



May 18, 2021

Australian Stock Exchange
Level 4, North Tower, Rialto
152-158 St George's Terrace
Perth WA 6000
Australia

Via E-mail: ListingsCompliancePerth@asx.com.au

Attn: Elizabeth Harris

Dear Elizabeth

Copper Mountain Mining Corporation – C6C – New Director Filing

As requested by your letter dated May 17, 2021 we are writing in response to our Initial Director's Interest filing that was made of May 10, 2021 for Paula Rogers. As noted in our press release issued March 5, 2021 we announced the addition of Paula Rogers to the Board of Director's of the Company at that point in time.

Unfortunately, we did not notice that the Initial Directors Report was not lodged on the ASX Online filing system until May 10th, 2021 and at that point in time it was determined that a report was missing. We immediately lodged the directors initial report as required by listing rules 3.19. It should be noted that Paula Rogers does not hold any shares in the Company at this time, so this was nothing more than an initial nil filing.

When a new director joins the board, they immediately become an insider and must inform the Company of their share position, if any. This in turn would be filed with the ASX and SEDI in Canada.

Copper Mountain has recently hired an inhouse legal person who will be joining the Company on June 7th. At that point in time I will be transitioning my role of corporate secretary to him and going forward he will ensure filings are not overlooked and made on a timely basis.

I confirm that these responses are authorized responses to the questions in your letter dated May 17, 2021 and I am authorized to answer the above.

Sincerely

A handwritten signature in blue ink, appearing to read "Rodney A Shier".

Rodney A Shier, CPA,CA
Chief Financial Officer



17 May 2021

Mr Rodney Shier
Company Secretary
Copper Mountain Mining Corporation

By email: Rod@CuMtn.com

Dear Mr Shier

Copper Mountain Mining Corporation ('C6C'): Appendix 3X – Initial Director's Interest Notice Query

ASX refers to the following:

1. C6C's Appendix 3X lodged on the ASX Market Announcements Platform ('MAP') on 10 May 2021 for Ms Rogers (the 'Notice');
2. Listing Rule 3.19A which requires an entity to tell ASX the following:

3.19A.1 *'The notifiable interests of a director of the entity (or in the case of a trust, a director of the responsible entity of the trust) at the following times.*

- *On the date that the entity is admitted to the official list.*
- *On the date that a director is appointed.*

The entity must complete Appendix 3X and give it to ASX no more than 5 business days after the entity's admission or a director's appointment.

3.19A.2 *A change to a notifiable interest of a director of the entity (or in the case of a trust, a director of the responsible entity of the trust) including whether the change occurred during a closed period where prior written clearance was required and, if so, whether prior written clearance was provided. The entity must complete Appendix 3Y and give it to ASX no more than 5 business days after the change occurs.*

3.19A.3 *The notifiable interests of a director of the entity (or in the case of a trust, a director of the responsible entity of the trust) at the date that the director ceases to be a director. The entity must complete Appendix 3Z and give it to ASX no more than 5 business days after the director ceases to be a director.'*

3. Listing rule 3.19B which states that:

'An entity must make such arrangements as are necessary with a director of the entity (or in the case of a trust, a director of the responsible entity of the trust) to ensure that the director discloses to the entity all the information required by the entity to give ASX completed Appendices 3X, 3Y and 3Z within the time period allowed by listing rule 3.19.A. The entity must enforce the arrangements with the director.'

As the Notice indicated that Ms Rogers was appointed on 3 March 2021, it appears that the Notice should have been lodged with ASX by 10 March 2021. As the Notice was lodged on 10 May 2021, it appears that C6C may have breached listing rules 3.19A and/or 3.19B. It also appears that Ms Rogers may have breached section 205G of the *Corporations Act 2001* (Cth).

Request for Information

Under Listing Rule 18.7, we ask that you answer each of the following questions having regard to Listing Rules 3.19A and 3.19B and *Guidance Note 22: Director Disclosure of Interests and Transactions in Securities - Obligations of Listed Entities*.

1. Please explain why the Appendix 3X was lodged late.
2. What arrangements does C6C have in place under Listing Rule 3.19B with its directors to ensure that it is able to meet its disclosure obligations under Listing Rule 3.19A?
3. If the current arrangements are inadequate or not being enforced, what additional steps does C6C intend to take to ensure compliance with Listing Rule 3.19B?
4. Please confirm that C6C'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 C6C 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 **12:00 PM AWST Thursday, 20 May 2021**. 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, C6C'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 C6C to request a trading halt immediately.

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.

Trading halt

If you are unable to respond to this letter by the time specified above, you should discuss with us whether it is appropriate to request a trading halt in C6C'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 C6C's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

In responding to this letter, you should have regard to C6C'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 C6C'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

We reserve the right to release a copy of this letter, your reply and any other related correspondence between us to the market under Listing Rule 18.7A.

Questions

If you have any questions in relation to the above, please do not hesitate to contact me.

Yours sincerely

Elizabeth Harris
Manager, Listings Compliance (Perth)