

29 March 2023

ASX Listings Compliance (Perth)

Attention: Mr Shane Falconer by email

Dear Mr Falconer,

**Godolphin Resources Limited ('GRL'): Price - Query**

I refer to your letter dated 27 March 2023 requesting information from the Company explaining the recent trading in GRL's Shares.

The price of Godolphin Resources Limited ("Godolphin" or "the Company") (ASX: GRL) listed ordinary fully paid shares ("Shares") increased from \$0.063 at the close of trading on 24 March 2023 to \$0.085 at the close of trading on 27 March 2023. There was an increase in the volume of GRL's securities traded from 24 March 2023 to 27 March 2023.

**Request for information**

ASX asked GRL to respond separately to each of the following questions and requests for information:

1. *Is GRL 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?*

**Godolphin's Response: No**

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

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

**Godolphin's Response: Not applicable**

- (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).*

**Godolphin's Response: Not applicable**

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

**Godolphin's Response: Not applicable**

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

**Godolphin's Response:**

**Godolphin's Managing Director, Ms Jeneta Owens, provided a commentary at the weekend on the importance of the Company's Narraburra REE Project, including the commencement of test**

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work as recently announced to the market<sup>1</sup>. A copy of her comments are available on Stockhead's web-site.

The commentary published on the Stockhead website covered the recent work done at Narraburra and the opportunities for Australian critical mineral projects, all of which has been announced to the market, may, together with the expectation of updates to the project and increasing investor awareness of the opportunities for critical mineral projects located in Australia be a cause for the recent trading in Godolphin's securities.

3. *Please confirm that GRL is complying with the Listing Rules and, in particular, Listing Rule 3.1.*

**Godolphin's Response: It is confirmed that GRL is complying with the Listing Rules including Listing Rule 3.1**

4. *Please confirm that GRL'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 GRL with delegated authority from the board to respond to ASX on disclosure matters.*

**Godolphin's Response: It is confirmed that GRL's responses to the questions above have been authorised and approved by an officer of GRL with delegated authority from the board to respond to ASX on disclosure matters.**

**Ian Morgan**

Company Secretary

Copy: [ListingsCompliancePerth@asx.com.au](mailto:ListingsCompliancePerth@asx.com.au).

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<sup>1</sup> ASX: GRL announcement dated 14 February 2023 titled "Metallurgical Testing Underway for Narraburra REE Project".



27 March 2023

Reference: 71396

Mr Ian Morgan  
Company Secretary  
Godolphin Resources Limited  
By email: ihm@bigpond.net.au

Dear Mr Morgan

### **Godolphin Resources Limited ('GRL'): Price - Query**

ASX refers to the following:

- A. The change in the price of GRL's securities from \$0.063 at the close of trading on 24 March 2023 to \$0.085 at the close of trading today, 27 March 2023.
- B. The significant increase in the volume of GRL's securities traded from 24 March 2023 to 27 March 2023.

### **Request for information**

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

1. Is GRL 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?

If the answer to question 1 is "yes".

- (a) Is GRL relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in GRL's securities would suggest to ASX that such information may have ceased to be confidential and therefore GRL 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?
2. If the answer to question 1 is "no", is there any other explanation that GRL may have for the recent trading in its securities?
  3. Please confirm that GRL is complying with the Listing Rules and, in particular, Listing Rule 3.1.
  4. Please confirm that GRL'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 GRL 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 **5PM AWST Monday, 27 March 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

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within the exceptions mentioned in Listing Rule 3.1A, GRL'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 GRL 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 GRL'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 GRL's securities under Listing Rule 17.3.

### **Listing Rules 3.1 and 3.1A**

In responding to this letter, you should have regard to GRL'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 GRL'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 a copy 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.

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Kind regards

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**Shane Falconer**  
Adviser, Listings Compliance