



3 February 2025

Raj Logarajah  
Principal Adviser, Listings Compliance  
ASX  
Level 40, Central Park,  
152-158 St Georges Terrace,  
Perth WA 6000  
By email: [ListingsCompliancePerth@asx.com.au](mailto:ListingsCompliancePerth@asx.com.au)

Dear Mr Logarajah

**Catalina Resources Ltd ('CTN'): Cleansing Notice Timing**

I refer to your letter dated 31 January 2025 with "Request for Information" seeking responses to questions from CTN in relation to :

- CTN's announcement entitled 'Cleansing Notice' released on the ASX Market Announcements Platform ('MAP') at 10:51 AM AEDT on 29 January 2025 (the 'Cleansing Notice'), and
- CTN's announcement titled "Gold assays received from diamond drilling at Rock Lodge" (the 'Announcement') released on MAP at 8:15 PM AEDT on 30 January 2025

Please see below responses to each of your questions as following:

1. Does CTN consider the information disclosed in the Announcement and in particular, the New Results, or any part thereof to be information that investors and their professional advisers would reasonably require for the purpose of making an informed assessment of either:
  - 1.1. the assets and liabilities, financial position and performance, profits and losses and prospects of CTN;  
or
  - 1.2. the rights and liabilities attaching to the relevant securities?

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

Whilst CTN acknowledges that information of the type set out in the Announcement may have potential to be material, in the present circumstances, the results were not material on a stand alone basis. CTN has several exploration projects (Laverton Project, Central Yilgarn - Yerilgee and Evanston Projects, Lachlan Fold Belt Project, Kookynie West Project) and one mining operation (Nelson Bay Iron Project).

These exploration projects have numerous camp scale prospects exceeding 10 (including Rocklodge prospect and Bobundara Gold prospect at Lachlan Fold Belt project, T6, T8, T11 Gold Camps at Yerilgee Project, T1 and T2 Gold Camps at Evanston Project, Lily Pond South Prospect, point source magnetic anomalies and Burtville-Karridale mine corridor North Prospect at Laverton Project, Golden Chimney prospect at West Kookynie Project (under conditional sale agreement with Kobold)).

The Announcement related only to a small drilling campaign of only 2 diamond drill holes for 351 metres to follow up historical drilling of 21 drill holes for 1,443 metres (including 15 RC drill holes for 886 metres by CTN & 6 RC drill holes for 557 metres by Alt Resources Ltd) previously announced to ASX (29 November 2024).

The announcement reported only preliminary assay results from these 2 drill holes. As noted in the Announcement, "Multi element assays (Cu, Pb, Zn, Bi, Ag, As) are yet to be received from SGS Laboratory and are expected within a few weeks. Upon receipt of these assays, Catalina will assess the results and assays along with results from all past drilling to decide further exploration plans."

3. Does CTN consider the Announcement to include information which it is reasonable for investors and their professional advisers to expect to find in a disclosure document?

The information, had CTN been preparing a full form prospectus under section 710 of the *Corporations Act 2001* (Cth), would have been included in exploration data, along with all other data in the possession of CTN at the time, but would not have warranted specific disclosure.

4. If the answer to question 3 is "no", please advise the basis for that view.

Refer to the answer to question 3 above.

5. If the answer to question 3 is "yes", please detail the information.

N/A

6. If the answer to either limb in question 1 is "yes", when did CTN first become aware of the New Results, or any part thereof? In answering this question, please specify the date and time when CTN first became aware of the New Results, or any part thereof.

N/A

7. If CTN first became aware of the New Results, or any part thereof before lodging the Cleansing Notice on MAP, was CTN relying on the provisions of Listing Rule 3.1A not to release the information before CTN lodged the Announcement on MAP?

The preliminary assay results were received by CTN on 28<sup>th</sup> January 2025 (email of 27<sup>th</sup> January 2025 from SGS laboratory which was read on 28<sup>th</sup> January 2025), and an announcement was drafted and circulated for approval by 29 January 2025. If the results had been material, then a trading halt would have been

entered into while an announcement was prepared. However, given the results were not considered material, no trading halt was considered to be required.

CTN undertakes a rigorous quality control review of all raw assay data to ensure accuracy, incorporating the data into our geological database, analysing and interpreting the data. Once finalised, the associated Announcement goes through an appropriate internal review and approval process.

CTN believes this preparation and review process is essential in ensuring that the information is definite and accurate before release to avoid any potential erroneous information provided to investors. Therefore, the timing of any announcement of exploration results will follow this rigorous process and be released at the earliest possible appropriate time following review and approval to ensure compliance with Listing Rule 3.1A.1.

8. [If CTN first became aware of the New Results, or any part thereof prior to the lodging of the Cleansing Notice on MAP, please explain why the information was not set out in the Cleansing Notice pursuant to the Act?](#)

As enumerated in answer to question 7, CTN undertakes a rigorous quality control review of all raw assay data to ensure accuracy, incorporating the data into our geological database, analysing and interpreting the data. Once finalised, the associated Announcement goes through an appropriate internal review and approval process.

CTN believes this preparation and review process is essential in ensuring that the information is definite and accurate before release to avoid any potential erroneous information provided to investors. Therefore, the timing of any announcement of exploration results will follow this rigorous process and be released at the earliest possible appropriate time following review and approval to ensure compliance with Listing Rule 3.1A.1.

9. [Please confirm that CTN is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.](#)

CTN confirms that it is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.

10. [Please confirm that CTN'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 CTN with delegated authority from the board to respond to ASX on disclosure matters.](#)

CTN confirms that the above responses have been authorised and approved by the Board.

#### **Replacement of cleansing notice**

We note that the Company has subsequently found a typographical error in its cleansing notice released on 29 January 2025. That cleansing notice refers to complying with "Section 674 of the Act", when it should refer to section 674A of the Corporations Act. The Company has now withdrawn the previous cleansing notice and issued the replacement cleansing notice in its place to correct that defect. The Company can confirm that the shares the subject of the original cleansing notice have not been traded since the original cleansing notice was issued given they are subject to a 12 month voluntary escrow period.



Yours sincerely,

A handwritten signature in black ink, appearing to read "Sanjay Loyalka".

Sanjay Loyalka

Company Secretary



31 January 2025

Reference: ODIN105730

Mr Sanjay Loyalka  
Company secretary  
Catalina Resources Ltd  
Unit 38, 18 Stirling Highway  
Nedlands, Western Australia 6009

By email: Sanjay.loyalka@catalinaresources.com.au

Dear Mr Loyalka

**Catalina Resources Ltd ('CTN'): Cleansing Notice Timing**

ASX refers to the following:

- A. CTN's announcement entitled 'Cleansing Notice' released on the ASX Market Announcements Platform ('MAP') at 10:51 AM AEDT on 29 January 2025 (the 'Cleansing Notice'), disclosing amongst other things:

"[...]

- d) *As at the date of this notice, Catalina has complied with the provisions of Chapter 2M as they apply to Catalina and Section 674 of the Act; and*
- e) *As at the date of this notice, there is no information that is 'excluded information' within the meaning of Section 708A(7) and 708A(8) of the Act which is required to be disclosed by Catalina under Section 708A(6)(e) of the Act."*

- B. CTN's announcement titled "Gold assays received from diamond drilling at Rock Lodge" (the 'Announcement') released on MAP at 8:15 PM AEDT on 30 January 2025 disclosing the following:

1.1 that gold assay results from the recently completed diamond drilling at the Rock Lodge Project in the Lachlan Fold Belt, NSW have been received by CTN (the 'New Results'); and

1.2 the New Results include:

1.2.1 11m @ 0.88 g/t Au from 193m, including 1m @ 5.25 g/t Au in SRLRCD001;

1.2.2 1m @ 1.87 g/t Au from 228m in SRLRCD001; and

1.2.3 1m @ 1.4 g/t Au from 177m in SRLRCD001.

- C. Section 708A(7) of the Corporations Act 2001 (Cth) (the 'Act') which states:

*'For the purposes of subsection (6), excluded information is information:*

- (a) that has been excluded from a continuous disclosure notice in accordance with the listing rules of the relevant market operator to whom that notice is required to be given; and*
- (b) that investors and their professional advisers would reasonably require for the purpose of making an informed assessment of:*
  - (i) the assets and liabilities, financial position and performance, profits and losses and prospects of the body; or*
  - (ii) the rights and liabilities attaching to the relevant securities.'*

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D. The definition of 'aware' in Chapter 19 of the Listing Rules. This definition 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.'*

Additionally, you should refer to 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 5 situations 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.'*

### **Request for information**

Having regard to the above, ASX asks CTN to respond separately to each of the following questions.

1. Does CTN consider the information disclosed in the Announcement and in particular, the New Results, or any part thereof to be information that investors and their professional advisers would reasonably require for the purpose of making an informed assessment of either:
  - 1.1 the assets and liabilities, financial position and performance, profits and losses and prospects of CTN; or
  - 1.2 the rights and liabilities attaching to the relevant securities?
2. If the answer to either limb of question 1 is "no", please advise the basis for that view.
3. Does CTN consider the Announcement to include information which it is reasonable for investors and their professional advisers to expect to find in a disclosure document?
4. If the answer to question 3 is "no", please advise the basis for that view.
5. If the answer to question 3 is "yes", please detail the information.
6. If the answer to either limb in question 1 is "yes", when did CTN first become aware of the New Results, or any part thereof? In answering this question, please specify the date and time when CTN first became aware of the New Results, or any part thereof.

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7. If CTN first became aware of the New Results, or any part thereof before lodging the Cleansing Notice on MAP, was CTN relying on the provisions of Listing Rule 3.1A not to release the information before CTN lodged the Announcement on MAP?
  8. If CTN first became aware of the New Results, or any part thereof prior to the lodging of the Cleansing Notice on MAP, please explain why the information was not set out in the Cleansing Notice pursuant to the Act?
  9. Please confirm that CTN is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.
  10. Please confirm that CTN'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 CTN 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 Wednesday, 5 February 2025**.

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, CTN's obligation is to disclose the information 'immediately'. This may require the information to be disclosed before the deadline set out above and may require CTN to request a trading halt immediately if trading in CTN's securities is not already halted or suspended.

Your response should be sent by e-mail to **ListingsCompliancePerth@asx.com.au**. It should not be sent directly to the ASX Market Announcements Office. This is to allow us 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.

#### **Suspension**

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

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

In responding to this letter, you should have regard to CTN'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 CTN'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 all or any part of this letter, your reply and any other related correspondence between us to the market under Listing Rule 18.7A. The usual course is for the correspondence to be released to the market.

Yours sincerely

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ASX Compliance