



13 January 2022

Ms Yushra Haniff  
Compliance Adviser, Listing Compliance (Sydney)  
ASX Limited  
Exchange Centre  
20 Bridge Street  
Sydney NSW 2000

**By email:** [ListingsComplianceSydney@asx.com.au](mailto:ListingsComplianceSydney@asx.com.au)

Dear Ms Haniff

**Bastion Minerals Limited (“BMO”): Price Query**

I refer to your letter of today’s date, sent by email to BMO’s Company Secretary, Mr. Philip Mackey, received at 12:54PM.

In response to the Request for Information by the ASX, BMO advises as follows:

1. *Is BMO 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?*

Response: No

2. *If the answer to question 1 is “no”, is there any other explanation that BMO may have for the recent trading in its securities?*

Response: BMO is aware of recent trading in the Company’s shares, but it does not know the identity of the buyers and sellers that has caused a change in the price of BMO’s securities from a close of \$0.205 on 11 January 2022 to a low of \$0.14 today at the time of receipt of your letter. I note that the stock has since moved back towards its last close, at \$0.18 at 1:38PM.

3. *Please confirm that BMO is complying with the Listing Rules and, in particular, Listing Rule 3.1.*

Response: BMO is compliant with the Listing Rules and, in particular, Listing Rule 3.1.

4. *Please confirm that BMO’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 BMO with delegated authority from the board to respond to ASX on disclosure matters.*

Response: BMO’s responses to the questions above have been authorised and approved under its published continuous disclosure policy and by me, as Executive Chairman, on behalf of the Board.

Yours sincerely,

**Ross Landles**  
Executive Chairman



13 January 2022

Reference: 45179

Mr Philip John Mackey  
Company Secretary  
Bastion Minerals Ltd  
Level 6 22 Pitt Street Sydney NSW AU 2000

By email: [mackey@companymatters.com.au](mailto:mackey@companymatters.com.au)

Dear Mr Mackey

### **Bastion Minerals Limited ('BMO'): Price - Query**

ASX refers to the following:

- A. The change in the price of BMO's securities from a close of \$0.205 on 11 January 2022 to a low of \$0.14 today at the time of writing.
- B. The significant increase in the volume of BMO's securities of about 2 million shares traded so far today.

### **Request for information**

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

1. Is BMO 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 BMO relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in BMO's securities would suggest to ASX that such information may have ceased to be confidential and therefore BMO 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 BMO may have for the recent trading in its securities?
4. Please confirm that BMO is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that BMO'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 BMO 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 **3:00 PM AEDT Thursday, 13 January 2022**. 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, BMO'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 BMO to request a trading halt immediately.

Your response should be sent to me by e-mail at [ListingsComplianceSydney@asx.com.au](mailto:ListingsComplianceSydney@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 BMO'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 BMO's securities under Listing Rule 17.3.

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

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

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Kind regards

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**Yushra Haniff**  
Compliance Adviser, Listings Compliance (Sydney)