



31 March 2025

ASX Compliance Pty Limited  
Exchange Centre, 20 Bridge Street  
Sydney, NSW, 2000  
By email: [ListingsComplianceSydney@asx.com.au](mailto:ListingsComplianceSydney@asx.com.au)

We refer to the ASX's letter dated 31 March 2025 in respect of the change in the price Legacy Mineral Holdings Limited (ASX: LGM) ("Legacy" or "the Company") ordinary fully paid shares ("Shares") from a low of \$0.21 to a high of \$0.24 today and the significant increase in volume of the Shares traded on 28 March 2025 and 31 March 2025.

We answer your queries as follows:

1. No. The Company is not aware of any information concerning it that has not been announced to the market which, if known by some of the market, could explain the recent trading in its Shares.
2. Not applicable.
3. Other reasons that the Company has for the recent trading in its Shares are:
  - (a) As the Company announced on 25 March 2025 to the market, the Company is undertaking a Pre-Feasibility Study at Drake with results expected by 11 April 2025; and
  - (b) As the Company announced on 26 March 2025 to the market:
    - i. the Company has received unverified drilling assays for the Bauloora and Thomson Projects, and partial drilling assays for the Drake Project;
    - ii. the Thomson drilling assays are expected to be reported on or about 3 April 2025 and the Bauloora drilling assays on or about 10 April 2025, after they have been verified;
    - iii. the Drake Project drilling assays are expected to be reported on or about 28 April 2025; and
    - iv. The Company reasonably believes that the unverified drilling results have remained confidential to the Company, and its outside consultants and contractors; and
  - (c) The Company is aware of two new research reports recently published:
    - i. East Coast Research published a report dated 31 March 2025 on the Company and Crimson Carp published a report dated 30 March 2025 referring to the Company's recent Thomson Project drilling ("Reports"); and
    - ii. the publishers of the Reports used publicly available information.

The Company is otherwise unaware of any explanation for the recent trading in its Shares, other than information advised above.

4. The Company is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. This response to the ASX has been authorised for release by the Company's Managing Director and Chief Executive Officer and Company Secretary and Chief Financial Officer, with delegated authority from the board to respond to ASX on disclosure matters.

Yours sincerely,

Ian Morgan

Company Secretary and Chief Financial Officer



31 March 2025

Reference: 107742

Mr Ian Morgan  
Company Secretary  
Legacy Minerals Holdings Limited  
c/ Benbow & Pike  
Suite 401, 54 Miller Street  
North Sydney NSW 2060  
Australia

By email only.

Dear Mr Morgan

**Legacy Minerals Holdings Limited ('LGM'): Price and Volume Query**

ASX refers to the following:

- A. The change in the price of LGM's securities from a low of \$0.21 to a high of \$0.24 today.
- B. The significant increase in the volume of LGM's securities traded from 28 March 2025 to 31 March 2025.

**Request for information**

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

- 1. Is LGM 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 LGM relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in LGM's securities would suggest to ASX that such information may have ceased to be confidential and therefore LGM 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 LGM may have for the recent trading in its securities?
- 4. Please confirm that LGM is complying with the Listing Rules and, in particular, Listing Rule 3.1.
- 5. Please confirm that LGM'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 LGM with delegated authority from the board to respond to ASX on disclosure matters.

**When and where to send your response**

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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 **2.15 PM AEDT Monday, 31 March 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, LGM'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 LGM 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.

### 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 LGM'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 LGM's securities under Listing Rule 17.3.

### Listing Rules 3.1 and 3.1A

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

Kind regards

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ASX Compliance