

25 May 2020

Ms Belinda Giles
Adviser, Listings Compliance
ASX Compliance Pty Ltd
Level 40, Central Park
152-158 St Georges Terrace
Perth WA 6000

By e-mail: belinda.giles@asx.com.au

Dear Belinda,

RE: Response to ASX Aware Letter Query

GTI Resources Limited (ASX: GTR) (**GTR**, **GTI** or the **Company**) refers to your Aware Letter Query dated 22 May 2022 and provides the following responses:

1. No.
2. The Board does not consider the calibrated gamma geophysical logs taken from historical holes at the Jeffrey Project (**Survey Information**) to be price sensitive information in and of themselves for the following reasons:
 - a. GTI completed the down-hole gamma logging program to aid in the final planning of a permitted, near term drill program at the Jeffrey project. The logging program leveraged existing open historical drill holes from the late 1970s which had not been properly abandoned. The location of these available drill holes was based solely on influence of surficial processes including alluvium/colluvium deposition which could serve to partially or fully fill the historical drill holes. As such, the location of the drill holes included in the GTI logging program was somewhat random in nature, with most historical drill hole locations falling outside of GTI's area of proposed drilling. This gamma logging program could be most favourably compared to a outcrop mapping program, utilising available and observable geologic information and measurements to determine the nature, and overall trend of mineralisation; and
 - b. The results from the gamma logging program included many drill holes that were interpreted to be partially infilled with sediment and therefore too shallow to penetrate the mineralised horizon, numerous drill holes that presented gamma shows (anomalies) associated with uranium mineralisation, and a few intercepts of low to moderate grade uranium mineralisation as determined through the calibrated gamma logging. These results were consistent with GTI's expectations for the programme and

included confirmation that uranium mineralisation existed behind outcrop and underground exposure. Subsequent to obtaining the results from the drill program, no changes have been made to GTI's near term drilling program.

3. SRK Consulting completed initial preliminary analysis of the Survey Information on 14 May 2020 when it was provided to GTI in a raw, unverified data form and had not had interpretation completed on it. SRK completed the QA/QC review of the raw data, including verifying the preliminary calculations on 19 May 2020 and a draft ASX release was prepared that incorporated geological interpretation on 20 May 2020. The Competent Person completed his review at 11:45pm (WST) on 20 May 2020 following which the Survey Information was released on ASX at 7:18am (WST) on 21 May 2020.
4. Not applicable.
5. The Competent Person completed his review at 11:45pm (WST) on 20 May 2020 following which the Survey Information was released on ASX at 7:18am (WST) on 21 May 2020.
6. The Company confirms it is in compliance with the listing rules and, in particular, listing rule 3.1.
7. The Company confirms the responses to the questions above are authorised and approved by its Board.

Sincerely,

Emma Gilbert
Company Secretary
GTI Resources Limited
Tel: +61 8 9226 2011



22 May 2020

Reference: 18540

Ms Emma Gilbert
Company Secretary
GTI Resources Limited
7/24 Walters Drive
OSBORNE PARK WA 6017

By email

Dear Ms Gilbert

GTI Resources Limited ('GTR' or the 'Company'): Aware Query

ASX refers to the following:

A. ASX's price query letter dated 18 May 2020 ('Price Query') and GTR's response to the Price Query also dated 18 May 2020, released together on the ASX Market Announcements Platform ('MAP') at 1:06 PM AEST on 18 May 2020 in which GTR responded to each question as follows (responses in italics and footnotes omitted):

1. Is GTR 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?

The Company is not aware of any information concerning it that has not been announced which, if known, could be an explanation for recent trading in the securities of the Company.

2. If the answer to question 1 is "yes".

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

Not applicable.

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

On 29 April 2020, GTR announced that it had commenced fieldwork on its prospective uranium and vanadium exploration properties in the prolific Henry Mountains region of the US state of Utah.

During the period leading up to and after this announcement the uranium spot market price strengthened markedly and on April 23, 2020, U.S. Secretary of Energy Dan Brouillette announced the US government's strategy and vision for nuclear energy leadership with the release of a Department of Energy report entitled "RESTORING AMERICA'S COMPETITIVE NUCLEAR ENERGY ADVANTAGE". The report outlines a number of specific measures designed to stimulate the industry including the creation

of a strategic uranium reserve through US\$1.5bn of government purchasing of uranium over 10 years from US domestic uranium producers.

We believe these factors have significantly increased media and investor interest in uranium miners and explorers across the sector and the globe with US producers and explorers receiving special interest and investor attention due to the US governments [sic] strong statements of intent and industry stimulus measures.

In particular we believe that investors may buying [sic] GTI shares in order to get exposure to potentially positive results from the company's upcoming maiden drill program.

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

The Company confirms it is in compliance with the listing rules and, in particular, listing rule 3.1.

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

The Company confirms the responses to the questions above are authorised and approved in accordance with its published continuous disclosure policy.

- B. GTR's announcement entitled "Uranium & Vanadium Drill Program Fast Tracked to Comment in June" lodged on MAP and released at 9:18 AM AEST on 21 May 2020 (the 'Announcement'), in which GTR announced that it had obtained positive results from the completion of its downhole geophysical logging of 26 open historical drill holes at its Jeffrey Project ('Survey'). The Announcement stated the results of the Survey, including:

- (a) the complete results of the Survey as set out in Table 1 on page 12 of the Announcement;
- (b) that the calibrated gamma geophysical logs in the historical drill holes had provided equivalent U_3O_8 grades;
- (c) that the downhole surveys demonstrated consistent continuation of known mineralisation under cover at two locations within the Jeffrey Project; and
- (d) that numerous zones of mineralisation were intercepted at the historical drill holes, including an intercept of 0.3m of 0.234% of equivalent U_3O_8 .

The results of the Survey as announced in the Announcement and described above are referred to in this letter as the 'Information'.

- C. 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.
- D. 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" and 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 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."*

F. ASX's policy position on the concept of "confidentiality", which is 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 listed 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 ceases to be confidential information for the purposes of this rule."

Questions and Requests for Information

Having regard to the above, ASX asks GTR to respond separately to each of the following questions and requests for information:

1. Does GTR consider the Information 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.
3. When did GTR first become aware of the Information?
4. If the answer to question 1 is "yes" and GTR first became aware of the Information before 21 May 2020, did GTR make any announcement prior to 21 May 2020 which disclosed the information?
 - 4.1 If so, please provide details.
 - 4.2 If not, please explain why this information was not released to the market at an earlier time, commenting specifically on when you believe GTR was obliged to release the Information under Listing Rules 3.1 and 3.1A and what steps GTR took to ensure the Information was released promptly and without delay.
5. When did the competent person referred to in the Announcement (or a representative of that competent person) communicate the Information to the Company?
6. Please confirm that GTR is complying with the Listing Rules and, in particular, Listing Rule 3.1.
7. Please confirm that GTR'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 GTR 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 **3:00 PM AWST Tuesday, 26 May 2020**

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, GTR'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 GTR to request a trading halt immediately.

If you wish to request 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.

ASX reserves the right to release a copy of this letter and your response on the ASX Market Announcements Platform under Listing Rule 18.7A. Accordingly, your response should be in a form suitable for release to the market.

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.

Listing Rules 3.1 and 3.1A

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

Suspension

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

Enquiries

If you have any queries or concerns about any of the above, please contact me immediately.

Yours faithfully

Belinda Giles

Adviser, Listings Compliance (Perth)