

22 April 2015

Mr Elvis Onyura  
Senior Adviser, Listings Compliance (Sydney)  
ASX Compliance Pty Ltd  
20 Bridge Street  
SYDNEY NSW 2000

Dear Mr Onyura

**ASX PRICE QUERY**

We refer to the price query received from the ASX on 21 April 2015 and respond to the specific questions asked:

- 1. Is the Company 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. The Company is not aware of any information concerning it that has not been announced to the market, that 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 the Company relying on Listing Rule 3.1A not to announce under Listing Rule 3.1?**
  - b. Can an announcement be made immediately?**
  - c. If an announcement cannot be made immediately, why not and when is it expected that an announcement will be made?**

The answer to question 1 is no—therefore, question 2 is not applicable.

- 3. If the answer to question 1 is "no", is there any other explanation that the Entity may have for the recent trading in its securities?**

The Company is continually intersecting high grade nickel mineralisation on potentially one of the world's largest nickel laterite deposits, as previously announced.

The Company will appear in the Solomon Islands Court of Appeal hearing over these world class Isabel nickel deposits on 26 May 2015, which it believes to be the last litigation event.



Last year, the Company convincingly defended its rights over the Isabel nickel deposits against Sumitomo Metal Mining in the Solomon Islands High Court.

This has allowed the Company to develop the asset with the aim of bringing the project into production by the end of the year, in a region where nickel laterite consumers have been deprived of high grade ore.

**4. Please confirm that the Company is in compliance with the listing rules and, in particular, listing rule 3.1.**

The Company is in compliance with Listing Rule 3.1

Yours sincerely

A handwritten signature in black ink, appearing to read "R. Mount", with a long horizontal stroke extending to the right.

Ryan Mount  
Chief Executive Officer



21 April 2015

Mr Ryan Mount / Mr Sailesh Solanki  
Director / Chief Financial Officer  
Axiom Mining Limited  
Unit 6  
76 Doggett Street  
Newstead QLD 4006

By email

Dear Messrs Mount & Solanki,

**Axiom Mining Limited (the "Company"): ASX Price Query**

We have noted a change in the price of the Company's securities from a low of 15 cents on Tuesday, 14 April 2015 to a close of 21.5 cents at the time of writing today, Tuesday, 21 April 2015.

We also note an increase in the trading volume of the Company's securities.

In light of the price and volume increase, ASX asks you to respond separately to each of the following questions:

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

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

## 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 **9.30 a.m. AEST**) on **Wednesday, 22 April 2015**. If we do not have your response by then, ASX will have no choice but to consider suspending trading in the Company'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, the Company'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 [eonyura@asx.com.au](mailto:eonyura@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 Rule 3.1

Listing Rule 3.1 requires a listed Company 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 Company's securities. Exceptions to this requirement are set out in Listing Rule 3.1A.

The obligation of the Company to disclose information under Listing Rules 3.1 and 3.1A is not confined to, nor is it necessarily satisfied by, answering the questions set out in this letter.

In responding to this letter, you should have regard to the Company's obligations under Listing Rules 3.1 and 3.1A and also to Guidance Note 8 *Continuous Disclosure: Listing Rules 3.1 – 3.1B*.

## 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 the Company'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]*

Elvis Onyura

**Senior Adviser, Listings Compliance (Sydney)**