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10 July 2019

Mr Daniel Nicholson Adviser Listings Compliance (Perth) ASX Limited Perth WA 6000

E: ListingsCompliancePerth@ASX.com.au

Dear Mr Nicholson

Re: Price Query

In response to your letter dated 9 July 2019 we respond to your questions as follows:

1. Is PRX 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?

No, whilst the Company is releasing an update for the Euro exploration project today (10 July 19), none of the results contained in the announcement are considered material to the market or would explain the recent trading in the Company's securities.

Refer to Question 3 for further comment on the Company's recent activities and upcoming results.

- 2. If the answer to question 1 is "yes".
  - (a) Is PRX relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in PRX's securities would suggest to ASX that such information may have ceased to be confidential and therefore PRX 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 PRX may have for the recent trading in its securities?

Patersons Securities published a detailed independent research note approximately 1:13pm (9 July 2019). This note highlights the nickel and high grade cobalt intersections announced on the Grimlock Prospect at the Lake Mackay JV with IGO (ASX Announcement 16 May 2019), the additional joint venture with Newmont (ASX Announcement 30 May 2019) and summarises drilling activity recently completed or underway (ASX Announcement 27 June 2019). The increase in market price and volume occurred shortly after the release of this research note.

Prodigy Gold is a very active mineral exploration company with the Company as well as various joint venture partners exploring on Prodigy Gold's tenements simultaneously.

The Company released on 27 June 2019 an exploration update on its 100% owned gold projects including information about

- the aircore drilling program undertaken at the Bluebush project
- securing co-funding for two projects from the NT Government under the Resourcing the Territory Initiative
- the continuation of an RC drilling program at the Lake Mackay JV Project with IGO and a diamond drilling program at the Euro project with Newcrest.

On 30 May 2019 the Company informed the market about high grade cobalt results intersected by IGO at the Grimlock Prospect.

A \$14.5M farm-in and joint venture agreement was signed with Newmont Goldcorp over the Company's Tobruk project as announced on 16 May 2019.

Furthermore, negotiations are continuing with parties interested in Buccaneer and Old Pirate. None of the negotiations are at a stage which would warrant an announcement.

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

The Company confirms that it is in compliance with the ASX Listing rules and, in particular, Listing Rule 3.1 and that all information that a reasonable person would expect to have a material effect on the price or value of PRX's securities has been fully disclosed.

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

The Company confirms that PRX's responses to the questions above have been authorised and approved in accordance with its published continuous disclosure policy.

Signed

Jutta Zimmermann Company Secretary



9 July 2019

Reference: 04021

Ms Jutta Zimmerman Company Secretary Prodigy Gold NL

By email

Dear Ms Zimmerman

### Prodigy Gold NL ('PRX'): Price and Volume Query

We note the change in the price of PRX's securities from a low of \$0.092 at close of trade on 2 July 2019 to an intraday high of \$0.130 at the time of writing, today, 9 July 2019.

We also note the significant increase in the volume of PRX's securities traded from 2 July 2019 to 9 July 2019.

#### **Request for Information**

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

- 1. Is PRX 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 PRX relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in PRX's securities would suggest to ASX that such information may have ceased to be confidential and therefore PRX 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 PRX may have for the recent trading in its securities?
- 4. Please confirm that PRX is complying with the Listing Rules and, in particular, Listing Rule 3.1.
- 5. Please confirm that PRX'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 PRX 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 **7:00 AM AWST**, **Wednesday**, **10 July 2019**. If we do not have your response by then, ASX will likely suspend trading in PRX'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, PRX'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 <u>ListingsCompliancePerth@asx.com.au</u>. 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 PRX'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 PRX'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 PRX'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.

#### Suspension

If you are unable to respond to this letter by the time specified above ASX will likely suspend trading in PRX's securities under Listing Rule 17.3.

# **Enquiries**

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

Yours faithfully

**Daniel Nicholson** 

Adviser, Listings Compliance (Perth)