

28 April 2014

Mr Dale Allen  
Australian Securities Exchange  
Level 40, Central Park  
152-158 St Georges Terrace  
PERTH WA 6000

By email: [Dale.Allen@asx.com.au](mailto:Dale.Allen@asx.com.au)

Dear Mr Allen

**RESPONSE TO ASX PRICE AND VOLUME QUERY**

In response to your correspondence dated 23 April 2014 regarding an increase in the price of the Company's securities, Eclipse Metals Limited ("Eclipse" or "the Company") advises the following:

1. Following the Company's ASX announcement on 15 April 2014 in relation to the commencement of preliminary geological reconnaissance and surface geochemical exploration programmes over the Mary Valley Manganese and Moonford Iron Projects in Queensland. The announcement has attracted positive interest from local media groups, including the Gympie Times newspaper "*Exciting indications for Mary mining future*" outlining the Company's exploration work over the historic mined areas.

Since the Company's ASX announcement mentioned above on the 15 April 2014, the positive media interest in the public domain and the ASX announcement accompanied with this response today, the Company is not aware of any information that has not been announced which, if known, could be an explanation for recent trading in the securities of the Company.

The Company became aware of the information contained in today's announcement during the long weekend period of 25<sup>th</sup> – 28<sup>th</sup> April 2014.

2. Not applicable.
3. Other than as set out in the ASX announcement to the market submitted earlier today and the ASX announcement to the market on 15 April 2014 concerning the commencement of exploration programmes over the Mary Valley Manganese and Moonford Iron Projects, the Company is not aware of any other explanation for the price change in the securities of the Company.
4. The Company confirms that it is in compliance with the ASX Listing Rules and, in particular, Listing Rule 3.1.



Keith Bowker  
Company Secretary

For further information please contact:

**BOARD**

Carl Popal  
Executive Chairman

Pedro Kastellorizos  
Executive Director

Rodney Dale  
Non-Executive Director

Justin Barton  
Non-Executive Director

**COMPANY SECRETARY**

Keith Bowker

**REGISTERED OFFICE**

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**PRINCIPAL PLACE OF BUSINESS**

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**AUSTRALIAN BUSINESS NUMBER**

85 142 366 541

**SHARE REGISTRY**

Security Transfer Registrars  
770 Canning Highway  
Applecross WA 6153

**ASX CODE**

EPM

**WEBSITE**

[www.eclipsemetals.com.au](http://www.eclipsemetals.com.au)

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23 April 2014

Mr Keith Bowker  
Company Secretary  
Eclipse Metals Limited  
Suite 1/56 Kings Park Road  
West Perth WA 6005

Dear Keith

**Eclipse Metals Limited (the "Entity")**

We have noted a change in the price of the Entity's securities from a close of \$0.004 on 17 April 2014 to an intra-day high of \$0.011 today, 23 April 2014. We have also noted a significant 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.

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### 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 **12:30 pm WST, today, 23 April 2014**. 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 at **dale.allen@asx.com.au** and **tradinghaltspert@asx.com.au** or by facsimile to 08 9221 2020. 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*.

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If you have any queries or concerns about any of the above, please contact me immediately.

Yours sincerely

*[Sent electronically without signature]*

Dale Allen

**Adviser, Listings Compliance (Perth)**