



5 December 2022

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

Dear Mr Mountain

Response to ASX price query

We refer to your letter, dated 5 December 2022, querying the change in trading price of shares in Highfield Resources Limited (ASX: HFR) (**Company**) from a closing price of \$0.805 on 2 December 2022 to an intra-day low of \$0.645 today (**Letter**).

In response to your questions outlined in the Letter, we provide the following information:

1. The Company is not 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 the Company's securities.
2. Not applicable.
3. The Company is not aware of any other explanation for the recent trading in its securities.
4. The Company confirms it is in compliance with the Listing Rules, in particular Listing Rule 3.1.
5. The Company confirms that the responses to the questions outlined in the letter have been authorised and approved by the Board of Directors.

Please do not hesitate to contact me if further information is required

Yours faithfully

Ms Katelyn Adams
Company Secretary
Highfield Resources Limited

Highfields Resources
ACN 153 918 257
ASX: HFR

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Highfield
Resources



5 December 2022

Reference: 65263

Ms Katelyn Adams
Company Secretary
Highfield Resources Limited

By email: kadams@hlbsa.com.au

Dear Ms Adams

Highfield Resources Limited ('HFR'): Price - Query

ASX refers to the following:

- A. The change in the price of HFR's securities from \$0.805 at the close of trading 2 December 2022 to an intraday low of \$0.645 today; and
- B. The significant increase in the volume of HFR's securities traded today.

Request for information

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

1. Is HFR 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 HFR relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in HFR's securities would suggest to ASX that such information may have ceased to be confidential and therefore HFR 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 HFR may have for the recent trading in its securities?
4. Please confirm that HFR is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that HFR'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 HFR 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 **2:30 PM AWST Monday, 5 December 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, HFR'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 HFR 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 HFR'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 HFR's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

In responding to this letter, you should have regard to HFR'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 HFR'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.

Regards

Nicholas Mountain

Adviser, Listings Compliance (Perth)