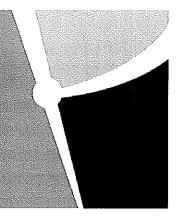
# POSEIDONNICKEL



15 November 2012 POSECORICORRESPONDENCEIC630

Mr W Baggott Senior Adviser, Listings (Perth) ASX Compliance Pty Limited Level 8 Exchange Plaza 2 The Esplanade PERTH WA 6000 BY EMAIL

Dear Wade

## **Price and Volume Query**

We refer to your query letter dated 15<sup>th</sup> November 2012 regarding the price and volume movements of Poseidon Nickel Limited ("the Company"). The Company wishes to advise the following:

- 1. The Company is not aware of any information that has not already been announced which might explain the recent trading in the Securities of the Company.
- 2. Not Applicable.
- 3. There is no other explanation that may explain the price and volume changes in the securities of the Company other than recent announcements. The Company announced on 13 November 2012 that it had gained a significant new Shareholder in Jefferies Bank who has acquired Company Shares and Convertible Notes from Harbinger Capital Partners. In addition, on 12 November 2012, the Company announced that it had received the necessary environmental and construction approvals for the Project from the State Government.
- 4. The Company confirms it is in compliance with the Listing Rules and in particular, Listing Rule 3.1.

Should there be any further queries, please do not hesitate to contact our office.

Ross Kestel

Company Secretary



ASX Compliance Pty Limited ABN 26 087 780 489 Level 8 Exchange Plaza 2 The Esplanade PERTH WA 6000

> GPO Box D187 PERTH WA 6840

Telephone 61 8 9224 0000 Facsimile 61 8 9221 2020 www.asx.com.au

15 November 2012

Ross Kestel Company Secretary Poseidon Nickel Limited Unit 8, Churchill Court 3310-335 Hay Street SUBIACO WA 6008

By email

Dear Ross

Poseidon Nickel Limited (the "Company")

### PRICE AND VOLUME QUERY

We have noted a change in the price of the Company's securities from a closing price of \$0.105 on Friday 9 November 2012 to a closing price of \$0.14 today. We have also noted an increase in the volume of trading in the securities over this period.

In light of the price and volume change, please respond to each of the following questions.

- 1. Is the Company aware of any information concerning it that has not been announced which, if known, could be an explanation for recent trading in the securities of the Company?
  - Please note that as recent trading in the Company's securities could indicate that information has ceased to be confidential, the Company is unable to rely on the exceptions to listing rule 3.1 contained in listing rule 3.1A when answering this question.
- 2. If the answer to question 1 is yes, can an announcement be made immediately? If not, why not and when is it expected that an announcement will be made?
  - Please note, if the answer to question 1 is yes and an announcement cannot be made immediately, you need to contact us to discuss this and you need to consider a trading halt (see below).
- 3. Is there any other explanation that the Company may have for the price change in the securities of the Company?
- 4. Please confirm that the Company is in compliance with the listing rules and, in particular, listing rule 3.1.

Your response should be sent to me by email to <a href="mailto:wade.baggott@asx.com.au">wade.baggott@asx.com.au</a> or on facsimile number +61 8 9221 2020. It should not be sent to ASX Market Announcements.

Unless the information is required immediately under listing rule 3.1, a response is requested as soon as possible and, in any event, not later than half an hour before the commencement of trade (6:30am WST) on Friday 16 November 2012.

Under listing rule 18.7A, a copy of this query and your response will be released to the market, so your response should be in a suitable form and separately address each of the questions asked. If you have any queries or concerns, please contact me immediately.

#### Listing rule 3.1

Listing rule 3.1 requires an 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. The exceptions to this requirement are set out in listing rule 3.1A.

In responding to this letter you should consult listing rule 3.1 and Guidance Note 8 – Continuous Disclosure: listing rule 3.1.

If the information requested by this letter is information required to be given to ASX under listing rule 3.1 your obligation is to disclose the information immediately.

Your responsibility under listing rule 3.1 is not confined to, or necessarily satisfied by, answering the questions set out in this letter.

#### Trading halt

If you are unable to respond by the time requested, or if the answer to question 1 is yes and an announcement cannot be made immediately, you should consider a request for a trading halt in the Company's securities. As set out in listing rule 17.1 and Guidance Note 16 – Trading Halts, we may grant a trading halt at your request. We may require the request to be in writing. We are not required to act on your request. You must tell us each of the following:

- 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.

The trading halt cannot extend past the commencement of normal trading on the second day after the day on which it is granted. If a trading halt is requested and granted and you are still unable to reply to this letter before the commencement of trading, suspension from quotation would normally be imposed by us from the commencement of trading if not previously requested by you. The same applies if you have requested a trading halt because you are unable to release information to the market, and are still unable to do so before the commencement of trading.

If you have any queries regarding any of the above, please do not hesitate to contact me.

Yours sincerely

[sent electronically without signature]

Wade Baggott Senior Adviser, Listings (Perth)