



26 April 2016

Mr Ben Secrett  
Senior Adviser  
ASX Listings Compliance  
Level 40, Central Park  
152-158 St George's Terrace  
PERTH WA 6000

By Email: [ben.secrett@asx.com.au](mailto:ben.secrett@asx.com.au)

Dear Mr Secrett,

### **RESPONSE TO PRICE AND VOLUME QUERY**

Further to your letter dated 26 April 2016 in relation to an increase in price from \$0.005 to \$0.01 and an increase in the volume of trading in the Company's securities, our response to your questions is as follows:

1. The Company made an announcement on 11 March 2016 in relation to the commencement of an auger soil geochemical sampling program at its South Laverton project of Sunrise Bore.

The Company has received the assays from the program and the Company's geologists are currently interpreting the results and are preparing an announcement for approval by the Board and release to the market.

The announcement is only for the purpose of updating investors on the progress of that drilling campaign, as initial interpretation shows some gold present but not at elevated levels to make the Company believe they are material to investors.

2. The Company is preparing an announcement for release to the market within the next 2 days. The Company does not believe the results are material to investors and the results are being released for information purposes and would not explain any movement in the share price of the Company.
3. The Company is aware of market speculation regarding potentially encouraging drilling activities on tenements located in proximity to the Company's Leonora projects which could indicate new mineralisation within the regional area of the Company's tenements.

The Company also notes an increase in the price of iron ore from around \$39 per tonne in December 2015 to around \$55-65 per tonne in April 2016. The Company has a large exposure to an upward movement in the iron ore price with the Mt Bevan project, and believes investors may be repurchasing shares in the Company should there be a sustained recovery in iron ore prices.

Local Knowledge | International Network | Quality Assets

Tel: + 61 (8) 9421 2000 Fax: +61 (8) 9421 2001

Email: [info@legacyiron.com.au](mailto:info@legacyiron.com.au) Web [www.legacyiron.com.au](http://www.legacyiron.com.au) ACN 125 010 353

PO Box 5768, St Georges Terrace, Perth, WA, 6831 | Ground Floor, Canute House, 15 Rheola Street, West Perth, WA, 6005

For personal use only

4. The Company confirms it is in compliance with the listing rules and, in particular, Listing Rule 3.1. The Company will make ongoing announcements to the ASX as required to comply with its continuous disclosure obligations.

Should you require any additional information please do not hesitate to contact the Company.

Yours faithfully,

Rakesh Gupta  
Chief Executive Officer



26 April 2016

Ben Donovan  
Legacy Iron Ore Limited  
Ground Floor, Canute House  
15 Rheola Street  
WEST PERTH WA 6005

By email

Dear Mr Donovan

**LEGACY IRON ORE LIMITED (“ENTITY”): ASX PRICE & VOLUME QUERY**

We note a change in the price of the Entity’s securities from a closing price of \$0.005 on Wednesday, 20 April 2016 to an intra-day high of \$0.01 at the time of writing today, Tuesday, 26 April 2016.

We also note an increase in the trading volume of the Entity’s securities today to a level that is significantly above the average trading volume on days when the Entity’s securities are traded.

In light of the price and volume increases, 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?

For personal use only



4. Please confirm that the Entity 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 not later than 1.30pm AWST today, Tuesday, 26 April 2016**. 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 [tradinghaltspert@asx.com.au](mailto:tradinghaltspert@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 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*.

Please contact me immediately if you have any queries or concerns about any of the above.

Yours sincerely

*[sent electronically without signature]*

Ben Secrett  
**Senior Adviser, ASX Listings Compliance**