

9 December 2025

ASX Compliance  
Level 40, Central Park  
152-158 St Georges Terrace  
PERTH WA 6000

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

Dear Sir / Madam

### Osmond Resources Limited ('OSM'): Cleansing Notice Timing

Osmond Resources Limited (ASX: OSM) (**OSM** or the **Company**) refers to ASX's letter dated 5 December 2025 (**Letter**) and responds as follows, using capitalised terms as defined in the Letter.

1. Refer to the responses below.
  - 1.1 Yes, OSM considers the Quartzite Intersection to be information that investors and their professional advisors would reasonably require for the purpose of making an informed assessment of either the assets and liabilities, financial position and performance, profits and losses and prospects of OSM (**Material Information**).
  - 1.2 Yes, OSM considers the Geological Information to be Material Information.
2. Not applicable.
3. Yes, the Company considers the Announcement to include Material Information for which it is reasonable for investors and their professional advisers to expect to find in a disclosure document.
4. Not applicable.
5. The information in the Announcement for which it is reasonable for investors and their professional advisers to expect to find in a disclosure document is Material Information for the reasons set out below:
  - 5.1 The three drill holes suggest the geological interpretation that the deposit is a pervasive tidal sand bed-type deposit (placer) with various layers enriched in heavy minerals is correct. Drill-hole NWOR-03 is particularly important as this drill hole is ~9.5kms from AV-01.
  - 5.2 The distance between drill holes AV-01 and NWOR-03 as noted above, suggests the deposit has the potential for globally significant scale of heavy minerals including high-value rutile, zircon and monazite.
6. The Company notes that the Announcement relates to the Orión EU Critical Minerals Project (**Project**) which is located in Jaén Province, Andalucía, Southern Spain, which operates on Central European Time (**CET**).

CET is 10 hours behind Australian Eastern Daylight Time (**AEDT**). Given this time difference, drilling and geophysical activities at the Project normally commence at 6pm AEDT (8am CET) and concludes around 4am AEDT (6pm CET).

The Company notes the following announcements released to the market prior to the Announcement which demonstrate that the market was well informed that drilling and geophysical studies were underway:

Date and time	Title	Relevant Extracts
15 October 2025 at 8.34am AEDT	Multiple Prospective Layers Logged in First Drill Hole	<p><b>Drilling update</b></p> <ul style="list-style-type: none"> <li>A second drill rig has arrived on site and is expected to commence drilling on Wednesday 15 October 2025. An additional drill hole (AV-01bis) has commenced on the same drill pad as AV-01 but at a different angle. This drill hole is designed to test the continuity of the geology observed in AV-01.</li> <li>The second drill rig has moved to a location 1.7km WSW of AV-01 and is expected to commence drilling shortly (SOR-02 in Figure 1). SOR-02 is designed to further test the continuity of the prospective stratigraphy in the southern reaches of the Project.</li> <li>...</li> <li>Further planned work included geological mapping, rock chip sampling, channel sampling, geophysical studies (magnetics), diamond drilling, metallurgical studies, product marketing and scoping studies.</li> </ul>
30 October 2025 at 9.46am AEDT	Cleansing Notice	<ul style="list-style-type: none"> <li>As at the date of this notice, the Company has complied with: <ul style="list-style-type: none"> <li>the provisions of Chapter 2M of the Corporations Act, as they apply to the Company; and</li> <li>sections 674 and 674A of the Corporation Act.</li> </ul> </li> <li>As at the date of this notice, there is no 'excluded information' (within the meaning of sections 708A(7) and 708A(8) of the Corporations Act) required to be disclosed under section 708A(6)(e) of the Corporations Act.</li> </ul>
30 October 2025 at 9.57am AEDT	Quarterly Activities and Cashflow Report	<p><b>Geological logging of AV-01</b></p> <ul style="list-style-type: none"> <li>Detailed logging of the first drill hole AV-01 has been completed along with down hole gamma ray geophysical logging. Logging has identified seven individual layers within the Middle Member of the Pochico Formation consisting of weakly laminated quartzite-slate lithologies (Table 2).</li> <li>These layers are separated by strongly laminated slates with minor quartzite interbeds. Drilling terminated at 187.8m depth in massive quartzite units correlated with the Lower Member of the Pochico Formation.</li> <li>...</li> <li>This drill rig is now completing NWOR-03 which is over 9.5kms NW from AV-01 (refer Figure 2 for location).</li> <li>A second drill rig arrived on site and commenced drilling on Wednesday 15 October 2025. This rig is completing SOR-02 that is 1.7km WSW of AV-01.</li> </ul>

At 6.00am AEDT (8.00pm CET) on 31 October 2025, the Company's Competent Person sent the following message to Executive Directors, Anthony Hall and Lachlan Rutherford (the **Message**):

*"NWOR-03 finished the geophysics. They found 2 anomalies, one of them with good signal."*

The “*anomalies*” refer to the targeted prospective layers within the prospective geology (Quartzite intersection). Accordingly, the Company became aware of the Quartzite Intersection and the Geological Information at 6.00am AEDT on 31 October 2025 (being after the Cleansing Notice was released at 9.46am AEDT on 30 October 2025).

As with any prudent mineral exploration company, the Company’s practice is to regularly collate exploration information. However, prior to receiving the Message at 6.00am AEDT, the information that the Company had collated was not material. The Company considered that the Message contained Material Information relating to NWOR-03 and the completion of the geophysics, and it was resolved at that time to provide that Material Information to the market in the form of the Announcement.

Given the time difference noted above, the Company ensures it is in a position to move quickly and disclose Material Information in the event such information is received overnight from Spain.

7. Not applicable.
8. Not applicable.
9. The Company confirms that it is in compliance with the Listing Rules and, in particular, Listing Rule 3.1
10. The Company confirms that the above responses have been authorised and approved in accordance with its published Continuous Disclosure Policy and by the Company's Board of Directors.

Yours faithfully

A handwritten signature in black ink, appearing to read "Ad. Wing", with a horizontal line drawn underneath.

Adrien Wing  
Company Secretary

5 December 2025

Mr Adrien Wing  
Company Secretary  
Osmond Resources Limited

By email

Dear Mr Wing

### Osmond Resources Limited ('OSM'): Cleansing Notice Timing

ASX refers to the following:

- A. OSM's announcement entitled 'Cleansing Notice' released on the ASX Market Announcements Platform ('MAP') at 9:46 AM AEDT on 30 October 2025 (the 'Cleansing Notice'), disclosing, amongst other things, the following:

*"...(c) As at the date of this notice, the Company has complied with:*

- the provisions of Chapter 2M of the Corporations Act, as they apply to the Company; and*
- sections 674 and 674A of the Corporation Act.*

*(d) As at the date of this notice, there is no 'excluded information' (within the meaning of sections 708A(7) and 708A(8) of the Corporations Act) required to be disclosed under section 708A(6)(e) of the Corporations Act."*

- B. OSM's announcement titled "Step-Out Drilling Intersects Prosepective Geology" (the 'Announcement') released on MAP at 8:39 AM AEDT on 31 October 2025 marked 'price sensitive' disclosing, amongst other things, the following:

1.1 The prospective Pochico Formation quartzites have been intersected in three additional drill holes, AV-01bis, SOR-02 and NWOR-03 ('Quartzite Intersection').

1.2 The following geological information ('Geological Information'):

**Table 2 - Geological information from drill holes AV-01bis and SOR-02.**

Drill hole	Layer	Stratigraphy	Lithology	Depth from (m)	Depth to (m)	Down hole thickness (m)
AV-01bis	Main	Pochico Fm – Middle Member	Quartzite	104.85	108.75	3.90
SOR-02	tba	Pochico Fm – Middle Member	Quartzite	373.40	375.30	1.90
	tba	Pochico Fm – Middle Member	Quartzite	385.90	388.60	2.70
NWOR-03	tba	Pochico Fm – Middle Member	Quartzite	132.60	135.90	3.30

*True thickness estimated to be ~100% of down hole thickness.*

- 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.'*

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 OSM to respond separately to each of the following questions.

1. Does OSM consider the information disclosed in the Announcement and in particular,

1.1 the Quartzite Intersection;

1.2 the Geological Information,

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:

1.3 the assets and liabilities, financial position and performance, profits and losses and prospects of OSM;  
or

1.4 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. Please comment specifically on the fact that the Announcement was marked as price sensitive.

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

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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 OSM first become aware of the relevant information in the Announcement? In answering this question, please specify the date and time when OSM first became aware of the relevant information, and in particular,
    - 6.1 the Quartzite Intersection;
    - 6.2 The Geological Information,or any part thereof.
  7. If OSM first became aware of the relevant information before lodging the Cleansing Notice on MAP, was OSM relying on the provisions of Listing Rule 3.1A not to release the information before OSM lodged the Announcement on MAP?
  8. If OSM first became aware of the information 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 OSM is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.
  10. Please confirm that OSM’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 OSM 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 **4:30 PM AWST Wednesday, 10 December 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, OSM’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 OSM to request a trading halt immediately if trading in OSM’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 OSM’s securities under Listing Rule 17.3.

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

In responding to this letter, you should have regard to OSM’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 OSM’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.

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**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