

Madeleine Green
Senior Adviser, Listings Compliance (Perth)

Via email: ListingsCompliancePerth@asx.com.au

Dear Madeleine

ASX Price and Volume Query

I refer to your letter dated 15 December 2020 to Kogi Iron Limited (KFE or the Company). The Company responds to each of your questions as follows:

1. Is KFE 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?

Kogi Response: The Company is not aware of any such information.

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

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

Kogi Response: Not applicable.

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

Kogi Response: The Company notes that it held its Annual General Meeting today commencing 1pm ACDT. However, there was no information provided at this meeting that was not otherwise in the market. There was no formal presentation provided at the meeting, as the Company had already provided an update to shareholders (refer ASX Announcements 8 December 2020). The Chairman referred to this earlier ASX lodgement during the meeting.

The final poll results on all resolutions were being finalised by the Company’s register, Link Market Services Limited, following the meeting. Kogi has now announced the voting results.

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

Kogi Response: The Company confirms that it is in compliance with the ASX Listing Rules and in particular Listing Rule 3.1.

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

Kogi Response: The Company's response has been authorised and approved by the Board.

Yours faithfully



Ray Ridge
Company Secretary
Kogi Iron Limited



15 December 2020

Mr Ray Ridge
Company Secretary
Kogi Iron Limited

By email:

Dear Mr Ridge

Kogi Iron Limited ('KFE'): Price and Volume - Query

ASX refers to the following:

- A. The change in the price of KFE's securities from a low of \$0.022, at the close of trade on Monday 14 December 2020 to an intra-day high of \$0.037, today Tuesday 15 December 2020.
- B. The significant increase in the volume of KFE's securities traded today, Tuesday 15 December 2020.

Request for information

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

1. Is KFE 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 KFE relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in KFE's securities would suggest to ASX that such information may have ceased to be confidential and therefore KFE 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 KFE may have for the recent trading in its securities?
4. Please confirm that KFE is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that KFE'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 KFE 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 **2:40 PM AWST Tuesday, 15 December 2020**. 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, KFE'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 KFE 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 KFE’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 KFE’s securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

In responding to this letter, you should have regard to KFE’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 KFE’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

Madeleine Green
Senior Adviser, Listings Compliance (Perth)