



Ms. Ash Aziz  
Adviser  
Listing Compliance  
ASX Compliance  
525 Collins Street, Rialto  
South Tower, Level 50  
Melbourne VIC 3000

20<sup>th</sup> May 2025

Dear Ms. Aziz,

**RE: BOUGAINVILLE COPPER LIMITED (BOC): PRICE QUERY – REFERENCE ODIN109401**

I refer to your letter of 20<sup>th</sup> May 2025. In response to your specific questions, we reply as follows:

1. Is BOC 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?

**Response: No.**

2. If the answer to question 1 is “yes”.

(a) Is BOC relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in BOC’s securities would suggest to ASX that such information may have ceased to be confidential and therefore BOC 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?

**Response: Not applicable given our response to 1. Above.**

3. If the answer to question 1 is “no”, is there any other explanation that BOC may have for the recent trading in its securities?

**Response: No. BOC is not aware of any reason for the price change, and increase in the volume of BOC’s securities traded.**

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

**Response: BOC is in compliance with the listing rules, and in particular, Listing Rule 3.1.**

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

**Response: BOC responses to the questions above have been authorised and approved in accordance with the company's published continuous disclosure policy. The Company Secretary has delegated authority from the Board to respond to the ASX on disclosure matters.**

Yours sincerely



**Johnny Auna**  
**Company Secretary**





20 May 2025

Reference: ODIN109401

Mr Johnny Auna  
Chief Executive Officer  
Bougainville Copper Limited  
Level 5/ BSP Haus, Konedobu  
Port Moresby, NCD, Papua New Guinea, 121

By email: Johnny.Auna@bcl.com.pg

Dear Mr Auna

**Bougainville Copper Limited ('BOC'): Price - Query**

ASX refers to the following:

- A. The change in the price of BOC's securities from a close of \$0.34 on 19 May 2025 to a high of \$0.395 today.
- B. The significant increase in the volume of BOC's securities traded today.

**Request for information**

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

1. Is BOC 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 BOC relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in BOC's securities would suggest to ASX that such information may have ceased to be confidential and therefore BOC 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 BOC may have for the recent trading in its securities?
4. Please confirm that BOC is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that BOC'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 BOC with delegated authority from the board to respond to ASX on disclosure matters.

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### 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 **2:00 PM AEST on Tuesday, 20 May 2025**. 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, BOC'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 and may require BOC to request a trading halt immediately.

Your response should be sent by e-mail to **ListingsComplianceMelbourne@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.

### 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 BOC'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 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 BOC's securities under Listing Rule 17.3.

### Listing Rules 3.1 and 3.1A

In responding to this letter, you should have regard to BOC'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 BOC'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.

### Release of correspondence between ASX and entity

ASX reserves the right to release all or any part of this letter, your reply and any other related correspondence between us to the market under Listing Rule 18.7A.

Regards

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ASX Compliance