

11 August 2022

Dale Allen  
ASX Compliance Pty Ltd  
Level 40, Central Park  
152-158 St Georges Tce  
Perth WA 6000

By email: [listingscomplianceperth@asx.com.au](mailto:listingscomplianceperth@asx.com.au)

Dear Mr Allen

**Hartshead Resources NL (ASX:HHR) – Response to ASX Price Query**

Hartshead Resources NL (**HHR** or the **Company**) refers to the ASX price query letter dated 11 August 2022.

The Company provides the following responses to the letter.

1. *Is HHR 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?*

HHR Response: No.

2. *If the answer to question 1 is “yes” ...*

HHR Response: Not applicable.

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

HHR Response: The Company does not have any other explanation for the recent trading in its securities. The Company notes an all-time record increase in the UK gas price with the gas futures price trading overnight in excess of £5.30 per therm for the UK 22/23 winter<sup>1</sup>. The ongoing conflict in Ukraine and the European energy crisis is heightening the general gas price escalation across Europe.

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

HHR Response: Confirmed.

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

HHR Response: Confirmed.

**Matthew Foy**  
**Company Secretary**  
**w: +61 8 9226 2011**  
**e: [info@hartshead-resources.com](mailto:info@hartshead-resources.com)**

<sup>1</sup> <https://www.theice.com/products/910/UK-Natural-Gas-Futures/data>



11 August 2022

Reference: 56908

Mr Matthew Foy  
Company Secretary  
Hartshead Resources NL

By email: matt.foy@ftcorporate.com.au

Dear Mr Foy

**Hartshead Resources NL ('HHR'): Price - Query**

ASX refers to the following:

- A. The change in the price of HHR's securities from a closing price of \$0.026 on 9 August 2022 to an intraday high of \$0.034 at the time of writing today, 11 August 2022.
- B. The significant increase in the volume of HHR's securities traded today 11 August 2022.

**Request for information**

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

- 1. Is HHR 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 HHR relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in HHR's securities would suggest to ASX that such information may have ceased to be confidential and therefore HHR 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 HHR may have for the recent trading in its securities?
- 4. Please confirm that HHR is complying with the Listing Rules and, in particular, Listing Rule 3.1.
- 5. Please confirm that HHR'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 HHR 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 **1:00 PM AWST Thursday, 11 August 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, HHR'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 HHR 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 HHR'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 HHR's securities under Listing Rule 17.3.

### Listing Rules 3.1 and 3.1A

In responding to this letter, you should have regard to HHR'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 HHR'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**  
Manager, Listings Compliance (Perth)