



22 February 2018

Ms Hayley Pratt  
ASX Compliance

By Email: [Hayley.Pratt@asx.com.au](mailto:Hayley.Pratt@asx.com.au)

Dear Ms Pratt,

In response to your correspondence of 22 February 2018 regarding the increased volume and price of Gladiator Resources Limited ("GLA") securities please find the following.

1. GLA is not aware of any information concerning the company that has not been announced to the market which, if known by some in the market, could explain the recent increased trading volume of its securities.
2. Not Applicable.
3. GLA is not able to provide an explanation for the recent trading in the company's securities.
4. GLA is in full compliance with ASX Listing Rules and in particular ASX Listing Rule 3.1.
5. GLA's responses to ASX's questions have been authorised and approved by the company's board in accordance with its continuous disclosure policy.

Yours Sincerely,

A handwritten signature in blue ink, appearing to read "Andrew Draffin", is positioned above the typed name.

Andrew Draffin  
Company Secretary



22 February 2018

Mr Andrew Draffin  
Director and Company Secretary  
Gladiator Resources Limited  
Level 4  
91 William Street  
MELBOURNE VIC 3000

By email: [adraffin@draffingwalker.com.au](mailto:adraffin@draffingwalker.com.au)

Dear Mr Draffin

**Gladiator Resources Limited (“GLA”): price query**

We note the change in the price of GLA’s securities from a low of \$0.003 yesterday, Wednesday 21 February 2018 to an intraday high of \$0.007 today, Thursday 22 February 2018.

We also note the increase in the volume of GLA’s securities traded today.

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

1. Is GLA 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 GLA relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1?

Please note that the recent trading in GLA’s securities would suggest to ASX that such information may have ceased to be confidential and therefore GLA 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 GLA may have for the recent trading in its securities?
4. Please confirm that GLA is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.

5. Please confirm that GLA'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 GLA 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 **12:30 pm AWST on Thursday 22 February 2018**. If we do not have your response by then, ASX will have no choice but to consider suspending trading in GLA'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, GLA'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 [Hayley.Pratt@asx.com.au](mailto:Hayley.Pratt@asx.com.au) and to [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 GLA'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 GLA'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 GLA'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]*

Hayley Pratt

**Adviser – Listings Compliance (Perth)**