

15 November 2023

ASX Limited
Level 40, Central Park
152 – 158 St George’s Terrace
Perth WA 600
By email: ListingsCompliancePerth@asx.com.au

Attention: Sean Maloney, Adviser, Listings Compliance (Perth)

Dear Mr Maloney

Titanium Sands Limited (‘TSL’): Response to ASX Price Query

We refer to your letter dated 15 November 2023 and as requested, we set out below the Company’s response to your queries (using the numbering and lettering in your letter) as follows:

1. No
2. Not applicable.
3. The Company is not aware of any other explanation for the recent trading in its shares. The Company would like to note it is currently preparing an addendum to its notice of AGM in order to add additional resolutions for consideration at the Meeting. The resolutions relate to approval for the late placement of shortfall under the Company’s recently completed rights issue, approval to issue securities to a major shareholder lender on conversion of convertible notes and approval to issue securities to management personnel as equity based remuneration. The addendum is expected to be finalised and dispatched shortly, but does not otherwise explain the recent trading in the Company’s shares.
4. The Company confirms that it is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. The Company confirms that the responses have been approved by the Board of Directors of TSL.

Yours faithfully

Alan Armstrong
Company Secretary



15 November 2023

Reference: 84782

Mr Alan David Stephen Armstrong
Company Secretary
Titanium Sands Limited

By email:

Dear Mr Armstrong

Titanium Sands Limited ('TSL'): Price - Query

ASX refers to the following:

A. The change in the price of TSL's securities from a low of \$0.011 to an intraday high of \$0.019 today.

Request for information

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

1. Is TSL 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 TSL relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in TSL's securities would suggest to ASX that such information may have ceased to be confidential and therefore TSL 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 TSL may have for the recent trading in its securities?
4. Please confirm that TSL is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that TSL'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 TSL 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 **1:30 PM AWST Wednesday, 15 November 2023**. 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, TSL'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 TSL 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 TSL'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 TSL's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

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

Questions

If you have any questions in relation to the above, please do not hesitate to contact me.

Yours sincerely

Sean Maloney
Senior Adviser, Listings Compliance