

12 October 2015

ASX Compliance Pty Limited  
Level 40, Central Park  
152-158 St Georges Terrace  
Perth WA 6000

Attention: Dale Allen Adviser,  
Listings Compliance (Perth)

By email

Dear Dale,

I refer to your letter of 8 October 2015 and advise as follows, in response to the questions raised:

1. Yes.
2. The Company was relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1.

As announced to the ASX on 7 September 2015, the Company has entered into final definitive documentation with General Mining Corporation (**GMM**) regarding the restart and operation of the Mt Cattlin spodumene and tantalum mine in Ravensthorpe, WA (**Project**).

Under these arrangements, GMM has a right to conduct and manage activities at the Project on an exclusive basis to bring it back into operation.

GMM engaged Entech Pty Ltd to conduct an independent review of GMM's Mt Cattlin open pit operations financial model (**Review**).

At 9.58pm on Wednesday, 7 October 2015, the Company received from GMM a final draft of the Review. The Company began considering the content of the draft Review on Thursday, 8 October 2015.

The Company believed that the draft Review was not at a point where an immediate announcement could be made as it was in draft form and incomplete. The Company also believed that the confidentiality of the contents of the draft Review had been maintained.

At 10.42am on 8 October 2015, in response to your price and volume enquiry and the trading halt of GMM's securities, the Company requested a trading halt of its securities.

At 4.07pm on Thursday 8 October 2015, GXY received the completed Review.

An announcement in relation to the Review has been made by GMM earlier this morning and is available on the GMM's ASX platform.

3. N/A

4. The Company confirms it is in compliance with ASX listing rules, and in particular, Listing Rule 3.1

Yours sincerely

A handwritten signature in black ink, appearing to read "S. Robertson".

Simon Robertson  
**Company Secretary**



8 October 2015

Mr Simon Robertson  
Company Secretary  
Galaxy Resources Limited  
Level 1, 16 Ord Street  
WEST PERTH WA 6005

*By Email: [simon@slrconsulting.com.au](mailto:simon@slrconsulting.com.au)*

Dear Mr Robertson

**Galaxy Resources Limited ("the Entity")**

**PRICE AND VOLUME QUERY**

We have noted a change in the price of the Entity's securities from a close of \$0.039 on 7 October 2015 to an intra-day high of \$0.044 today, 8 October 2015. We have also noted an increase in the volume of trading in the Entity's securities over this period.

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

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

Please note that the recent trading in the Entity's securities would suggest to ASX that such information may have ceased to be confidential and therefore the Entity 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 Entity may have for the recent trading in its securities?



4. Please confirm that the Entity 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 **1p.m. WST on Thursday 8 October 2015**. If we do not have your response by then, ASX will have no choice but to consider suspending trading in the Entity'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 Entity'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 on [dale.allen@asx.com.au](mailto:dale.allen@asx.com.au) and [tradinghaltspert@asx.com.au](mailto:tradinghaltspert@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 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.

The obligation of the Entity 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 Entity'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 Entity'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]*

Dale Allen

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