



ASX Announcement

6 July 2021

Ms Vanessa Nevjestic
Adviser, ASX Listings Compliance (Perth)
Dear Vanessa,

RESPONSE TO PRICE AND VOLUME QUERY

POSEIDON NICKEL LTD ('the Company') (ASX:POS)

We refer to your letter dated 1 July 2021 with respect to the subject matter and respond to your queries in the same order as raised:

1. No. However, the Company notes the ASX announcement *Further drilling results add to high grade continuity* dated 16 June 2021 which reported that two (2) metres of massive sulphides had been observed in Hole PGSD025 during the drilling program currently being conducted on the Company's Golden Swan mineralised zone, for which the Company was awaiting assays. The Company had not yet received these assay results as at 1 July 2021. These results have subsequently been received by the Company and released to the market in the announcement titled *Golden Swan Drilling and DHEM Update* dated 6 July 2021. This announcement also notes assay results for holes PGSD026 and PGSD029 have been received which contained no significant assay results. The Company is not aware of any other information concerning it that has not been announced, which, if known, could be an explanation for recent trading in the securities of the Company.
2. Not applicable.
3. No, the Company does not have any other explanation for the price change and volume traded in the securities, however we note a recent article on www.livewiremarkets.com that references the Company in addition to a number of other companies. This article was re-posted to the Company's Twitter account and LinkedIn page on 30 June 2021. The Company re-post most media articles pertaining to the Company on these two social media platforms. The content of the post was of a general nature regarding the Company and there was no reference made to the current drilling program or pending drilling and/or assay results.
4. The Company is and remains in compliance with the Listing Rules and, in particular, Listing Rule 3.1.
5. The above has been authorised and approved in accordance with the Company's published Continuous Disclosure Policy or otherwise by its Board or an officer of the Company with delegated authority from the Board to respond to ASX on disclosure matters.

Yours faithfully,



Andrea Betti
Company Secretary

*This announcement was authorised for release by Peter Harold, Managing Director & CEO,
of Poseidon Nickel Limited.*

For personal use only



1 July 2021

Reference: ODIN36344

Ms Andrea Betti
Company Secretary
Poseidon Nickel Limited
Level 1, 3 Ord Street
West Perth, Western Australia 6005

By email: Andrea.Betti@poseidon-nickel.com.au

Dear Ms Betti

Poseidon Nickel Limited ('POS'): Price and Volume - Query

ASX refers to the following:

- A. The change in the price of POS's securities from an intraday low of \$0.082 on 30 June 2021 to an intraday high of \$0.110 today.
- B. The significant increase in the volume of POS's securities traded from 30 June 2021 to 1 July 2021.

Request for information

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

1. Is POS 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 POS relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in POS's securities would suggest to ASX that such information may have ceased to be confidential and therefore POS 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 POS may have for the recent trading in its securities?
4. Please confirm that POS is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that POS'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 POS 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 **4.30 PM AWST Thursday, 1 July 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, POS'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 POS 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, 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 POS'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 POS's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

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

Vanessa Nevjestic
Adviser, Listings Compliance (Perth)