

6 June 2022

Stephanie Patchell
Senior Adviser, Listing Compliance (Perth)
Australian Stock Exchange Limited
Level 40, Central Park
152-158 St George's Terrace
PERTH WA 6000



Athena
Resources

ACN 113 758 900

Dear Stephanie,

RESPONSE TO ASX PRICE/VOLUME QUERY

Athena Resources Limited (ASX: AHN) refers to your letter dated 6 June 2022 regarding an ASX Price and Volume Query and respond to your questions as follows:

1. Is AHN 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?

Answer: No

2. If the answer to question 1 is "yes".

- (a) Is AHN relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in AHN's securities would suggest to ASX that such information may have ceased to be confidential and therefore AHN may no longer be able to rely on Listing Rule 3.1A. Accordingly, if the answer to the question is "yes", you need to contact us immediately to discuss the situation

Answer: N/A

- (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)

Answer: N/A

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

Answer: N/A

Athena Resources Limited



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

Answer: The Company announced Changes to the Board of Directors on 31 May 2022 and commencement of resources drilling at the Byro Project on 25 May 2022

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

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

5. Please confirm that AHN’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 AHN with delegated authority from the board to respond to ASX on disclosure matters

Answer: 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 faithfully,

Joe Graziano
Company Secretary

Athena Resources Limited



6 June 2022

Reference: 53627

Mr Joe Graziano
Company Secretary
Athena Resources Limited

By email: joe@pathwayscorporate.com.au

Dear Mr Graziano

Athena Resources Limited ('AHN'): Price and Volume Query

ASX refers to the following:

- A. The change in the price of AHN's securities from a low of \$0.007 to an intraday high of \$0.011 at the time of writing this letter today, Monday 6 June 2022.
- B. The significant increase in the volume of AHN's securities traded today.

Request for information

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

- 1. Is AHN 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 AHN relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in AHN's securities would suggest to ASX that such information may have ceased to be confidential and therefore AHN 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 AHN may have for the recent trading in its securities?
- 4. Please confirm that AHN is complying with the Listing Rules and, in particular, Listing Rule 3.1.
- 5. Please confirm that AHN'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 AHN 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 **11.30am AWST today, Monday, 6 June 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, AHN'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 AHN 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 AHN'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 AHN's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

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

Stephanie Patchell
Senior Adviser, Listings Compliance (Perth)