



3 June 2024

Sam Dorland  
Australia Securities Exchange  
Central Park, 152-158 St Georges terrace  
Perth WA 6000

*By email: [sam.dorland@asx.com.au](mailto:sam.dorland@asx.com.au)*

Dear Sam,

**Response to Price Query**

In response to your correspondence dated 3 June 2024 regarding an increase in the Sovereign Metals Limited's (**Company** or **Sovereign**) share price and in the volume of trading securities, the Company's response is as follows:

1. No, the Company is not aware of any information that has not been announced which, if known, could be an explanation for recent trading in the securities of the Company.
2. Not applicable.
3. Sovereign notes recent Company announcements regarding developments at the Kasiya Rutile Project in Malawi (**Kasiya**) including:
  - (a) Commencement of pilot mining and land rehabilitation program at Kasiya as part of the ongoing optimisation study (refer to ASX announcement dated 22 May 2024);
  - (b) Downstream testwork at Kasiya has demonstrated high quality graphite for lithium-ion batteries (refer to ASX announcement dated 15 May 2024);
  - (c) Graphite circuit feed prepared at the Company's Lilongwe laboratory facility produced high quality graphite concentrates for us in pilot-scale flotation and cleaning (refer to ASX announcement dated 8 May 2024); and
  - (d) The increase of graphite bulk sample scale for Kasiya with the installation of an industrial scale spiral concentrator at the Company's Lilongwe laboratory facility (refer to ASX announcement dated 1 May 2024).
4. The Company confirms that it is in compliance with the listing rules, in particular, Listing Rule 3.1.
5. The Company confirms that its 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 the Company with delegated authority from the board to respond to ASX on disclosure matters.

Yours faithfully

*[sent electronically without signature]*

**Dylan Browne**  
Company Secretary



3 June 2024

Reference: 95333

Mr Dylan Browne  
Company Secretary  
Sovereign Metals Limited

By email

Dear Mr Browne

### **Sovereign Metals Limited ('SVM'): Price - Query**

ASX refers to the following:

- A. The change in the price of SVM's securities from a low of \$0.585 on 31 May 2024 to a high of \$0.70 today.
- B. The significant increase in the volume of SVM's securities traded from 31 May 2024 to 3 June 2024.

### **Request for information**

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

1. Is SVM 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 SVM relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in SVM's securities would suggest to ASX that such information may have ceased to be confidential and therefore SVM 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 SVM may have for the recent trading in its securities?
4. Please confirm that SVM is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that SVM'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 SVM 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 **11:30 AM AWST Monday, 3 June 2024**. 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, SVM's obligation is to disclose the information

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'immediately'. This may require the information to be disclosed before the deadline set out in the previous paragraph and may require SVM 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 SVM'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 SVM's securities under Listing Rule 17.3.

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

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

Kind regards

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ASX Compliance