

22 January 2014

Mr J Newman  
Adviser, Listings Compliance (Perth)  
Australian Securities Exchange  
Level 8, Exchange Plaza  
2 The Esplanade  
PERTH WA 6000

Dear Jeremy,

**POSEIDON NICKEL LIMITED (COMPANY) – ASX PRICE AND VOLUME QUERY**

We refer to your letter dated 22 January 2014 and respond as follows (using your numbering):

1. Yes.

The Company has held discussions with parties about potential off-take and funding arrangements. As contemplated by these ongoing discussions, the Company has recently been reviewing its internal operational plans primarily relating to the recommencement of final refurbishment activities at the Company's Windarra Project.

The Company continues to review various funding options to support its ongoing activities. A number of discussions are under way with potential investors and key stakeholders. These discussions remain ongoing. Currently, the terms of any funding proposal are insufficiently definite to warrant market disclosure.

The Company also notes the publication of several significant reports from global investment banks indicating a strengthening market position for nickel, driven by Indonesia's ban of unprocessed nickel ore. A significant increase in the nickel price may assist the Company's continuing endeavours to raise additional working capital.

2. (a) Yes. Refer to the response to paragraph 1 above.

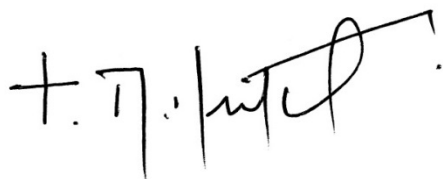
(b) No.

(c) Please refer to the response at paragraph 2(a) above.

3. Not applicable.
4. The Company confirms that it is in compliance with ASX Listing Rules and, in particular, Listing Rule 3.1.

Should you have any further queries, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, appearing to read 'R. Kestel', with a long horizontal stroke extending to the right.

**Ross Kestel**  
**Company Secretary**



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22 January 2014

Mr Ross Kestel  
Company Secretary  
Poseidon Nickel Limited  
Unit 8, Churchill Court  
331-335 Hay Street  
SUBIACO, WA 6008

*By Email: [ross@kestel.com.au](mailto:ross@kestel.com.au)*

Dear Ross

**Poseidon Nickel Limited (the “Company”) - ASX price and volume query**

We have noted a change in the price of the Company’s securities from a closing price of 8.3 cents on Tuesday, 21 January 2014 to an intra-day high of 10.5 cents at the time of writing today. We have also noted an increase in the volume of trading in Company’s securities over this period.

In light of the price and volume change, ASX asks you to respond separately to each of the following questions:

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?
2. If the answer to question 1 is “yes”:
  - a) Is the Company relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1?

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

## 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 no later than **4:30 pm (WST) Wednesday, 22 January 2014**. If we do not have your response by then, ASX will have no choice but to consider suspending trading in the Company'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 Company'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 Jeremy Newman by e-mail at [jeremy.newman@asx.com.au](mailto:jeremy.newman@asx.com.au). It should not be sent directly to the ASX Market Announcements Office. This is to allow us 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 Company 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 Company'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 Company'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]*

Jeremy Newman

**Adviser, Listings Compliance (Perth)**