



**Axiom Mining Limited**  
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19 October 2017

Mr Adrian Smythe  
Manager, Listing Compliance Announcements Office  
ASX Limited  
Exchange Centre  
Level 4, 20 Bridge Street  
Sydney NSW 2000

**By email: [adrian.smythe@asx.com.au](mailto:adrian.smythe@asx.com.au)**

#### **Axiom Mining Limited (“AVQ”): Price Query**

We refer to the price query received from the ASX on 19 October 2017 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, but refer to comments in response to Question 3.

2. *If the answer to question 1 is “yes”:  
Is the Company relying on Listing Rule 3.1A not to announce under Listing Rule 3.1?  
Can an announcement be made immediately?  
If an announcement cannot be made immediately, why not and when is it expected that an announcement will be made?*

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 confirms the following information:

- Axiom continues to progress its nickel and cobalt exploration and mining applications with the Solomon Islands Government and remains confident and is working towards a successful outcome;
- Exploration and pre-development activities continue on the Company’s Solomon Island projects to the extent allowable under its current licences;
- There has been recent speculation in Solomon Islands press and online investor forums. Earlier this year Axiom stated in its Rights Issue Prospectus, when referencing its pending licence applications *“That the company is aware of market speculation in the Solomon Islands press and other online investor forums....In considering any investment in the Company, shareholders should rely on the information provided by the Company...”*. Axiom encourages its shareholders to rely on its ASX announcements for material information; and
- The Company continues to pursue Sumitomo in an ongoing Contempt of Court hearing resulting from previously alleged spreading of misinformation about the Company and its activities.

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

Yes, the Company is in compliance with Listing Rule 3.1.

5. *Please confirm that AVQ's responses to the questions above have been authorised and approved in accordance with its published continuous disclosure policy or otherwise by its board or an officer of AVQ with delegated authority from the board to respond to ASX on disclosure matters.*

Responses to the questions above have been authorised and approved by an officer of the Company with delegated authority from the board to respond to ASX on disclosure matters.

Yours faithfully

A handwritten signature in black ink, appearing to read 'David Kinsman', with a long horizontal flourish extending to the right.

David Kinsman  
Company Secretary (Local Agent)



19 October 2017

Mr David Kinsman  
Chief Financial Officer and Company Secretary  
Axiom Mining Limited  
Level 6, 15 Astor Terrace  
Spring Hill QLD 4000

By email: david.kinsman@axiom-mining.com

Dear Mr Kinsman

**Axiom Mining Limited (“AVQ”): price query**

We note the change in the price of AVQ’s securities from a close of \$0.225 on Monday, 16 October 2017 to a low of \$0.155 this morning at the time of writing.

We also note the increase in the volume of AVQ’s securities traded over this period.

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

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

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

5. Please confirm that AVQ's responses to the questions above have been authorised and approved in accordance with its published continuous disclosure policy or otherwise by its board or an officer of AVQ 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, 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 1:00 pm AEDT today. If we do not have your response by then, ASX will have no choice but to consider suspending trading in AVQ'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, AVQ'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 [adrian.smythe@asx.com.au](mailto:adrian.smythe@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 Rules 3.1 and 3.1A**

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.

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

### **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 AVQ'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]*

Adrian Smythe  
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