



16 March 2018

**ASX Code: MTB**

Ms Isabelle Andrews  
Adviser  
Listings Compliance (Perth)  
ASX Compliance Pty Ltd  
Level 40 Central Park  
Perth WA 6000

Dear Ms Andrews,

In regard to your letter of 16 March 2018, please find below responses to the six queries raised by ASX.

**1. Does MTB consider the information (or part thereof), being the assay results for the following drill holes:**

**a. KRC204;**

**b. KDD203;**

**c. KDD202;**

**d. KDD201;**

**e. KDD109;**

**f. KDD206;**

**g. KDD126;**

**h. KDD200;**

***to be information that a reasonable person would expect to have a material effect on the price or value of its securities? In answering the question please provide a response for each drill hole.***

In response to Query 1

a. KRC204;	NO
b. KDD203;	NO
c. KDD202;	NO
d. KDD201;	NO
e. KDD109;	NO
f. KDD206;	NO
g. KDD126;	NO
h. KDD200;	NO

2. *If the answer to question 1 is “no”, please advise the basis for that view.*

a) **KRC204 (actually KDD204)**

Upon receipt of the assay data and initial review by technical personnel working on developing the Kihabe Zinc, Lead, Silver and Germanium Deposit, the Vanadium values were not selected as being necessary for reporting to ASX. Accordingly, so far as the Vanadium assay values were concerned, the Company **did not** believe that this was information that a reasonable person would expect to have a material effect on the price or value of its securities.

b) **KDD203**

Upon receipt of the assay data and initial review by technical personnel working on developing the Kihabe Zinc, Lead, Silver and Germanium Deposit, the Vanadium values were not selected as being necessary for reporting to ASX. Accordingly, so far as the Vanadium assay values were concerned, the Company **did not** believe that this was information that a reasonable person would expect to have a material effect on the price or value of its securities.

c) **KDD202**

Upon receipt of the assay data and initial review by technical personnel working on developing the Kihabe Zinc, Lead, Silver and Germanium Deposit, the Vanadium values were not selected as being necessary for reporting to ASX. Accordingly, so far as the Vanadium assay values were concerned, the Company **did not** believe that this was information that a reasonable person would expect to have a material effect on the price or value of its securities.

d) **KDD201**

Upon receipt of the assay data and initial review by technical personnel working on developing the Kihabe Zinc, Lead, Silver and Germanium Deposit, the Vanadium values were not selected as being necessary for reporting to ASX. Accordingly, so far as the Vanadium assay values were concerned, the Company **did not** believe that this was information that a reasonable person would expect to have a material effect on the price or value of its securities.

e) **KDD109**

Upon receipt of the assay data and initial review by technical personnel working on developing the Kihabe Zinc, Lead, Silver and Germanium Deposit, the Vanadium values were not selected as being necessary for reporting to ASX. Accordingly, so far as the Vanadium assay values were concerned, the Company **did not** believe that this was information that a reasonable person would expect to have a material effect on the price or value of its securities.

f) **KDD 206**

Upon receipt of the assay data and initial review by technical personnel working on developing the Kihabe Zinc, Lead, Silver and Germanium Deposit, the Vanadium values were not selected as being necessary for reporting to ASX. Accordingly, so far as the Vanadium assay values were concerned, the Company **did not** believe that this was information that a reasonable person would expect to have a material effect on the price or value of its securities.

**g) KDD 126**  
Upon receipt of the assay data and initial review by technical personnel working on developing the Kihabe Zinc, Lead, Silver and Germanium Deposit, the Vanadium values were not selected as being necessary for reporting to ASX. Accordingly, so far as the Vanadium assay values were concerned, the Company **did not** believe that this was information that a reasonable person would expect to have a material effect on the price or value of its securities.

**h) KDD 200**  
Upon receipt of the assay data and initial review by technical personnel working on developing the Kihabe Zinc, Lead, Silver and Germanium Deposit, the Vanadium values were not selected as being necessary for reporting to ASX. Accordingly, so far as the Vanadium assay values were concerned, the Company **did not** believe that this was information that a reasonable person would expect to have a material effect on the price or value of its securities.

**3. When did MTB first become aware of the information in respect of each of the following drill holes:**

In response to Query 3:

- a. KRC204  
(KDD 204) 16 January 2018 multiple assays including Vanadium received from Lab
- b. KDD203 16 January 2018 multiple assays including Vanadium received from Lab
- c. KDD202 29 December 2017 multiple assays including Vanadium received from Lab
- d. KDD201 29 December 2017 multiple assays including Vanadium received from Lab
- e. KDD109 2 July 2007 multiple assays including Vanadium received from Lab
- f. KDD206 16 January 2018 multiple assays including Vanadium received from Lab
- g. KDD126 6 March 2008 multiple assays including Vanadium received from Lab
- h. KDD200 18 December 2017 multiple assays including Vanadium received from Lab

**4. If MTB first became aware of the information before the relevant date, did MTB make any announcement prior to the relevant date which disclosed the information? If so, please provide details. If not, please explain why this information was not released to the market at an earlier time, commenting specifically on when you believe MTB was obliged to release the information under Listing Rules 3.1 and 3.1A and what steps MTB took to ensure that the information was released promptly and without delay.**

In response to Query 4:

MTB first became aware of the information before the relevant date (Announcement Date).

MTB did not make any announcement in relation to Vanadium assays in respect of the Drill Holes listed in 1 and 3 above prior to today's announcement.

It was only upon a subsequent in-depth review of the Vanadium results from the above HQ diamond drill holes, when reviewed in association with any previous Vanadium results from **the area outlined as Zone 1** in today's announcement, which were mainly from historical RC holes, that a firm trend of Vanadium mineralisation was seen as emerging. This was in early March 2018. (It should be noted that the Company did not always assay drill holes for Vanadium as its focus was the Zinc/Lead/Silver resource.)

MTB was not able to release this information to the market any earlier than it did. From 9 March 2018, when it appeared there could be a trend with Vanadium mineralisation, information had to be compiled from assay data from recent drill holes and historical drill holes. This involved MTB staff working on the compilation of data, even over the weekend to ensure that the information was released promptly and without delay. This involved:

- extracting information from archived databases
- assembling that data on Sections with recent drill hole assay results
- assessing the combined data to see if it warranted further advancement
- meeting with Metallurgical Consultant to determine if there was any future for advancing the Vanadium aspect of the Company's Zinc/Lead/Silver/Germanium Project
- compiling the data in accordance with the ASX Listing Rules (JORC 2012) requirements in preparation of an announcement
- having the data independently and professionally reviewed and approved and signed off by a Competent Person which was done at **9 pm on 15 March 2018** last night.
- Lodging the announcement the following morning (**today**).

***5. Please confirm that MTB is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.***

In response to Question 5 as far as it is aware MTB is in compliance with the Listing Rules and in particular with Listing Rule 3.1.

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

In answer to **Question 6**, MTB confirms that its responses to the questions above have been authorised and approved by Nigel Raymond Forrester, FCA (ICAEW), CEO of MTB, with delegated authority from the MTB Board to respond to ASX on disclosure matters.

## **IN CONCLUSION**

MTB believes that it is necessary to consider **all** 16 drill holes that were included in the announcement being queried. Results from 8 of the 16 drill holes had previously been announced to the market in May, June, September, October and December 2006, so all this information is in the public domain. There is a significant difference between the Vanadium price today and that of

2006. Consequently the results that were released in 2006 would today be viewed relative to current prices.

As announced today further geological modelling is underway to assess the grade and continuity of the four Vanadium domains in relation to the existing resource area and **the information will be released to the market once complete.**

Yours sincerely,

A handwritten signature in black ink, appearing to be 'Nigel Forrester', written over a circular scribble.

**Nigel Forrester FCA (ICAEW)  
CEO**

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16 March 2018

Mr Nigel Forrester  
Chairman  
Mount Burgess Mining NL  
8/800 Albany Highway  
East Victoria Park WA 6101

By email: Nigel@mountburgess.com

Dear Mr Forrester

**Mount Burgess Mining NL (“MTB”) aware query**

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

- A. MTB’s announcement entitled “Vanadium Mineralisation - Kihabe Project Botswana” lodged on the ASX Market Announcements Platform and released at 10:43:13 am on Friday 16 March 2018 (the “Announcement”), disclosing previously unannounced mineralised intersections of Vanadium at the following drill holes:
- a) KRC204;
  - b) KDD203;
  - c) KDD202;
  - d) KDD201;
  - e) KDD109;
  - f) KDD206;
  - g) KDD126;
  - h) KDD200.
- B. The change in the price of MTB’s securities from a low of \$0.007 to an intra-day high of \$0.014 today, Friday 16 March 2018.
- 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 MTB to respond separately to each of the following questions and requests for information:

1. Does MTB consider the information (or part thereof), being the assay results for the following drill holes:
  - a. KRC204;
  - b. KDD203;
  - c. KDD202;
  - d. KDD201;
  - e. KDD109;
  - f. KDD206;

g. KDD126;

h. KDD200;

to be information that a reasonable person would expect to have a material effect on the price or value of its securities? In answering the question please provide a response for each drill hole.

2. If the answer to question 1 is “no”, please advise the basis for that view.
3. When did MTB first become aware of the information in respect of each of the following drill holes:
  - a. KRC204;
  - b. KDD203;
  - c. KDD202;
  - d. KDD201;
  - e. KDD109;
  - f. KDD206;
  - g. KDD126;
  - h. KDD200?
4. If MTB first became aware of the information before the relevant date, did MTB make any announcement prior to the relevant date which disclosed the information? If so, please provide details. If not, please explain why this information was not released to the market at an earlier time, commenting specifically on when you believe MTB was obliged to release the information under Listing Rules 3.1 and 3.1A and what steps MTB took to ensure that the information was released promptly and without delay.
5. Please confirm that MTB is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.
6. Please confirm that MTB’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 MTB 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 **6.30 a.m. WST on Monday 19 March 2018**. If we do not have your response by then, ASX will have no choice but to consider suspending trading in MTB’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, MTB’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 [wade.baggott@asx.com.au](mailto:wade.baggott@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 for the review of your response and 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 MTB'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 MTB'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 MTB'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]*

Isabelle Andrews  
Adviser Listings Compliance (Perth)  
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E: [isabelle.andrews@asx.com.au](mailto:isabelle.andrews@asx.com.au)