

27 September 2021

Madeleine Green Adviser, Listings Compliance (Perth) ASX Limited Level 40, Central Park 152-158 St Georges Terrace Perth WA 6000

Via E-mail ListingsCompliancePerth@asx.com.au

We refer to your letter of today's date and Revolver Resources Holdings Ltd ("RRR") responds to each of the queries in your letter as follows:

1) Is RRR 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?

Nc

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

N/A

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

The Company refers to an interview conducted by the Company's Managing Director, Mr Pat Williams, with Ausbiz on 23 September 2021 (Interview). The Company cannot be certain whether Mr Williams' statements during that interview have contributed to the recent trading of securities or not. In the context of what was a much longer Interview, Mr Williams made a brief reference to the potential value of in-ground metal for the Dianne Project. This statement was not a reference to the Mineral Resource estimate nor to the economic value of any resources in any manner whatsoever. There is the possibility however that this statement may have caused some confusion or may have prompted speculation, however unfounded. The Company is yet to report a Mineral Resource estimate for the Project in accordance with the Australasian Code for Reporting of Exploration Results, Mineral Resources and Ore Reserves ('the JORC Code') (2012 edition). Therefore, at this stage the Company does not have a reasonable basis to disclose any forward-looking statements and the forward-looking statements have been retracted.

Investors should not rely on the retracted information as a basis for their investment decisions.

# **Revolver Resources Holdings Ltd**



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

RRR Confirms that it is complying with the ASX Listing 3.1.

5) Please confirm that RRR'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 RRR with delegated authority from the board to respond to ASX on disclosure

RRR confirms that the response to the above questions have been authorised and approved by the Board of RRR.

James Bahen Company Secretary **Revolver Resources Holdings Ltd** 



27 September 2021

Mr James Bahen Company Secretary Revolver Resources Holdings Ltd

By email: james@smallcapcorporate.com.au

Dear Mr Bahen

#### Revolver Resources Holdings Ltd ('RRR'): Price Query

ASX refers to the following:

- A. The change in the price of RRR's securities from a low of \$0.31 at the close of trade on Friday 24 September 2021 to an intra-day high of \$0.63 today, Monday 27 September 2021.
- B. The significant increase in the volume of RRR's securities traded today, Monday 27 September 2021.

#### Request for information

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

- 1. Is RRR 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 RRR relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in RRR's securities would suggest to ASX that such information may have ceased to be confidential and therefore RRR 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 RRR may have for the recent trading in its securities?
- 4. Please confirm that RRR is complying with the Listing Rules and, in particular, Listing Rule 3.1.
- 5. Please confirm that RRR'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 RRR 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 **5:00 PM AWST Monday**, **27 September 2021**. 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, RRR'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 RRR 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 RRR'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 RRR's securities under Listing Rule 17.3.

## Listing Rules 3.1 and 3.1A

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

#### **Madeleine Green**

Principal Adviser, Listings Compliance (Perth)