

9 February 2022

Adriarne Gatty Senior Adviser, Listings Compliance (Sydney) ASX Compliance Pty Ltd 20 Bridge Street Sydney NSW 2000

By email.

Dear Adriarne,

ABx Group Limited (ABX): Price and Volume - Query

With respect to ASX Query Letter dated 8 February 2022, the Company responds seriatim as follows:

1. Is ABX 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.

- 2. If the answer to question 1 is "yes".
 - (a) Is ABX relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in ABX's securities would suggest to ASX that such information may have ceased to be confidential and therefore ABX 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.

No.

(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. ASX notes that ABX is currently in a trading halt.

No.

(c) If an announcement cannot be made immediately, why not and when is it expected that an announcement will be made?

The Company is preparing a release relating to results from drilling at the REE Project in Tasmania. The market was advised that results were pending in the Company's most recent Quarterly Activities Statement (ASX 28/1/2022).

Assay processing has been slow due to general market demands, and results were received on Friday, 4 February.

An announcement is being prepared to comply with JORC requirements. The announcement includes detailed maps and supporting information.

The announcement is expected to be released pre-open on Thursday 10 February 2022.

ABx Group Limited ACN 139 494 885



3. If the answer to question 1 is "no", is there any other explanation that ABX may have for the recent trading in its securities?

Additionally, the Company informed the market, "(the Company) is seeking to employ a graduate engineer and a geologist." To further this search, the Company sent a general email seeking to fill the role of Graduate Chemical Engineer at 1:39pm on 8/2/2022.

Seeing a rise in stock price and volume following the email, it was thought that the price and volume change may have been in response to the emailer. It was not considered sufficiently material advise the market of this email.

However, being aware of the REE Results announcement being prepared, for the avoidance of doubt and the abundance of caution and following consultation with the ASX, the Company requested a trading halt.

4. Please confirm that ABX is complying with the Listing Rules and, in particular, Listing Rule 3.1.

Yes.

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

Yes.

Please contact Henry Kinstlinger if you wish to discuss any of the above responses.

Yours sincerely,

Henry Kinstlinger Company Secretary



8 February 2022

Reference: 46627

Mr Henry Kinstlinger Company Secretary ABX Group Limited Level 5 52 Phillip Street Sydney NSW 2000

By email

Dear Mr Kinstlinger

ABX Group Limited ('ABX'): Price - Query

ASX refers to the following:

- A. The change in the price of ABX's securities from a low of \$0.10 on 7 February 2022 to a high of \$0.115 today, 8 February 2022
- B. The significant increase in the volume of ABX's securities traded today, 8 February 2022.

Request for information

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

- 1. Is ABX 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 ABX relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in ABX's securities would suggest to ASX that such information may have ceased to be confidential and therefore ABX 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. ASX notes that ABX is currently in a trading halt.
 - (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 ABX may have for the recent trading in its securities?
- 4. Please confirm that ABX is complying with the Listing Rules and, in particular, Listing Rule 3.1.
- 5. Please confirm that ABX'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 ABX 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 AEDT Wednesday, 9 February 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, ABX'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 ABX to request a trading halt immediately.

Your response should be sent to me by e-mail at **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.

Listing Rules 3.1 and 3.1A

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

Adriarne Gatty

Senior Adviser, Listings Compliance (Sydney)