

28 October 2020

Dale Allen
Principal Adviser, ASX Listings Compliance – Perth
Level 40, Central Park
152-158 St Georges Terrace
PERTH WA 6000

By email: ListingsCompliancePerth@asx.com.au

Dear Mr Allen,

Firefly Resources Limited (ASX: FFR) - Response to ASX Price and Volume Query

We refer to your letter dated 28 October 2020 regarding an ASX price and volume query and respond to your questions as follows:

- 1. Is FFR 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?**

The Company is not aware of any information concerning it that has not been announced to the market which, if known, could explain the recent trading in the securities of the Company.

- 2. Not Applicable**
- 3. If the answer to question 1 is “no”, is there any other explanation that FFR may have for the recent trading in its securities?**

As set out in the ASX announcement on 28 September 2020, the Company has undertaken a second phase, 10,000m RC drill program at the Yalgoo Gold Project. The Company advises that it is currently awaiting assay results from this drill program and upon receipt and analysis of assay results which is anticipated to be completed in mid-November 2020 Firefly will announce these exploration results.

The Company also notes the recently completed private placement as set out in the ASX announcement on 1 October 2020, which was strongly supported by existing shareholders and also resulted in the introduction of new investors, and provided the working capital to expand and accelerate the Company’s ongoing drilling and exploration programs at the Yalgoo Gold Project.

- 4. Please confirm that FFR is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.**

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



- 5. Please confirm that FFR'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 FFR with delegated authority from the board to respond to ASX on disclosure matters.**

The Company confirms that its responses to the questions above have been authorised and approved by an officer of the Company with delegated authority from the board to respond to the ASX on disclosure matters.

Yours sincerely

Steven Wood
Joint Company Secretary

28 October 2020

Reference: 26781

Ms Natalie Teo & Mr Steven Wood
Joint Company Secretary
Firefly Resources Limited

By email: natalie.teo@anthonyho.com.au & sw@grangeconsulting.com.au

Dear Ms Teo & Mr Wood

Firefly Resources Limited ('FFR'): Price - Query

ASX refers to the following:

- A. The change in the price of FFR's securities from a low of \$0.185 to a high of \$0.25 today, 28 October 2020.
- B. The significant increase in the volume of FFR's securities traded today, 28 October 2020.

Request for information

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

1. Is FFR 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 FFR relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in FFR's securities would suggest to ASX that such information may have ceased to be confidential and therefore FFR 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 FFR may have for the recent trading in its securities?
4. Please confirm that FFR is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that FFR'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 FFR 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 Wednesday, 28 October 2020**. 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, FFR'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 FFR 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 FFR'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 FFR's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

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

Dale Allen

Principal Adviser, Listings Compliance (Perth)