18 May 2018

Ms Elizabeth Harris
Principal Adviser, Listings Compliance (Perth)
ASX Limited
20 Bridge Street
SYDNEY NSW 2000

By email: Elizabeth.Harris@asx.com.au

Dear Elizabeth,

Re Aware Query

We refer to your letter of 17 May 2018 to Viking Mines Limited (**Company**) and adopting similar paragraph numbering and defined terms as contained therein we respond as follows:

1. The Company became aware of the Relevant Information at approximately 9:00am AEST on Friday, 11 May 2018.

2. No.

3. The Company does not consider the Relevant Information material as the Purchaser is not proposing to withdraw from its payment obligations. The Purchaser has simply requested that the due date for payment be extended to 31 July 2018. The Company wished to advise the market of this request, as the Company had previously announced that the due date for the payment was 31 December 2017, with a grace period provided to 31 January 2018. If and when the Company becomes aware of any material which a reasonable person would expect to have a material effect on the price or value of its securities, the Company would proceed to release that information to the market immediately.

4. N/A.

5. We confirm that the Company is in compliance with the ASX Listing Rules and in particular Listing Rule 3.1.

6. We confirm that this response has been approved by the Board of Directors of the Company.

We trust this answers your queries.

Yours faithfully



Dean Jagger
Company Secretary

17 May 2018

Mr Dean Jagger
Company secretary
Viking Mines Limited
Level 29
201 Elizabeth Street
Sydney NSW 2000

By email: djagger@whittens.com.au

Dear Mr Jagger

Viking Mines Limited ("VKA"): aware query

ASX Limited ("ASX") refers to the following:

A. The change in the price of VKA's securities from a high of $0.036 on Thursday 10 May 2018 to a low of $0.026 on Monday 14 May 2018.

B. VKA's announcement entitled "Sale of Akoase Gold Project Update" ("Announcement") lodged on the ASX Market Announcements Platform and released at 4:51 pm (AEST) on Monday 14 May 2018 ("Relevant Date"), disclosing the delay in the receipt by VKA of USD$3million from Akoase Resources Ltd ("Purchaser") which is part of the consideration for the sale of the Akaose gold project. The Announcement also stated that the Purchaser had requested that the payment date for the USD$3million be extended until 31 July 2018 ("Relevant Information").

C. Listing Rule 3.1, which 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.

D. 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"*.

E. 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*
- *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."

F. 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."*

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

1. When did VKA first become aware of the Relevant Information?
2. Does VKA consider the Relevant Information to be information that a reasonable person would expect to have a material effect on the price or value of its securities?
3. If the answer to question 2 is "no", please advise the basis for that view.
4. If the answer to question 2 is "yes" and VKA first became aware of the Relevant Information before the Relevant Date, did VKA make any announcement prior to the Relevant Date which disclosed the Relevant Information? If so, please provide details. If not, please explain why the Relevant Information was not released to the market at an earlier time, commenting specifically on when you believe VKA was obliged to release the Relevant Information under Listing Rules 3.1 and 3.1A and what steps VKA took to ensure that the Relevant Information was released promptly and without delay.
5. Please confirm that VKA is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.
6. Please confirm that VKA'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 VKA 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, 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 half an hour before the start of trading (ie before 7.30 a.m. WST) on Monday 21 May 2018.

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. It should <u>not</u> 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 VKA'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 VKA's obligation to disclose information under Listing Rule 3.1 is not confined to, nor is it necessarily satisfied by, providing the information requested in this letter.

Further, 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, VKA's obligation is to disclose the information "immediately". This may require the information to be disclosed before the deadline set out in this letter and may require VKA 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;
- 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 will require the request for the 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 do not respond to this letter by the deadline set out above or if ASX does not consider your response to be satisfactory, ASX is likely to suspend trading in VKA's securities under Listing Rule 17.3.

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

Yours sincerely

[Sent electronically without signature]

Elizabeth Harris
Principal Adviser, Listings Compliance (Perth)