

30 July 2024

Ms Nicola Mullen
Senior Advisor
Australian Securities Exchange Limited
Level 40, Central Park
152 – 158 St Georges Terrace
PERTH WA 6000

RESPONSE TO ASX - PRICE QUERY

1. Is RCR 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.

However, RCR has recently completed a drilling program at the West Arunta Project – Pokali prospect, for which RCR has now received all assay results and prepared all necessary disclosures in accordance with the ASX Listing Rules and the JORC Code. RCR has provided an update to the market of this information today (**Announcement**). RCR does not consider that the information in the Announcement could explain the recent trading in its securities.

Completion of reverse circulation and diamond drilling at the West Arunta Project was announced on 29 May 2024, with final assay results for all holes received on 23 July 2024. In accordance with standard industry practice the final assay results were subject to review, analysis, quality assurance/quality control (QAQC) and interpretation. The QAQC process and interpretation of results was completed on the evening of 26 July 2024. RCR was finalising the Announcement, including seeking independent Competent Person review on July 29, at the time RCR received the price query.

RCR was relying on Listing Rule 3.1A not to disclose the assay results on or before 29 July 2024 and notes that:

- I. RCR has no reason to believe that confidentiality of the assay results had been lost at any time prior to it requesting a trading halt on 29 July 2024 and does not consider that any loss of confidentiality was the reason for the recent trading in its securities. However, RCR considers that the matters summarised in the response to Question 3 below may explain the recent trading.

- II. Whilst RCR believes it was able to rely on Listing Rule 3.1A not to announce the assay results under Listing Rule 3.1, considering the increase trading volume, RCR contacted ASX and requested a trading halt in order for Announcement to be finalised, reviewed and approved by the Board, and lodged by the Company Secretary on the ASX market announcement platform prior to market open on 30 July 2024.

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

- a. **Is RCR relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in RCR’s securities would suggest to ASX that such information may have ceased to be confidential and therefore RCR 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.**

Not applicable.

- 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).**

Not applicable.

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

Not applicable.

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

The following points may provide a further explanation for the recent trading in RCR securities:

- I. RCR released an announcement 24 April 2024 regarding a new ‘bullseye’ gravity target (referred to as ‘Avalon’) at the West Arunta Project which may represent a potential IOCG-style copper-gold system or equally a carbonatite-related niobium system.
- II. The potential presence of niobium mineralisation at the West Arunta has seen a significant increase in investor interest in RCR stock since 24 April 2024.
- III. RCR released an Announcement 15 July 2024 that it had commenced drilling at the West Arunta Project to test the Avalon target, among others.

- IV. It is RCR's opinion that investors may have anticipated an update regarding the progress of the current drilling at the Avalon target prior to July 29.
- V. The Company notes that the current RC and DDH drilling program to test the Avalon, Sheoak, K1 and K2 targets is near completion. In this regard, drilling at the Avalon target, both diamond and RC is complete together with RC drilling at K1 and K2, with the final hole completed 29 July 2024. Two more diamond holes remain with one hole in progress at Sheoak and the final diamond hole to be completed at K2.
- VI. The Company plans to update the market with initial observations upon completion, likely within the next 1-2 weeks. Assaying is likely to take several weeks with receipt of results anticipated from late September onwards.

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

RCR confirms that it is complying with the Listing Rules and, in particular, Listing Rule 3.1.

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

RCR confirm that its 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 RCR with delegated authority from the Board to respond to ASX on disclosure matters.

Yours sincerely,

Zane Lewis
Joint Company Secretary
Rincon Resources Limited

ENDS



29 July 2024

Mr Zane Lewis
Company Secretary
Rincon Resources Limited

By Email: zane@smallcapcorporate.com.au

Dear Mr Lewis

Rincon Resources Limited ('RCR'): Price - Query

ASX refers to the following:

- A. The change in the price of RCR's securities from a high of \$0.105 to a low of \$0.075 today, 29 July 2024.
- B. The significant increase in the volume of RCR's securities traded today.

Request for information

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

- 1. Is RCR 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 RCR relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in RCR's securities would suggest to ASX that such information may have ceased to be confidential and therefore RCR 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 RCR may have for the recent trading in its securities?
- 4. Please confirm that RCR is complying with the Listing Rules and, in particular, Listing Rule 3.1.
- 5. Please confirm that RCR'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 RCR 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 **11.30 AM AWST Monday, 29 July 2024**. 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, RCR'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 RCR 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 RCR’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 RCR’s securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

In responding to this letter, you should have regard to RCR’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 RCR’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

ASX reserves the right to release all or any part of this letter, your reply and any other related correspondence between us to the market under Listing Rule 18.7A.

Yours sincerely

ASX Compliance