



24 October 2023

ASX: STK

Australian Securities Exchange
Level 40, Central Park
152-158 St George's Terrace
PERTH WA 6000

Attention: Ms Barbara Lim
Adviser, Listing Compliance
By email: barbara.lim@asx.com.au;

Dear Ms Lim,

Re: Strickland Metals Limited (ASX:STK): General – Aware Query, Reference: 82542

We refer to your letter to Strickland Metals Limited ("**Strickland**" or the "**Company**") dated 19 October 2023 titled *Strickland Metals Limited ("STK"): General – Aware Query*.

We respond to each of your queries as follows:

1. Does STK 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?

Yes.

2. If the answer to question 1 is "no", please advise the basis for that view.

Not applicable.

3. When did STK first become aware of the Information?

The Company provides the following timeline in relation to the assay results in respect to the aircore drilling at its Marwari Prospect disclosed in Appendix A of the announcement dated 19 October 2023 (**Announcement**) (the **Information**):

- (a) There were a number of assays referenced in Appendix A of the Announcement (HWAC1275 to HWAC1365, HWAC1376 to HWAC1499 and HWAC1515 to HWAC1518) which had already been previously released on the Market Announcements Platform (**MAP**) (**Previously Announced Assays**).
- (b) The Previously Announced Assays were released on MAP on 19 September 2023, 27 September 2023 and 2 October 2023 and prior to the ASX's Price and Volume Query sent to the Company on 13 October 2023 (**Price and Volume Query Letter**).
- (c) Between 26 September 2023 and 9 October 2023, the Company received:
 - i. assay results for HWAC1500 to HWAC1514;
 - ii. assay results for HWAC1519 to HWAC1555; and
 - iii. assay results for HWAC1563 to HWAC1588,
(together, the **Incomplete Assay Information**).

- (d) At the time of responding to the Price and Volume Query, the Incomplete Assay Information was incomplete and preliminary for the Company to form a view on materiality, for the reasons set out below:
- i. The Incomplete Assay Information was broadly in line with expectations of what the Company had previously communicated to the market:
 - A. On 19 September 2023, the Company stated that the apparent mineralised structure had been intersected approximately 350m to the south;
 - B. On 27 September 2023, the Company announced that the Marwari system had now been intersected over 500m of strike length; and
 - C. The Incomplete Assay Information confirms the above observations without providing any additional upside (or downside) to the anticipated broad anomalism expectations;
 - ii. Aircore drilling is typically geochemical drilling designed to detect low levels of anomalism. It is not common for this type of drilling to yield significant discoveries given the shallow depths aircore rigs typically penetrate. The Company was fortunate that the first Marwari discovery hole (announced on 19 September 2023) (HWAC1472: 31m @ 5.6g/t Au from 72m (to BOH), including 8m @ 17.7g/t Au) penetrated into fresh primary rock more than any other nearby holes, thereby providing a more significant assay string which the Company was able to declare as a new gold discovery;
 - iii. The assays from the Discovery Hole (defined below) received on 16 October 2023, which included 16m @ 2.2g/t Au was the main outstanding hole to complete the long section of mineralisation. Without the context provided for by the Discovery Hole, the Incomplete Assay Information was not material; and
 - iv. At the time of receiving the Price and Volume Query, the Company considered that the Incomplete Assay Information was:
 - A. not material to investors, as it did not provide any information which would materially contribute to the understanding of the distribution of the mineralisation at the Marwari Prospect, further to the information already in the market; and
 - B. without further context, likely to be misleading, as further assay information was required to provide a representative sample of the drilling undertaken.
- (e) At 12:55pm AWST on 16 October 2023, the Company received raw assay data in relation to HWAC1556 to HWAC1562, which included a significant intercept of 16m @ 2.2g/t Au from 68m in respect of HWAC1562 (**Discovery Hole**) (together, the **16 October Assay Information**).
- (f) In light of the Discovery Hole, the Company reinterpreted the Incomplete Assay Information.
- (g) On the morning of 17 October 2023, the Company had sufficiently interpreted the Incomplete Assay Information and the 16 October Assay Information, and the Company's management and technical team had resolved that the Incomplete Assay Information together with the 16 October Assay Information constituted material assay information (**Material Assay Information**), and resolved to immediately disclose the Material Assay Information.



- (h) At 6:02am AWST on 19 October 2023, the Company disclosed the Material Assay Information via the Announcement on MAP.
- (i) As set out above, the Information comprises:
- i. the Previously Announced Assays;
 - ii. the Incomplete Assay Information; and
 - iii. the 16 October Assay Information.
- (j) The Company became aware of the Information at different stages as set out above. The Company's management and technical team formed the view on the morning of 17 October 2023 that the Information comprised the Material Assay Information and announced the Information on MAP at 6:02am AWST on 19 October 2023.
- 4. If the answer to question 1 is "yes" and STK first became aware of the Information before the relevant date, did STK make any announcement prior to the relevant date which disclosed the information? If so, please provide details. If not, please explain why the Information was not released to the market at an earlier time, commenting specifically on when you believe STK was obliged to release the Information under Listing Rules 3.1 and 3.1A and what steps STK took to ensure that the Information was released promptly and without delay?**

The answer to question 1 is partially yes. As at the relevant date, being the date of the Price and Volume Query received by the Company on 13 October 2023 (**Relevant Date**), the Company was:

- (a) aware of the Previously Announced Assays, which had been announced;
- (b) aware of the Incomplete Assay Information; and
- (c) not aware of the 16 October Assay Information, which included the Discovery Hole.

As set out above, the Previously Announced Assays were announced on MAP on 19 September 2023, 27 September 2023 and 2 October 2023. As at the Relevant Date, the Incomplete Assay Information in isolation remained incomplete and immaterial to warrant disclosure. It was not until the 16 October Assay Information was received at 12:55pm AWST on 16 October 2023 that the Company reinterpreted the Incomplete Assay Information together with the 16 October Assay Information and resolved that immediate disclosure of the Material Assay Information was required.

In order to ensure the Information was released promptly and without delay, the Company took the following steps in accordance with its continuous disclosure policy:

- (a) the Chief Executive Officer immediately commissioned a draft of the 19 October 2023 announcement which included the Information (**Draft Announcement**);
- (b) the Draft Announcement was sent by the Chief Executive Officer to the Company's technical team at 4:43am AWST on 18 October 2023 for comment;
- (c) the Draft Announcement was returned to the Chief Executive Officer at 10:55am AWST on 18 October 2023;
- (d) the Draft Announcement was finalised at 6:10pm AWST on 18 October 2023; and

- (e) the Announcement containing the Information was lodged on MAP at 6:02am AWST on 19 October 2023.

The Company considers that:

- (a) confidentiality was maintained with respect to the Incomplete Assay Information and 16 October Assay Information at all times up until it was announced to the market on 19 October 2023; and
- (b) the Information was released promptly and without delay in accordance with Listing Rule 3.1, having regard to the time need to complete an analysis of the results and draft a complete announcement.

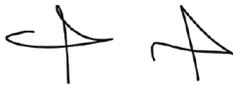
5. Please confirm that STK is complying with the Listing Rules and, in particular, Listing Rule 3.1.

We confirm that the Company is, and remains in compliance with the Listing Rules and, in particular Listing Rule 3.1.

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

The Company's responses to the questions above have been authorised and approved by the Chairman and the Chief Executive Officer of the Company who both have delegated authority from the board to respond to ASX on disclosure matters.

Yours faithfully



Sleiman Majdoub
Company Secretary
Strickland Metals Limited
Phone: +61 (8) 6317 9875

stricklandmetals.com.au



19 October 2023

Reference: 82542

Mr Sleiman Majdoub
Company Secretary
Strickland Metals Limited

By email

Dear Mr Majdoub

Strickland Metals Limited ('STK'): General – Aware Query

ASX refers to the following:

- A. The change in price of STK's securities from an intraday low of \$0.087 on Thursday, 12 October 2023 to an intraday high of \$0.11 on Friday, 13 October 2023, and the significant increase in the volume of securities traded during that same period.
- B. ASX's price and volume query letter dated 13 October 2023 ('Price and Volume Query') and STK's response to the Price and Volume Query dated 13 October 2023, released together on the ASX Market Announcements Platform ('MAP') at 3:00 PM AEDT on Friday, 13 October 2023, disclosing amongst other things, the following:

"1. Is STK 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, which, if, known by some in the market, could explain the recent trading in its securities.

...

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

Over the last month, Strickland has released a number of extremely positive developments at its Yandal Gold Project in Western Australia.

On 19 September 2023, Strickland announced a promising new discovery at the Marwari Prospect (31m @ 5.6g/t Au from 72m). Follow up drilling has occurred and the Company signalled to the market it is expecting assays from this drilling shortly.

On 2 October 2023, the Company released an additional discovery at the nearby Konik Prospect (58m @ 1.7g/t Au from 17m). Follow up drilling is currently in progress and initial assays are expected in November.

Earlier this week on 10 October 2023, Strickland announced a heritage survey was underway. The announcement detailed two proximal large-scale, high-priority, tier 1 potential targets - Great Western (gold) and Rabbit Well (base metals) - which the Company stated will be drilled tested within the coming month (subject to obtaining heritage clearance). The Company has booked a reverse circulation (RC) rig to arrive in approximately two weeks, with a diamond rig arriving the following week.

On 11 October 2023, Strickland released an investor presentation which detailed the Company's recent exploration successes and outlined drilling plans for the remainder of the 2023. Significant exploration programs will continue into 2024. The Company has also continued to highlight its exceptionally strong

balance sheet after completing the sale of its Millrose Gold Project to Northern Star Resources Ltd in July 2023 for approximately \$61 million.

The information in this letter that relates to Exploration Results has been extracted from various Strickland ASX announcements and are available to view on the Company's website at www.stricklandmetals.com.au or through the ASX website at www.asx.com.au (using ticker code "STK").

The Company confirms that it is not aware of any new information or data that materially affects the information included in the original market announcements. The Company confirms that the form and context in which the Competent Person's findings are presented have not materially changed from the original market announcement."

- C. The change in price of STK's securities from a close of \$0.10 on Friday, 13 October 2023 to an intraday high of \$0.11 on Monday, 16 October 2023.
- D. STK's announcement entitled "Drilling Defines Large Gold Target at Marwari" lodged on MAP and released at 9:02 AM AEDT on Thursday, 19 October 2023 (the 'Announcement'), disclosing, amongst other things, that STK had received assay results in respect to the aircore drilling at its Marwari Prospect, which results are detailed in Appendix A of the Announcement ('Information').
- E. The change in price of STK's securities from a close of \$0.085 on Wednesday, 18 October 2023 to an intraday high of \$0.097 today at the time of writing this letter, following the release of the Information.
- F. 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.
- G. 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."

- H. 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."

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- I. 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."

Request for information

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

1. Does STK 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 STK first become aware of the Information?
4. If the answer to question 1 is "yes" and STK first became aware of the Information before the relevant date, did STK make any announcement prior to the relevant date which disclosed the information? If so, please provide details. If not, please explain why the Information was not released to the market at an earlier time, commenting specifically on when you believe STK was obliged to release the Information under Listing Rules 3.1 and 3.1A and what steps STK took to ensure that the Information was released promptly and without delay.
5. Please confirm that STK is complying with the Listing Rules and, in particular, Listing Rule 3.1.
6. Please confirm that STK'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 STK 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 **3:30 PM AWST Tuesday, 24 October 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, STK'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 STK 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, you should discuss with us whether it is appropriate to request a trading halt in STK's securities under Listing Rule 17.1. If you wish a trading halt, you must tell us:

- the reasons for the trading halt;

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- 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 STK's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

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

Barbara Lim
Adviser, Listings Compliance