



ABN 39 151 155 207

5 December 2024
Daniel Nugawela
Adviser, Listing Compliance (Perth)
ASX Limited
Level 40, Central Park
152-158 St Georges Terrace
Perth WA 6000

By email: ListingsCompliancePerth@asx.com.au

Dear Daniel,

Estrella Resources Limited (ASX: ESR) – Response to Price and Volume Query

Estrella Resources Limited (**ESR**) refers to your letter dated 5 December 2024 and provides the following responses:

- 1. Is ESR 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. The Company is not aware of any information concerning it that has not been announced to market that could explain recent trading in its securities.

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

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

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).**

N/A

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

N/A



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

No, the Company believes its recent announcements and more-so its Investor Presentation *“Hong Kong & Singapore Investor Presentation”* announced 26 November 2024, on its Timor-Leste Project have contributed to the recent trading in securities.

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

The Company confirms that it is in compliance with its ASX Listing Rules and in particular Listing Rule 3.1

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

I can confirm that the above responses are authorised by the Board of Directors.

Yours sincerely

Ben Smith
Joint Company Secretary
Estrella Resources Limited



5 December 2024

Reference: 104165

Mr Benjamin Smith
Joint Company Secretary
Estrella Resources Limited

By email

Dear Mr Smith

Estrella Resources Limited ('ESR'): Price and Volume - Query

ASX refers to the following:

- A. The change in the price of ESR's securities from a low of \$0.018 at close on 4 December 2024 to a high of \$0.025 today.
- B. The significant increase in the volume of ESR's securities traded today.

Request for information

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

- 1. Is ESR 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 ESR relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in ESR's securities would suggest to ASX that such information may have ceased to be confidential and therefore ESR 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 ESR may have for the recent trading in its securities?
- 4. Please confirm that ESR is complying with the Listing Rules and, in particular, Listing Rule 3.1.
- 5. Please confirm that ESR'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 ESR 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 **2.00 PM AWST Thursday, 5 December 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, ESR'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 ESR 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 ESR'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 ESR's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

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