

25 February 2025

Company Announcements Office  
ASX Limited  
Level 4, Exchange Centre  
20 Bridge Street  
SYDNEY NSW 2000

**By Electronic Lodgement:** [ben.dawson@asx.com.au](mailto:ben.dawson@asx.com.au)

Dear Ben

**Reach Resources Limited ('RR1'): ASX Aware Letter**

Reach Resources Limited (ASX: RR1) ('the Company') refers your letter dated 21 February 2025, with regard to the following further queries in respect of the initial assay results from the Company's Murchison South Gold Project released to the ASX on 17 February 2025.

Having regard to your letter, please refer below to the Company's responses to each of the following questions:

**Response to Request for Information**

- 1. Does RR1 consider the initial assay results from the first two drill holes on RR1's Murchison South Gold Project, or any part thereof, to be information that a reasonable person would expect to have a material effect on the price or value of its securities?**

Yes, the Company considers that the initial assay results from the first two drill holes on RR1's Murchison South Gold Project in isolation from the results of the remaining 12 drill holes, to be information that a reasonable person would expect to have a material effect on the price or value of its securities.

- 2. If the answer to any part of question 1 is 'no', please advise the basis for that view. In answering this question, please address the material price change following the release of the Announcement?**

Not applicable.

- 3. When did RR1 first become of the information referred to in question 1 above? In answering this question, please specify the date and time RR1 first became aware of the information?**

The first batch of assay results (being the first two holes) were returned from the laboratory to the exploration manager on 6 February 2025. The results were immediately sent to the database manager for entry into the RR1 database before being sent to the exploration manager. The exploration manager commenced his initial review of the results during the week commencing 10 February 2025 for the purpose for QA/QC, and to put the results into Micromine so that they could be reviewed in the context of the development model and previous results. The CEO received the raw data results and interim analysis from the exploration manager on 12 February 2025 and expected the remaining the results to be received in the immediate days proceeding. The remaining batches are now expected to be returned during the week commencing 24 February 2025.

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4. **If RR1 first became aware of the information referred to in question 1 before the date of the Announcement, did RR1 make any announcement prior to that date which disclosed the information? If not, please explain why the information was not released to the market at an earlier time, commenting specifically on when you believe RR1 was obliged to release the information under Listing Rules 3.1 and 3.1A and what steps RR1 took to ensure that the information was released promptly and without delay?**

**Please provide details of the prior announcement if applicable.**

As noted in the response to questions 1 and 3 above, the Company received the initial assay results from the laboratory on 6 February 2025 and did not disclose the results of the first two holes of RC drilling at the Muchison South Gold Project until 17 February 2025.

On receiving the initial assay results and initial analysis from 25PFC001 (hole 1) and 25PFC002 (hole 2) from the exploration manager on 12 February 2025, the Company formed the view that due to the fact that the first two holes were from a program of 14 holes that was designed to verify a development model and previous drill results against a background of results in an area well known for its inconsistent 'nuggetty' nature of mineralisation, the announcement of the initial two results would have the potential to mislead investors as to the significance of the results, which would place the Company in breach of Clause 19 of the JORC Code 2012 Edition (JORC Code) which states that the:

*"reporting of selected information such as isolated assays, isolated drill holes, assays of panned concentrates or supergene enrich soils or surface samples, without placing them in perspective is unacceptable."*

In addition, due to the relatively small number of samples under analysis, the Company reasonably expected to receive the remainder of the results in a timely fashion post receipt of the initial two holes and hence could announce the full set of results at one time.

Therefore, the Company relied on Listing Rule 3.1A in this regard and determined that until all of the results were received and interpreted, within the context of its objective to provide verification against historical drilling, that in itself depends on the results of all 14 holes, the results from 2 individual holes were insufficiently definite to warrant disclosure to the market.

5. **Please confirm that the Company is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.**

The Company confirms it is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.

6. **Please confirm that the Company'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 the Company with delegated authority from the board to respond to ASX on disclosure matters.**

The Company confirms that the responses provided in this letter have been authorised and approved by the Board.

Yours faithfully

**Reach Resources Limited**

**Chris Achurch**

**Company Secretary**

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21 February 2025

Reference: 106448

Mr Chris Achurch  
Company Secretary  
Reach Resources Limited

By email: [chris@westarcapital.com.au](mailto:chris@westarcapital.com.au)

Dear Mr Achurch

**Reach Resources Limited ('RR1'): ASX Aware Letter**

ASX refers to the following:

- A. The change in the price of RR1's securities from \$0.006 at the commencement of trading on Thursday, 6 February 2025, to an intraday high of \$0.015 on 17 February 2025.
- B. The pause in trade announcement released to the ASX Market Announcements Platform ('MAP') at 8.11 AM AWST on 17 February 2025.
- C. RR1's request for a trading halt pending the response to an ASX Price Query and the release of an announcement regarding initial assay results from the Company's Murchison South Gold Project released on MAP at 8.36 AM AWST on 17 February 2025.
- D. RR1's announcement titled '41m at 2.01g/t Au from Surface-Murchison South Gold Project' (the 'Announcement') released on MAP at 6.21 AM AWST on 19 February 2025 which disclosed, among other things, assay results from the first two drill holes on RR1's Murchison South Gold Project.
- E. RR1's response to ASX's Price Query Letter released on the MAP at 6.21 AM AWST on 19 February 2025 disclosing (ASX queries in bold):

***"...Is the Company 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?"***

*Yes, the Company is aware of 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.*

*The Company notes that as announced on 8 January 2025, the Company commenced RC drilling at the Company's 100%-owned Murchison South Gold Project (formerly the Primrose Gold Project) the purpose of which was to confirm and validate previous results for development planning. As detailed in the announcement dated 8 January 2025, and also the prior announcement dated 11 December 2024, the RC programme was proposed to consist of 12 holes, with the majority between 60-80m in depth. The Company confirmed that results of the RC programme would be released to the market once available. Ultimately, the entire program consisted of 14 drill holes.*

*The Company was intending to release an announcement in respect of the results of the drilling programme next week, once all the results had been received and interpreted.*

...

***Please advise whether the Company is expecting any results from the laboratory in relation to its drilling programme and if yes, please advise when the results are expected to be provided to the Company. Please provide detailed information in relation to the timing of these results.***

Yes, one batch of results from the RC drilling programme (being the first two holes) was returned from the laboratory on 6 February 2025, and the remaining batches are now expected to be returned during the week commencing 24 February 2025.”

- F. The change in the price of RR1’s securities from \$0.014 immediately prior to the release of the Announcement to an intraday high of \$0.018 following the release of the Announcement.
- G. Listing Rule 3.1, which requires a listed entity to immediately give ASX 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.
- H. 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.”*

- I. Section 4.4 in *Guidance Note 8 Continuous Disclosure: Listing Rules 3.1 – 3.1B* titled “When does an entity become aware of information?”
- J. Listing Rule 3.1A, which sets out exceptions from the requirement to make immediate disclosure as follows.

*“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 5 situations 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.”*

- K. The concept of “confidentiality” 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 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 is no longer a secret and it ceases to be confidential information for the purposes of this rule.”*

### **Request for information**

Having regard to the above, ASX asks RR1 to respond separately to each of the following questions:

1. Does RR1 consider the initial assay results from the first two drill holes on RR1’s Murchison South Gold Project, or any part thereof, to be information that a reasonable person would expect to have a material effect on the price or value of its securities?

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2. If the answer to any part of question 1 is 'no', please advise the basis for that view. In answering this question, please address the material price change following the release of the Announcement.
3. When did RR1 first become of the information referred to in question 1 above? In answering this question, please specify the date and time RR1 first became aware of the information.
4. If RR1 first became aware of the information referred to in question 1 before the date of the Announcement, did RR1 make any announcement prior to that date which disclosed the information? If not, please explain why the information was not released to the market at an earlier time, commenting specifically on when you believe RR1 was obliged to release the information under Listing Rules 3.1 and 3.1A and what steps RR1 took to ensure that the information was released promptly and without delay.
- Please provide details of the prior announcement if applicable.
5. Please confirm that RR1 is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.
6. Please confirm that RR1'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 RR1 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 **1.00 PM AWST Wednesday, 26 February 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 within the exceptions mentioned in Listing Rule 3.1A, RR1's obligation is to disclose the information 'immediately'. This may require the information to be disclosed before the deadline set out above and may require RR1 to request a trading halt immediately if trading in RR1's securities is not already halted or suspended.

Your response should be sent by e-mail to **ListingsCompliancePerth@asx.com.au**. It should not be sent directly to the ASX Market Announcements Office. This is to allow us 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.

#### **Suspension**

If you are unable to respond to this letter by the time specified above, ASX will likely suspend trading in RR1's securities under Listing Rule 17.3.

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

In responding to this letter, you should have regard to RR1'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 RR1'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 all or any part of this letter, your reply and any other related correspondence between us to the market under listing rule 18.7A. The usual course is for the correspondence to be released to the market.

Yours sincerely

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ASX Compliance

