

1 November 2024

Caitlyn Cooke  
Adviser, Listings Compliance  
Australian Securities Exchange  
By email: [ListingsCompliancePerth@asx.com.au](mailto:ListingsCompliancePerth@asx.com.au)

Dear Caitlyn

**TRIGG MINERALS LIMITED – RESPONSE TO ASX AWARE LETTER**

Trigg Minerals Limited (ASX: TMG) (**TMG** or the **Company**) refers to ASX's aware letter dated 29 October and provides the following responses to the queries set out in that letter (using the numbering from the aware letter).

Capitalised terms which are defined in ASX's aware letter have the same meaning where used in this letter unless the context requires otherwise.

1. **Does TMG consider the Drill Hole Results to be information that a reasonable person would expect to have a material effect on the price or value of its securities?**

No.

2. **If the answer to question 1 is "no", please advise the basis for the view commenting specifically on the security price increase and volume of securities traded on Monday, 28 October 2024.**

TMG does not consider the Drill Hole Results to have a material effect on its securities' price or value. Notably, TMG's Achilles Project, which includes one of the highest-grade antimony deposits globally, has generated significant international interest due to high antimony prices and the project's substantial potential for expansion. Investors may have responded to recent announcements, which highlighted the acquisition of the Achilles Project (refer ASX 30/9/2024) and the Company's active steps toward a JORC-compliant resource restatement at the Wild Cattle Creek deposit (refer ASX 8/10/2024). Given TMG's disclosure of plans to update and expand this resource in a strengthening antimony market, it is plausible that these factors contributed to the increased trading activity observed on 28 October 2024. However, the restated resource is still confidential and incomplete, and any potential impact on valuation remains speculative until the completion and announcement of the updated resource.

3. **When did TMG first become aware of the Drill Hole Results referred to in question 1 above?**

TMG first became aware of the Drill Hole Results referred to in question 1 on 27 October 2024. At this point in time, the Drill Hole Results were insufficiently definite to warrant disclosure for the reasons set out in the response to question 5 below.

4. **When did TMG receive the Drill Hole Results for LMRD001, LMRD002 and LMRD003? In answering this question please provide the date and time.**

TMG received the Drill Hole Results for LMRD001, LMRD002 and LMRD003 on 27 October 2024 at 4:15 pm (AWST).



5. **If TMG first became aware of the Drill Hole Results referred to in question 1 before the release of the Announcement, did TMG make any announcement prior to the time which it disclosed the information? If not, please explain why the information was not released to the market at an earlier time, commenting specifically on when you believe TMG was obliged to release the information under Listing Rules 3.1 and 3.1A and what steps TMG took to ensure that the information was release promptly and without delay.**

As noted in the responses to questions 3 and 4, TMG became aware of the Drill Hole Results before the release of the Announcement. TMG did not make any announcement prior to the time which it disclosed the information because once results of this nature are received by the Company, they are processed by TMG's geological team and the information treated as confidential. The results are compiled, validated and interpreted in the context of other drill results from the drill program to date. The significance of the Drill Hole Results could only be determined once this process has been completed.

In accordance with Listing Rule 3.1A, the Drill Hole Results were insufficiently definite to warrant disclosure at the time TMG became aware of the results. The Drill Hole Results were compiled, validated and interpreted in accordance with the process set out above, a draft ASX announcement prepared and reviewed by the Board and the Competent Person, with the consent of the Competent Person for inclusion of the Drill Hole Results in the final ASX announcement received at approximately 7:36 am (AWST) on 28 October 2024.

In accordance with Listing Rule 3.1, once the materiality of the Drill Hole Results was determined (following the prompt compilation, validation and interpretation of the results), the Drill Hole Results were released to the market.

6. **Noting the significant volume of securities traded prior to the release of the Announcement on Monday, 28 October 2024, did TMG consider whether a trading halt in its securities was necessary in order to manage its continuous disclosure obligations?**

The Company advises that the Drill Hole Results were the subject of strict security and confidentiality protocols until they were released. As demonstrated by the response to question 5, once the Drill Hole Results TMG announced the information to the market promptly and without delay. TMG therefore considers its continuous disclosure obligations were adequately managed.

The Company notes that it maintains strict security and confidentiality protocols in regard to drill results. In particular:

- TMG treats the security and confidentiality of all drill results with the upmost importance to enable the Company to adhere to its continuous disclosure obligations by announcing the outcome of a drilling program once sufficient information has been received to allow a meaningful interpretation of the results.
- Until release on the market announcements platform, the results of drilling are only known by the Company and contractors/consultants under appropriate confidentiality agreements.
- Data is stored on secure servers with access limited to TMG's geological team.



**7. Please confirm that TMG is in compliance with the Listing Rules, in particular, Listing Rule 3.1.**

TMG confirms that it is in compliance with the Listing Rules, in particular, Listing Rule 3.1.

**8. Please confirm that TMG's responses to the questions above have been authorised and approved in accordance with its published continuous disclosure policy or otherwise by its Board or an officer of TMG with delegated authority from the Board to respond to ASX on disclosure matters.**

TMG confirms that the responses to the questions above have been authorised and approved in accordance with its published continuous disclosure policy or otherwise by its Board or an officer of TMG with delegated authority from the Board to respond to ASX on disclosure matters.

Should you require any further clarification, please do not hesitate to contact us.

Yours sincerely

Nicholas Katris  
Company Secretary & Non-Executive Director  
Trigg Minerals Limited





29 October 2024

Mr Nicholas Katris  
Company Secretary  
Trigg Minerals Limited  
Level 1, 389 Oxford Street  
Mount Hawthorn WA 6016

By email: [nicholas.katris@trigg.com.au](mailto:nicholas.katris@trigg.com.au)

Dear Mr Katris

**Trigg Minerals Limited ('TMG'): ASX Aware Letter**

ASX refers to the following:

- A. The significant volume of TMG's securities traded on Monday, 28 October 2024 between the commencement of trade and 10:59 AM AEDT.
- B. TMG's announcement titled "SW LIMEY DRILLING - DISCOVERY OF A NEW EPITHERMAL SYSTEM" (the 'Announcement') released on the ASX Market Announcements Platform at 10:59 AM AEDT on Monday, 28 October 2024 disclosing that TMG had drill hole collar results and visual results associated with drill holes LMRD001, LMRD002 and LMRD003 drilled at its Old Glenroy project ('Drill Hole Results').
- C. The change in the price of TMG's securities from \$0.032 at close of trading on Thursday, 24 October 2024 to an intraday high of \$0.048 following the release of the Announcement.
- D. The significant volume of TMG's securities traded on Monday, 28 October 2024, reflecting a record volume of securities traded in a single trading day.
- E. Listing Rule 3.1, which requires a listed entity to immediately give ASX any information concerning it that a reasonable person would expect to have a material effect on the price or value of the entity's securities.
- F. The definition of "aware" in Chapter 19 of the Listing Rules, which states that:  
*"an entity becomes aware of information if, and as soon as, an officer of the entity (or, in the case of a trust, an officer of the responsible entity) has, or ought reasonably to have, come into possession of the information in the course of the performance of their duties as an officer of that entity."*
- G. Section 4.4 in *Guidance Note 8 Continuous Disclosure: Listing Rules 3.1 – 3.1B* titled "When does an entity become aware of information?"
- H. Listing Rule 3.1A, which sets out exceptions from the requirement to make immediate disclosure as follows.

*"3.1A Listing rule 3.1 does not apply to particular information while each of the following is satisfied in relation to the information:*

*3.1A.1 One or more of the following 5 situations applies:*

- *It would be a breach of a law to disclose the information;*
- *The information concerns an incomplete proposal or negotiation;*
- *The information comprises matters of supposition or is insufficiently definite to warrant disclosure;*

- *The information is generated for the internal management purposes of the entity; or*
- *The information is a trade secret; and*

3.1A.2 *The information is confidential and ASX has not formed the view that the information has ceased to be confidential; and*

3.1A.3 *A reasonable person would not expect the information to be disclosed."*

- I. The concept of "confidentiality" detailed in section 5.8 of Guidance Note 8 *Continuous Disclosure: Listing Rules 3.1 – 3.1B*. In particular, the Guidance Note states that:

*"Whether information has the quality of being confidential is a question of fact, not one of the intention or desire of the entity. Accordingly, even though an entity may consider information to be confidential and its disclosure to be a breach of confidence, if it is in fact disclosed by those who know it, then it is no longer a secret and it ceases to be confidential information for the purposes of this rule."*

### **Request for information**

Having regard to the above, ASX asks TMG to respond separately to each of the following questions:

1. Does TMG consider the Drill Hole Results to be information that a reasonable person would expect to have a material effect on the price or value of its securities?
2. If the answer to question 1 is "no", please advise the basis for that view commenting specifically on the security price increase and volume of securities traded on Monday 28, October 2024.
3. When did TMG first become aware of the Drill Hole Results referred to in question 1 above?
4. When did TMG receive the Drill Hole Results for LMRD001, LMRD002 and LMRD003? In answering this question please provide the date and time.
5. If TMG first became aware of the Drill Hole Results referred to in question 1 before the release of the Announcement, did TMG make any announcement prior to that time which disclosed the information? If not, please explain why the information was not released to the market at an earlier time, commenting specifically on when you believe TMG was obliged to release the information under Listing Rules 3.1 and 3.1A and what steps TMG took to ensure that the information was released promptly and without delay.
6. Noting the significant volume of securities traded prior to the release of the Announcement on Monday, 28 October 2024 did TMG consider whether a trading halt in its securities was necessary in order to manage its continuous disclosure obligations?
7. Please confirm that TMG is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.
8. Please confirm that TMG's responses to the questions above have been authorised and approved in accordance with its published continuous disclosure policy or otherwise by its board or an officer of TMG 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 **12 PM AWST Friday, 1 November 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, TMG's obligation is to disclose the information 'immediately'. This may require the information to be disclosed before

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the deadline set out above and may require TMG to request a trading halt immediately if trading in TMG's securities is not already halted or suspended.

Your response should be sent by e-mail to **ListingsCompliancePerth@asx.com.au**. It should not be sent directly to the ASX Market Announcements Office. This is to allow us 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.

### **Suspension**

If you are unable to respond to this letter by the time specified above, ASX will likely suspend trading in TMG's securities under Listing Rule 17.3.

### **Listing Rules 3.1 and 3.1A**

In responding to this letter, you should have regard to TMG'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 TMG'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 all or any part of this letter, your reply and any other related correspondence between us to the market under listing rule 18.7A. The usual course is for the correspondence to be released to the market.

Yours sincerely

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ASX Compliance