



9 September 2019

Daniel Nicholson
Adviser, Listings Compliance (Perth)
ASX Limited
Level 40, 152-158 St George's Terrace
PERTH WA 6000

Via email: ListingsCompliancePerth@asx.com.au

Dear Daniel

PRICE QUERY

PolarX Limited ("the Company") refers to your letter dated 9 September 2019 and responds as follows:

1. The Company is not 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 the securities of the Company.
2. Not applicable.
3. The Company is not able to offer any other explanation for the recent trading in its securities, other than:
 - (i) the announcement of 6 August 2019 in relation to the results of an Induced Polarisation survey over the Saturn target within the Company's Alaska Range Project, that identified large anomalies which are consistent with the targeted copper-gold porphyry mineralization. That announcement also advised that an initial diamond drilling program had commenced at the Saturn target (**2019 Drill Program**); and
 - (ii) anticipated drill results from the 2019 Drill Program.
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 Company's responses 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.

Yours sincerely

Ian Cunningham
Company Secretary



9 September 2019

Reference: 06857

Mr Ian Cunningham
Company Secretary
PolarX Limited

By email

Dear Mr Cunningham

PolarX Limited ('PXX'): Price and Volume Query

We note the change in the price of PXX's securities from a low of \$0.088 at close on Friday, 6 September 2019, to a high of \$0.115 at the time of writing, today, 9 September 2019.

We also note the significant increase in the volume of PXX's securities traded from 6 September 2019 to 9 September 2019.

Request for Information

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

1. Is PXX 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 PXX relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in PXX's securities would suggest to ASX that such information may have ceased to be confidential and therefore PXX 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 PXX may have for the recent trading in its securities?
4. Please confirm that PXX is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that PXX'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 PXX 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 **4:30 PM AWST today Monday, 9 September 2019**. If we do not have your response

by then, ASX will likely suspend trading in PXX'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, PXX'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 ListingsCompliancePerth@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 PXX'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 PXX'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 PXX'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 PXX'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)