



27 June 2018

Mr Emerson Walker  
Advisor, Listings Compliance (Perth)  
ASX Limited  
Level 40 Central Park  
152-158 St Georges Terrace  
Perth WA 6000

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

Dear Mr Walker

**RE: Price Query**

We refer to your letter dated 27 June 2018 sent to our office, with respect to the change in price of securities of Brockman Mining Limited (the Company) from 31 May 2018 to today.

Using the numbering in your letter we respond as follows:

1. The only information of which the Company is aware which has not previously been released to market is that the Board has today resolved to consider the disposal of a non-core asset of the Group (the Luchun copper mine in PRC). The disposal, if materialized, will not bring significant cash inflow to the Group, but it is expected that the Group can realise a non-cash gain on the disposal of the asset due to the net liability position of the assets to be disposed of (subject to further review and confirmation by the auditors). The disposal is not expected to be a notifiable transaction under the Listing Rules in Hong Kong and ASX. The Company will make further announcement to confirm the actual gain on disposal when appropriate.
2. A separate announcement regarding this proposed transaction has been released to market.
3. The Company is not aware of any other explanation for the recent trading in its securities.
4. We confirm that the Company is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.
5. We confirm that the above responses to your questions have been authorised and approved in accordance with the Company's published continuous disclosure policy.

Yours sincerely

Colin Paterson  
Director

27 June 2018

**Mr Colin Paterson**

Company Secretary  
Brockman Mining Limited  
Level 2, 56 Ord Street  
West Perth WA 6005

By email: colinpaterson@brockman.com

Dear Mr Paterson

**Brockman Mining Limited (the "Entity"): price query**

We note the change in the price of BCK's securities from a low of \$0.02 to a high of \$0.05 from 31 May 2018 to today.

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

1. Is BCK 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 BCK is aware of any information that its earnings for the 12 month period ending on 27 June 2018:

- a) are likely to differ materially (downwards or upwards) from any earnings guidance it has given for the period; or
- b) if BCK 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 BCK is not covered by analysts, its earnings for the prior corresponding period)?

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

- a) Is BCK relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1?

Please note that the recent trading in BCK's securities would suggest to ASX that such information may have ceased to be confidential and therefore BCK 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 BCK may have for the recent trading in its securities?

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4. Please confirm that BCK is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.
  5. Please confirm that BCK'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 BCK 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 half an hour before the start of trading (ie before 7.30 am WST) on 28 June 2018. If we do not have your response by then, ASX will have no choice but to consider suspending trading in BCK'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, BCK'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 [emerson.walker@asx.com.au](mailto:emerson.walker@asx.com.au) and [tradinghaltsperth@asx.com.au](mailto:tradinghaltsperth@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 BCK'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 BCK'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 BCK's securities under Listing Rule 17.1.

If you wish to request 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*.

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

Kind regards

*[Sent electronically without signature]*

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**Emerson Walker**

Adviser, Listings Compliance (Perth)