



15 May 2025

Lewis Flynn
ASX Limited
Level 40, 152 – 158 St Georges Terrace
PERTH WA 6000

By email: ListingsCompliancePerth@asx.com.au

Attention: Lewis Flynn, Adviser, Listings Compliance (Perth)

Dear Lewis,

Heavy Minerals Limited (“HVY”): Response to ASX Price Query

We refer to your letter dated 15 May 2025 and as requested, we set out below the Company’s response to your queries (using the numbering and lettering in your letter) as follows:

1. HVY is not aware of any information concerning the Company that has not been announced to the market.
2. N/A.
3. HVY is aware that the Company was mentioned by Next Investor in an article today which is likely to have positively impacted the share price. The article referred to the expected release of the Company’s Port Gregory PFS (Pre-Feasibility Study) Late in May / Early June. The article also mentioned that the Company is raising capital via its Tranche 2 Royalty after successful completion of its Tranche 1 Royalty in 2024.
4. The Company confirms that it is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. The Company confirms that the responses have been approved by the Board of Directors of HVY.

Should you have any queries regarding the above I look forward to discussing these with you.

Kind Regards,

Adam Schofield
Chairman



15 May 2025

Reference: ODIN109283

Mr Stephen Brockhurst
Company Secretary
Heavy Minerals Limited

By email: steve@miningcorporate.com.au

Dear Mr Brockhurst

Heavy Minerals Limited ('HVY'): Price - Query

ASX refers to the following:

- A. The change in the price of HVY's securities from a low of \$0.20 at close of trading on 13 May 2025 to an intra-day high of \$0.275 today.
- B. The significant increase in the volume of HVY's securities traded since 13 May 2025.

Request for information

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

1. Is HVY 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 HVY relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in HVY's securities would suggest to ASX that such information may have ceased to be confidential and therefore HVY 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 HVY may have for the recent trading in its securities?
4. Please confirm that HVY is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that HVY'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 HVY 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 **4:00 PM AWST Thursday, 15 May 2025**. You should note that if the information

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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, HVY'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 HVY 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 HVY'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 HVY's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

In responding to this letter, you should have regard to HVY'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 HVY'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.

Yours sincerely

ASX Compliance