

24 January 2025

ASX Listings Compliance ASX Limited Level 40 Central Park 152-158 St Georges Terrace Perth WA 6000

By email: ListingsCompliancePerth@asx.com.au

Dear Sir/Madam

# **ASX Query Letter - Cleansing Notice Timing**

Meeka Metals Limited ("**Meeka**" or the "**Company**") refers to correspondence from the ASX dated 21 January 2025 regarding the Company's announcement entitled 'Conversion of Unlisted Options & Cleansing Notice' released on the ASX Market Announcements Platform at 17:35 PM AEDT on 20 January 2025.

Capitalised terms which are defined in the ASX letter have the same meaning where used in these responses, unless the context requires otherwise.

The Company's responses are as follows:

- 1. No.
- 2. The information disclosed in the Announcement is results from infill grade control drilling that was drilled in close proximity to pre-existing drilling and is used to verify and confirm the grade of the Company's existing Mineral Resource. In this instance the holes were drilled between existing drill holes and between existing lines of drilling. No drill results released in the Announcement intersected new or previously unidentified mineralisation and no drill results released in the Announcement are from exploration drilling. The results confirm the grade in the existing previously released drilling (released on the ASX platform between 2021 and 2024) and in the existing previously released Mineral Resource (released on the ASX platform on 17 April 2024).

The reason the Announcement was released and marked "price sensitive" was to distinguish it from routine procedural disclosure and because administratively the Company has taken a conservative approach to the assessment of materiality, which is generally to classify and release as market sensitive, information in the nature of drilling results.

- 3. No.
- 4. The information was from grade control drilling, as per response to question 2.
- 5. Not applicable.
- 6. Not applicable.
- 7. Not applicable.
- 8. Not applicable.



- 9. The Company is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.
- 10. The Company's responses to the questions above have been authorised and approved by the Company's Managing Director, being an officer of the Company with delegated authority from the board to respond to ASX on disclosure matters in accordance with the Company's published continuous disclosure policy.

Yours faithfully

Tony Brazier

Company Secretary



21 January 2025

Reference: ODIN105384

Mr Tony Brazier Company secretary Meeka Metals Limited Second Floor, 46 Ventnor Avenue West Perth, Western Australia 6005

By email: tbrazier@meekametals.com.au

Dear Mr Brazier

#### Meeka Metals Limited ('MEK'): Cleansing Notice Timing

ASX refers to the following:

A. MEK's announcement entitled 'Conversion of Unlisted Options & Cleansing Notice' released on the ASX Market Announcements Platform ('MAP') at 17:35 PM AEDT on 20 January 2025 (the 'Cleansing Notice'), disclosing amongst other things:

"[...]

- as at the date of this notice the Company has complied with:
- (i) the provision of Chapter 2M of the Corporations Act as they apply to the Company; and
- (ii) Sections 674 and 674A of the Corporations Act as it applies to the Company;
- as at the date of this announcement, there is no excluded information of the type referred to in Sections 708A(7) and 708A(8) of the Corporations Act."
- B. MEK's announcement titled "33m @ 3.07gt Au More Thick High Grade Gold at St Anne's" (the 'Announcement') released on MAP at 8:19 AM AEDT on 21 January 2025 disclosing the following:
  - 1.1 MEK had received new results from the ongoing drilling at St Anne's ahead of mining in the March 2025 quarter (the 'New Results'); and
  - 1.2 The New Results include:
    - 1.2.1 33m @ 3.07g/t Au from 42m including 8m @ 4.51g/t Au and 6m @ 4.58g/t Au and 1m @ 28.50g/t Au (24SAGC035);
    - 1.2.2 12m @ 5.76g/t Au from 51m including 3m @ 16.35g/t Au (24SAGC010);
    - 1.2.3 7m @ 9.71g/t Au from 78m including 1m @ 34.10g/t Au (24SAGC021);
    - 1.2.4 11m @ 4.13g/t Au from 91m including 1m @ 33.30g/t Au (24SAGC018);
    - 1.2.5 2m @ 22.15g/t Au from 70m including 1m @ 34.20g/t Au (24SAGC037);
    - 1.2.6 4m @ 9.20g/t Au from 57m including 1m @ 35.40g/t Au (24SAGC017);
    - 1.2.7 3m @ 11.05g/t Au from 82m including 1m @ 24.10g/t Au (24SAGC010);
    - 1.2.8 15m @ 2.16g/t Au from 54m including 2m @ 11.30g/t Au (24SAGC009);
    - 1.2.9 15m @ 2.13g/t Au from 34m including 1m @ 18.95g/t Au (24SAGC020);

- 1.3 6m @ 5.07g/t Au from 58m including 1m @ 23.70g/t Au (24SAGC038);
- 1.4 14m @ 2.23g/t Au from 72m including 5m @ 4.50g/t Au (24SAGC017);
- 1.5 14m @ 2.13g/t Au from 52m including 1m @ 12.20g/t Au (24SAGC015);
- 1.6 14m @ 2.02g/t Au from 53m including 1m @ 15.85g/t Au (24SAGC039);
- 1.7 5m @ 5.41g/t Au from 59m including 3m @ 8.43g/t Au (24SAGC032);
- 1.8 12m @ 2.22g/t Au from 44m including 3m @ 5.39g/t Au (24SAGC014);
- 1.9 27m @ 1.12g/t Au from 24m including 8m @ 2.15g/t Au (24SAGC032);
- 1.10 3m @ 8.74g/t Au from 73m including 1m @ 20.90g/t Au (24SAGC033);
- 1.11 2m @ 12.90g/t Au from 27m including 1m @ 23.40g/t Au (24SAGC033);
- 1.12 9m @ 2.55g/t Au from 56m including 1m @ 9.49g/t Au (24SAGC004);
- 1.13 4m @ 4.60g/t Au from 42m including 2m @ 7.16g/t Au (24SAGC018);
- 1.14 10m @ 1.75g/t Au from 43m (24SAGC037);
- 1.15 6m @ 2.48g/t Au from 41m including 1m @ 9.34g/t Au (24SAGC017);
- 1.16 4m @ 3.83g/t Au from 47m including 2m @ 5.18g/t Au (24SAGC004);
- 1.17 3m @ 3.55g/t Au from 78m including 1m @ 8.90g/t Au (24SAGC039);
- 1.18 1m @ 9.96g/t Au from 51m (24SAGC026);
- 1.19 6m @ 1.60g/t Au from 58m (24SAGC040);
- 1.20 2m @ 4.36g/t Au from 62m including 1m @ 7.62g/t Au (24SAGC014);
- 1.21 3m @ 2.77g/t Au from 81m including 1m @ 6.36g/t Au (24SAGC033);
- 1.22 5m @ 1.39g/t Au from 50m (24SAGC028);
- 1.23 3m @ 2.27g/t Au from 57m including 1m @ 5.78g/t Au (24SAGC025);
- 1.24 2m @ 3.24g/t Au from 77m including 1m @ 5.44g/t Au (24SAGC009);
- 1.25 1m @ 5.09g/t Au from 80m (24SAGC015);
- 1.26 3m @ 1.48g/t Au from 35m (24SAGC031); and
- 1.27 4m @ 1.04g/t Au from 26m including 1m @ 2.30g/t Au (24SAGC023).
- C. Section 708A(7) of the Corporations Act 2001 (Cth) (the 'Act') which states:

'For the purposes of subsection (6), excluded information is information:

- (a) that has been excluded from a continuous disclosure notice in accordance with the listing rules of the relevant market operator to whom that notice is required to be given; and
- (b) that investors and their professional advisers would reasonably require for the purpose of making an informed assessment of:
  - (i) the assets and liabilities, financial position and performance, profits and losses and prospects of the body; or
  - (ii) the rights and liabilities attaching to the relevant securities.'

D. The definition of 'aware' in Chapter 19 of the Listing Rules. This definition 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.'

Additionally, you should refer to section 4.4 in Guidance Note 8 *Continuous Disclosure*: Listing Rules 3.1 – 3.1B 'When does an entity become aware of information?'.

- E. Listing Rule 3.1A, which sets out exceptions from the requirement to make immediate disclosure, provided that each of the following are satisfied.
  - '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.'

## **Request for information**

Having regard to the above, ASX asks MEK to respond separately to each of the following questions.

- 1. Does MEK consider the information disclosed in the Announcement and in particular, the New Results, or any part thereof to be information that investors and their professional advisers would reasonably require for the purpose of making an informed assessment of either:
  - 1.1 the assets and liabilities, financial position and performance, profits and losses and prospects of MEK; or
  - 1.2 the rights and liabilities attaching to the relevant securities?
- 2. If the answer to either limb of question 1 is "no", please advise the basis for that view.
- 3. Does MEK consider the Announcement to include information which it is reasonable for investors and their professional advisers to expect to find in a disclosure document?
- 4. If the answer to question 3 is "no", please advise the basis for that view.
- 5. If the answer to question 3 is "yes", please detail the information.

- 6. If the answer to either limb in question 1 is "yes", when did MEK first become aware of the New Results, or any part thereof? In answering this question, please specify the date and time when MEK first became aware of the New Results, or any part thereof.
- 7. If MEK first became aware of the New Results, or any part thereof before lodging the Cleansing Notice on MAP, was MEK relying on the provisions of Listing Rule 3.1A not to release the information before MEK lodged the Announcement on MAP?
- 8. If MEK first became aware of the New Results, or any part thereof prior to the lodging of the Cleansing Notice on MAP, please explain why the information was not set out in the Cleansing Notice pursuant to the Act?
- 9. Please confirm that MEK is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.
- 10. Please confirm that MEK'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 MEK 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 9:00 AM AWST Friday, 24 January 2025.

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, MEK's obligation is to disclose the information 'immediately'. This may require the information to be disclosed before the deadline set out above and may require MEK to request a trading halt immediately if trading in MEK'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 MEK's securities under Listing Rule 17.3.

#### Listing Rules 3.1 and 3.1A

In responding to this letter, you should have regard to MEK'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 MEK'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		
ASX Compliance		