

**first graphene**

The world's leading graphene company

1 Sepia Close  
Henderson WA 6166

T: +61 1300 660 448 (Australia)  
F: +61 1300 855 044 (Australia)  
E: info@firstgraphene.net

ABN: 50 007 870 760  
ACN: 007 870 760

[firstgraphene.net](http://firstgraphene.net)

14 January 2025

Mr Sam Dorland  
Adviser, Listings Compliance (Perth)  
ASX Compliance Pty Ltd  
Level 40, Central Park,  
152-158 St Georges Terrace  
Perth WA 6000

By Email Only

Dear Sam

**Price Query: First Graphene Limited ("FGR")**

We refer to your letter of 14 January 2025 and respond as follows:

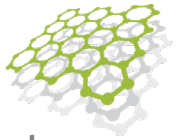
1. FGR is not aware of any information, which has not been announced to the market, which would explain the price movement;
3. We note that FGR is listed in Frankfurt and there has been strong buying activity in the last couple of weeks. It is probable that buying in Germany is on the basis of a flow of announcements dating back into late 2024 whereby FGR announced visibility of its commercial pipeline, its onboarding of global distributors, and its pending final industrial scale trial with Breedon Group in the UK to manufacture Graphene enhanced cement;

First Graphene Ltd is the world's leading graphene company and has built the world's largest graphene production facility in Henderson W.A. The Company also continues to build strong relationships with customers and graphene research institutes, both in Australia and overseas. Customer interaction covers the areas of composites for swimming pools and marine use, thermoplastic polyurethane (TPU) and host cast polyurethane for use in protective personal equipment (PPE) and mining industry, fire retardant coatings and energy storage materials.

With registrations with at the Australian Industrial Chemicals Introduction Scheme (AICIS; Australia) & Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH; UK & Europe) FGR is the only company in the world registered to sell graphene in both jurisdictions. FGR also maintains an active membership of the ISO Technical

For personal use only





**first** graphene

The world's leading graphene company

Committee on Graphene Characterisation Standards. FGR has a robust manufacturing platform and supply chain, from mine to finished product;

Independent research reports have recommended FGR as an undervalued stock with considerable upside potential;

The Directors of First Graphene Ltd are of the opinion the equity markets are appreciating the value provided by FGR as an investment, hence the recent price and volume movement;

4. We confirm FGR continues to be in compliance with its obligations under the Listing Rules, and in particular Listing Rule 3.1; and
5. These responses have been authorised by an officer of FGR delegated with authority from the board to respond to ASX disclosure matters.

**Yours sincerely**

**Michael Bell**  
**Chief Executive Officer**

For personal use only



14 January 2025

Reference: 105171

Ms Elizabeth Lee  
Company Secretary  
First Graphene Limited

By email

Dear Ms Lee

**First Graphene Limited ('FGR'): Price - Query**

ASX refers to the following:

- A. The change in the price of FGR's securities from a low of \$0.035 on 9 January 2024 to a high of \$0.067 today.
- B. The significant increase in the volume of FGR's securities traded from 9 January 2025 to 14 January 2025.

**Request for information**

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

1. Is FGR 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 FGR relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in FGR's securities would suggest to ASX that such information may have ceased to be confidential and therefore FGR 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 FGR may have for the recent trading in its securities?
4. Please confirm that FGR is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that FGR'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 FGR 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 **10:00 AM AWST Tuesday, 14 January 2025**. 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

For personal use only

---

within the exceptions mentioned in Listing Rule 3.1A, FGR'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 FGR 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 FGR'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 FGR's securities under Listing Rule 17.3.

### **Listing Rules 3.1 and 3.1A**

In responding to this letter, you should have regard to FGR'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 FGR'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**

ASX reserves the right to release all or any part of this letter, your reply and any other related correspondence between us to the market under Listing Rule 18.7A.

Regards

---

ASX Compliance