

Level 3 22 Railway Road Subiaco 6008 Western Australia PO Box 8187 Subiaco East WA 6008 T: +61 8 6146 5325 www.ironbark.gl admin@ironbark.gl

5 October 2021

Barbara Lim Australian Securities Exchange Limited Level 40, Central Park, 152-158 St Georges Terrace PERTH WA 6000

RESPONSE TO ASX PRICE QUERY

Dear Barbara,

In response to your letter dated 5 October 2021, Ironbark Zinc Limited ("**Ironbark**", "**the Company**" or "**IBG**") (ASX:IBG) wishes to address each of your queries regarding the increase in the price of IBG securities on 5 October 2021, as follows:

- 1. No
- 2. Not applicable
- 3. The Company notes that there has been a positive response to the ASX announcement made on 28 September 2021 titled "Alexander Downer AC and Paul Cahill Appointed as Directors"
- 4. The Company confirms that it is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.
- 5. The Company's responses have been authorised and approved under its published continuous disclosure policy and also by an officer with delegated responsibility from the Board to respond to ASX on disclosure matters.

Further Details

This notice is authorised to be issued by the Board.

Please contact Managing Director Mr. Michael Jardine for any further inquiries on either <u>mjardine@ironbark.gl</u> or +61 424 615 047.



5 October 2021 Reference: 40462

Mr Jonathan Whyte Company Secretary Ironbark Zinc Limited

By email: jdw@pel.net.au

Dear Mr Whyte

Ironbark Zinc Limited ('IBG'): Price - Query

ASX refers to the following:

A. The change in the price of IBG's securities from \$0.042 at the close of trade on Monday, 4 October 2021 to an intra-day high of \$0.052 today Tuesday, 5 October 2021.

Request for information

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

- 1. Is IBG 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 IBG relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in IBG's securities would suggest to ASX that such information may have ceased to be confidential and therefore IBG 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 IBG may have for the recent trading in its securities?
- 4. Please confirm that IBG is complying with the Listing Rules and, in particular, Listing Rule 3.1.
- 5. Please confirm that IBG'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 IBG 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 **10:45 AM AWST Tuesday, 5 October 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, IBG'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 IBG 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 IBG'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 IBG's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

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

Barbara Lim Adviser, Listings Compliance (Perth)