

**Coziron Resources Limited**

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29 July 2019

Elizabeth Harris  
Principal Adviser, Listing Compliance  
ASX Compliance Pty Ltd  
Level 40,  
152-158 St George's Terrace  
PERTH WA 6000

Dear Elizabeth,

**AWARE QUERY**

We refer to your letter dated 26 July 2019 in relation to the above and provide the following responses to your questions:

1. *Does CZR consider that a reasonable person would expect the Information to have a material effect on the price or value of its securities?*

Yes.

2. *If the answer to question 1 is "no", please advise the basis for that view.*

Not applicable.

3. *When did CZR first become aware of the Information? In answering this question, please also state when CZR received the report from the prospector who had recovered the 203 gold nuggets.*

Dr Rob Ramsay, Director, received notification of the prospector's report by email at 3.07pm (WST) on Friday 19 July 2019. The other Board members were first informed at the monthly Board Meeting held at 2pm on Monday 22 July 2019. The draft announcement was first circulated to the Board on Wednesday 24 July 2019 10.57am (WST) following completion of the required diagrams and JORC table.

4. *If CZR first became aware of the Information before the time of the Announcement, did CZR make any disclosure prior to the time of the Announcement which disclosed the Information? If so, please provide details. If not, please explain why the Information was not released to the market at an earlier time, commenting specifically on when you believe CZR was obliged to release the Information under Listing Rules 3.1 and 3.1A and what steps CZR took to ensure that the Information was released promptly and without delay..*

The Company did not make any announcement before 9.12am (EST) 25 July 2019. The Information was not released to the market earlier than that time as:

1. The Company had not been advised of the prospector's activities prior to the receipt of the Information;
  2. The Information was received without notice;
  3. The Company was analysing the report received from the prospector including plotting the locations at which the nuggets were found; and
  4. The Company was preparing the map included in the announcement and completing the JORC table to accompany the results.
5. *Please confirm that CZR is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.*

The Company confirms that it is in compliance with Listing Rule 3.1.

6. *Please confirm that CZR'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 CZR with delegated authority from the board to respond to ASX on disclosure matters.*

The Company's responses to the above questions have been approved by the Board.

Yours sincerely



Stephen Hewitt-Dutton  
Company Secretary



26 July 2019

Mr Stephen Hewitt-Dutton  
Company Secretary  
Coziron Resources Limited

By email: [stephen@tridentcapital.com.au](mailto:stephen@tridentcapital.com.au)

Dear Mr Hewitt-Dutton

**Coziron Resources Limited ('CZR'): Aware Query**

ASX refers to the following:

- A. The change in the price of CZR's securities from a low of \$0.010 to a high of \$0.019 over the five trading days to 26 July 2019.
- B. CZR's announcement entitled "Coziron Directors and Largest Shareholder Invest in the Company" released on the ASX Market Announcements Platform ('MAP') on 22 July 2019 disclosing that, amongst other things, the Directors and the largest shareholder, Yandal Investments Pty Ltd, wholly owned by Mark Creasy, have provided a further A\$685,000 of interim funding to CZR by way of loans that may be converted to shares in CZR (subject to shareholder approval) at \$0.01 per share or the same price as CZR's next capital raising, whichever is the lower price.
- C. CZR's announcement entitled "203 Gold Nuggets from Top Camp Project" released on MAP at 9:12 am (EST) on 25 July 2019 (the 'Announcement'), disclosing that, amongst other things, 203 gold nuggets ranging in weight from 0.04g to 2.14g for a total of 75.3g were recovered by a prospector using a metal detector from the Top Camp and Middle Valley Prospects on the Croydon Project (E47/2150) and that CZR had recently received a detailed report from the prospector who recovered the 203 gold nuggets ('Information').
- D. Listing Rule 3.1, which requires a listed entity to immediately give ASX 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.
- E. The definition of "aware" in Chapter 19 of the Listing Rules, which states that:

*"an entity becomes aware of information if, and as soon as, an officer of the entity (or, in the case of a trust, an officer of the responsible entity) has, or ought reasonably to have, come into possession of the information in the course of the performance of their duties as an officer of that entity" and section 4.4 in Guidance Note 8 Continuous Disclosure: Listing Rules 3.1 – 3.1B "When does an entity become aware of information."*
- F. Listing Rule 3.1A, which sets out exceptions from the requirement to make immediate disclosure, provided that each of the following are satisfied:

**"3.1A** *Listing rule 3.1 does not apply to particular information while each of the following is satisfied in relation to the information:*

**3.1A.1** *One or more of the following applies:*

  - *It would be a breach of a law to disclose the information;*
  - *The information concerns an incomplete proposal or negotiation;*
  - *The information comprises matters of supposition or is insufficiently definite to warrant disclosure;*
  - *The information is generated for the internal management purposes of the entity; or*

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- *The information is a trade secret; and*
- 3.1A.2 *The information is confidential and ASX has not formed the view that the information has ceased to be confidential; and*
- 3.1A.3 *A reasonable person would not expect the information to be disclosed.”*
- G. ASX’s policy position on the concept of “confidentiality”, which is detailed in section 5.8 of Guidance Note 8 *Continuous Disclosure*: Listing Rules 3.1 – 3.1B. In particular, the Guidance Note states that:

*“Whether information has the quality of being confidential is a question of fact, not one of the intention or desire of the listed entity. Accordingly, even though an entity may consider information to be confidential and its disclosure to be a breach of confidence, if it is in fact disclosed by those who know it, then it ceases to be confidential information for the purposes of this rule.”*

### **Request for Information**

Having regard to the above, ASX asks CZR to respond separately to each of the following questions and requests for information:

1. Does CZR consider that a reasonable person would expect the Information to have a material effect on the price or value of its securities?
2. If the answer to question 1 is “no”, please advise the basis for that view.
3. When did CZR first become aware of the Information? In answering this question, please also state when CZR received the report from the prospector who had recovered the 203 gold nuggets.
4. If CZR first became aware of the Information before the time of the Announcement, did CZR make any disclosure prior to the time of the Announcement which disclosed the Information? If so, please provide details. If not, please explain why the Information was not released to the market at an earlier time, commenting specifically on when you believe CZR was obliged to release the Information under Listing Rules 3.1 and 3.1A and what steps CZR took to ensure that the Information was released promptly and without delay.
5. Please confirm that CZR is complying with the Listing Rules and, in particular, Listing Rule 3.1.
6. Please confirm that CZR’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 CZR 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 **9.00 AM AWST Wednesday, 31 July 2019**.

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, CZR’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 CZR to request a trading halt immediately.

If you wish to request a trading halt, you must tell us:

- the reasons for the trading halt;
- how long you want the trading halt to last;

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- 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*.

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 [ListingsCompliancePerth@asx.com.au](mailto: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.

#### **Listing Rules 3.1 and 3.1A**

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

#### **Suspension**

If you are unable to respond to this letter by the time specified above ASX will likely suspend trading in CZR's securities under Listing Rule 17.3.

#### **Enquiries**

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

Yours sincerely

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**Elizabeth Harris**  
Manager, Listings Compliance (Perth)