings guidance it has given for the period; or*

**COY has not provided any earnings guidance for the period.**

- (b) *if COY has not given any earnings guidance for the period, are otherwise likely to come as a surprise to the market (by reference to analyst forecasts for the period or, if COY is not covered by analysts, its earnings for the prior corresponding period)?*

**No.**

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

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

**The Company is not aware of any other explanation for the recent trading in its securities.**

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

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

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

**I confirm that the responses above have been authorised and approved in accordance with the Company's continuous disclosure policy.**

Yours sincerely

A handwritten signature in dark ink, appearing to read 'Stephen Kelly', written in a cursive style.

**Stephen Kelly**  
**Company Secretary**



19 July 2021

Reference: 36722

Mr Stephen Kelly  
Company Secretary  
Coppermoly Limited

By email:

**Dear Mr Kelly**

**Coppermoly Limited ('COY'): Price - Query**

ASX refers to the following:

- A. The change in the price of COY's securities from a low of \$0.013 to a high of \$0.019 today.
- B. The significant increase in the volume of COY's securities trading during the first hour of the trading session today.

**Request for information**

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

- 1. Is COY 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?

In responding to this question, please consider in particular whether COY is aware of any information that its earnings for the 12 month period ending on 30 June 2021:

- (a) are likely to differ materially (downwards or upwards) from any earnings guidance it has given for the period; or
  - (b) if COY has not given any earnings guidance for the period, are otherwise likely to come as a surprise to the market (by reference to analyst forecasts for the period or, if COY is not covered by analysts, its earnings for the prior corresponding period)?
- 2. If the answer to question 1 is "yes".
  - (a) Is COY relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in COY's securities would suggest to ASX that such information may have ceased to be confidential and therefore COY 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 COY may have for the recent trading in its securities?
- 4. Please confirm that COY is complying with the Listing Rules and, in particular, Listing Rule 3.1.

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5. Please confirm that COY'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 COY 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 **1:30 PM AEST Monday, 19 July 2021**. 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, COY'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 and may require COY to request a trading halt immediately.

Your response should be sent to me by e-mail at **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.

#### **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 COY'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 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 COY's securities under Listing Rule 17.3.

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

In responding to this letter, you should have regard to COY'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 COY'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.

#### **Release of correspondence between ASX and entity**

We reserve the right to release a copy of this letter, your reply and any other related correspondence between us to the market under Listing Rule 18.7A.

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## Questions

If you have any questions in relation to the above, please do not hesitate to contact me.

Kind regards

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**Corey Lian**  
Compliance Adviser, Listings Compliance (Sydney)