



13 January 2022

Vanessa Nevjestic
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Email: vanessa.nevjestic@asx.com.au

Dear Vanessa,

Response to ASX Price Query – Tombador Iron Limited (ASX: T11)

We refer to your letter dated 13 January 2022 wherein the ASX notes an increase in share price of Tombador Iron Limited (ASX: T11) (**Company**) securities between close of trade on 11 January to intra-day trading on 13 January 2022, in addition to an increase in traded volume of securities from 12 January to 13 January 2022.

The Company provides the following responses to the ASX's queries:

ASX Question 1: Is T11 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?

No, the Company is not aware of any information concerning it that has not been announced to the market which, if known, could explain recent trading in the Company's securities.

ASX Question 2: If the answer to question 1 is "yes".

(a) Is T11 relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in T11's securities would suggest to ASX that such information may have ceased to be confidential and therefore T11 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?

The Company's response to ASX Question 1 is "No" and therefore ASX Question 2 is Not Applicable.



ASX Question 3: If the answer to question 1 is “no”, is there any other explanation that T11 may have for the recent trading in its securities?

The Company is not aware of any reason or information which could be an explanation for the manner of trading in the Company's securities over the aforementioned period.

However, the Company notes it is a high-grade iron ore producer, and the iron ore price has rallied strongly in recent days. The Company's share price is still trading well below the highs of 2021.

Additionally, in recent days, there has been significant rainfall in certain areas of Brazil, impeding the production of several larger mines and a rally by customers to secure iron ore supply. The Company's project is not in an area affected by this weather, and therefore the Company's operations are not affected.

The Company also released an update to the Mineral Resource Estimate (MRE) on 24 December 2021, which may have generated new interest in the Company.

ASX Question 4: Please confirm that T11 is complying with the Listing Rules and, in particular, Listing Rule 3.1.

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

ASX Question 5: Please confirm that T11'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 T11 with delegated authority from the board to respond to ASX on disclosure matters.

The Company also confirms that the above responses have been authorised and approved under the Company's continuous disclosure policy and by its Board.

Authorised for release by the board.

Yours sincerely,

Abby Macnish Niven
CFO & Company Secretary

T: +61 8 6382 1805
E: info@tombadoriron.com



13 January 2022

Reference: ODIN45174

Ms Abby Macnish Niven
Company Secretary
Tombador Iron Limited
1/45 Stirling Highway
Nedlands, Western Australia 6009

By email: admin@tombadoriron.com

Dear Ms Macnish Niven

Tombador Iron Limited ('TI1'): Price and Volume - Query

ASX refers to the following:

- A. The change in the price of TI1's securities from a low of A\$0.035 at the close of trade on Tuesday, 11 January 2022 to an intraday high of A\$0.055 at the time of writing this letter today.
- B. The significant increase in the volume of TI1's securities traded from Wednesday, 12 January 2022 to Thursday, 13 January 2022.

Request for information

In light of this, ASX asks TI1 to respond separately to each of the following questions and requests for information:

1. Is TI1 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 TI1 relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in TI1's securities would suggest to ASX that such information may have ceased to be confidential and therefore TI1 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 TI1 may have for the recent trading in its securities?
4. Please confirm that TI1 is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that TI1'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 TI1 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 **9:45 AM AWST Thursday, 13 January 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, T11'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 T11 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 T11'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 T11's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

In responding to this letter, you should have regard to T11'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 T11'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

Vanessa Nevjestic
Adviser, Listings Compliance (Perth)