

Shannon Nicholson
Listings Adviser, Listings Compliance (Perth)
ASX Compliance Pty Ltd
Level 40, Central Park,
152-158 St George's Terrace
Perth WA 6000
Tel 9224 0000

4 April 2022

By Email: tradinghaltsp Perth@asx.com.au

Dear Shannon,

RESPONSE TO PRICE QUERY

Widgie Nickel Limited ("Widgie" or "the Company") refers to your letter dated 4 April 2022 and comments as follows:

1. The Company is not 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 the securities of the Company.
2. Not applicable.
3. The Company noted in its Chairman's Address – AGM 31 March 2022 released on the ASX announcements platform on 31 March 2022 the following; "To date 16 diamond holes have been drilled for 3,270 metres. The first batch of the assay results are expected to be reported in the next few days which will signal the start of a steady news flow from the awaited assay results and ongoing drill program over the months ahead."

Today's ASX announcement titled "Strong Initial Assay Results at Gillett" is the report of the first batch of assay results as foreshadowed in the Chairman's Address.

4. We confirm that the Company is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.
5. We confirm that the Company's responses have been authorised and approved in accordance with its published continuous disclosure policy or otherwise by its board or an officer of the Company with delegated authority from the board to respond to ASX on disclosure matters.

Yours faithfully,

Graeme Scott

Company Secretary

Widgie Nickel Limited



4 April 2022

Mr Graeme Scott
Company Secretary
Widgie Nickel Limited

By email

Dear Mr Scott

Widgie Nickel Limited ('WIN'): Price - Query

ASX refers to the following:

- A. The change in the price of WIN's securities from a low of \$0.455 at close of trade on 29 March 2022 to an intra-day high of \$0.67 at the time of writing, today.

Request for information

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

1. Is WIN 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 WIN relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in WIN's securities would suggest to ASX that such information may have ceased to be confidential and therefore WIN 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 WIN may have for the recent trading in its securities?
4. Please confirm that WIN is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that WIN'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 WIN 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 **11.30 AM AWST Monday, 4 April 2022**. 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, WIN'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 WIN 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 WIN'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 WIN's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

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

Shannon Nicholson
Principal Adviser, Listings Compliance (Perth)