

5 June 2017

Mr James Rowe  
ASX Compliance Pty Ltd  
Level 40, Central Park  
152-158 St Georges Terrace  
PERTH WA 6000

By email: [James.Rowe@asx.com.au](mailto:James.Rowe@asx.com.au)  
[tradinghaltspert@asx.com.au](mailto:tradinghaltspert@asx.com.au)

Dear Mr Rowe,

### Response to ASX Aware Query

Mount Ridley Mines Limited (ASX: MRD) ("the Company") acknowledges receipt of your correspondence dated 1 June 2017 (*attached*) and responds to the questions set out in that letter as follows using the same numbering as your letter.

- 1 Yes, the Company considers the Information in the Announcement or any part thereof to be information that a reasonable person would expect to have a material effect on the price or value of its securities.
- 2 Not applicable.
- 3 Drilling the third hole (plate B) was completed early evening of Friday, 26 May 2017. Down hole surveying for this plate was completed later that evening. Plates A and C (C being the largest EM amplitude) were completed late on Wednesday, 31 May 2017.
- 4 No, the Company believed at that time that it did not have sufficient material and complete information to release to the market.
- 5 The Company confirms that it is in compliance with the Listing Rules and, in particular Listing Rule 3.1.
- 6 The Company confirms that the responses above have been authorised and approved in accordance with its published continuous disclosure policy or otherwise by its board or an officer of the Company with delegated authority from the board to respond to ASX on disclosure matters.

For and on behalf of the Board



Mr Ashley Hood  
**Managing Director**



1 June 2017

Mr Keith Bowker  
Company Secretary  
Mount Ridley Mines Limited  
PO Box 964  
West Perth WA 6872

**By Email**

Dear Mr Keith

**Mount Ridley Mines Ltd (“MRD”): aware query**

ASX Limited (“ASX”) refers to the following.

A. The following recent change in the price of the MRD’s securities:

Date	Open	High	Low	Close	%
26 May 2017	\$0.013	\$0.013	\$0.012	\$0.013	0
29 May 2017	\$0.012	\$0.013	\$0.01	\$0.01	(23.08%)
30 May 2017	\$0.01	\$0.01	\$0.009	\$0.01	0
31 May 2017	\$0.01	\$0.01	\$0.008	\$0.008	(20%)
1 June 2017	\$0.007	\$0.0075	\$0.005	\$0.005	(37.5%)

B. MRD’s announcement entitled “Exploration Update” lodged on the ASX Market Announcements Platform and released at 11:07:01 am AEST on 1 June 2017 (the “Announcement”), disclosing that all three electromagnetic plates (A, B & C) have been completed with diamond drilling. The announcement included the following statement:

*To date Plate B has recorded a reduced size off hole conductor, in which the Company will evaluate and follow up on completion of final modelling. Plate A also detected an off hole conductor, however the possible source is past the detection / modelling point. Plate C results have not returned a conclusive source of the anomaly detected during the surface HPMLTEM survey program.*

(the “Information”)

C. Listing Rule 3.1, which 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.

D. The definition of “aware” in Chapter 19 of the Listing Rules, which states that:

*“an entity becomes aware of information if, and as soon as, an officer of the entity (or, in the case of a trust, an officer of the responsible entity) has, or ought reasonably to have, come into possession of the information in the course of the performance of their duties as an officer of that entity”*

and section 4.4 in Guidance Note 8 *Continuous Disclosure: Listing Rules 3.1 – 3.1B* “When does an entity become aware of information”.

- E. Listing Rule 3.1A, which sets out exceptions from the requirement to make immediate disclosure, provided that each of the following are satisfied.

*“3.1A Listing rule 3.1 does not apply to particular information while each of the following is satisfied in relation to the information:*

*3.1A.1 One or more of the following applies:*

- *It would be a breach of a law to disclose the information;*
- *The information concerns an incomplete proposal or negotiation;*
- *The information comprises matters of supposition or is insufficiently definite to warrant disclosure;*
- *The information is generated for the internal management purposes of the entity; or*
- *The information is a trade secret; and*

*3.1A.2 The information is confidential and ASX has not formed the view that the information has ceased to be confidential; and*

*3.1A.3 A reasonable person would not expect the information to be disclosed.”*

- F. ASX’s policy position on the concept of “confidentiality”, which is detailed in section 5.8 of Guidance Note 8 *Continuous Disclosure: Listing Rules 3.1 – 3.1B*. In particular, the Guidance Note states that:

*“Whether information has the quality of being confidential is a question of fact, not one of the intention or desire of the listed entity. Accordingly, even though an entity may consider information to be confidential and its disclosure to be a breach of confidence, if it is in fact disclosed by those who know it, then it ceases to be confidential information for the purposes of this rule.”*

Having regard to the above, ASX asks MRD to respond separately to each of the following questions and requests for information:

1. Does MRD consider the Information in the Announcement or any part thereof to be information that a reasonable person would expect to have a material effect on the price or value of its securities?
2. If the answer to question 1 is “no”, please advise the basis for that view.
3. When did MRD first become aware of the Information or any part thereof?
4. If MRD first became aware of the Information or any part thereof before 1 June 2017, did MRD make any announcement prior to 1 June 2017 which disclosed the Information or any part thereof? If so,

please provide details. If not, please explain why the information was not released to the market at an earlier time, commenting specifically on when you believe MRD was obliged to release the information under Listing Rules 3.1 and 3.1A and what steps MRD took to ensure that the Information was released promptly and without delay.

5. Please confirm that MRD is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.
6. Please confirm that MRD'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 MRD 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 7.00 a.m. WST on 5 June 2017. If we do not have your response by then, ASX will have no choice but to consider suspending trading in MRD'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, MRD'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 [tradinghaltsp Perth@asx.com.au](mailto:tradinghaltsp Perth@asx.com.au). It should not be sent directly to the ASX Market Announcements Office. This is to allow ASX 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**

In responding to this letter, you should have regard to MRD'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 MRD'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, you should discuss with us whether it is appropriate to request a trading halt in MRD'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]*

James Rowe  
Manager, Listings Compliance  
P:08 9224 0001  
E: james.rowe@asx.com.au