

12 December 2025

**ASX Compliance**

By email: [ListingsComplianceMelbourne@asx.com.au](mailto:ListingsComplianceMelbourne@asx.com.au) and [dale.wang@asx.com.au](mailto:dale.wang@asx.com.au)

**Metal Bank Limited – Price Query**

We refer to your letter dated 12 December 2025 in which ASX notes a change in the price of the securities of Metal Bank Limited (ASX:MBK) (**MBK**) from a low of \$0.020 to a high of \$0.029 today, together with a significant increase in the volume of the Company's securities traded from 11 December 2025 to today.

The Company provides the following responses to ASX's queries:

- 1. Is MBK 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?**

MBK has previously announced to the market that it is in the process of finalising a maiden Mineral Resource Estimate (**MRE**) for the Seven Leaders prospect at the Whiteheads Project, which MBK has recently acquired from Hastings Technology Metals Limited (**HAS**). As the upcoming MRE for the Seven Leaders prospect has been well publicised in the market for some time, MBK does not believe the share market activity today is a result of this matter.

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

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

Yes, MBK is in the process of finalising the MRE for the Seven Leaders prospect and an announcement in this regard, which at this stage is confidential and incomplete, and subject to competent person sign off and Board review and approval.

- (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).**

As noted, the MRE and an announcement in this regard is in the process of being finalised and cannot be announced immediately.

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

An announcement is expected to be released prior to market opening on Monday, 15 December 2025.

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**3. If the answer to question 1 is “no”, is there any other explanation that MBK may have for the recent trading in its securities?**

MBK’s acquisition of the gold assets of Hastings completed on 5 December 2025. MBK announced it has applied for a mining lease over the Homestead and Winja deposits at its Livingstone Project on 10 December 2025. In addition, the in-specie distribution of the HAS consideration shares issued to HAS shareholders was completed yesterday. All of these matters may have contributed to the share market activity today.

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

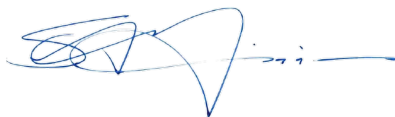
MBK is in compliance with the ASX Listing Rules and, in particular, Listing Rule 3.1.

**5. Please confirm that MBK’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 MBK with delegated authority from the board to respond to ASX on disclosure matters.**

MBK’s responses to the questions above have been authorised and approved by the Board.

**Authorised for release by the MBK Board.**

Yours faithfully,



**Sue-Ann Higgins**  
**Executive Director and Company Secretary**

12 December 2025

Ms Sue-Ann Higgins  
Executive Director & Company Secretary  
Metal Bank Limited  
Suite 506, Level 5, 50 Clarence Street  
Sydney NSW 2000

By email: sue-ann@metalbank.com.au

Dear Ms Higgins

**Metal Bank Limited ('MBK'): Price - Query**

ASX refers to the following:

- A. The change in the price of MBK's securities from a low of \$0.020 to a high of \$0.029 today.
- B. The significant increase in the volume of MBK's securities traded from 11 December 2025 to today.

**Request for information**

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

1. Is MBK 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 MBK relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in MBK's securities would suggest to ASX that such information may have ceased to be confidential and therefore MBK 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 MBK may have for the recent trading in its securities?
4. Please confirm that MBK is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that MBK'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 MBK 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 **5 PM AEDT Friday, 12 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

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within the exceptions mentioned in Listing Rule 3.1A, MBK'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 MBK to request a trading halt immediately.

Your response should be sent to me by e-mail at **ListingsComplianceMelbourne@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 MBK'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 MBK's securities under Listing Rule 17.3.

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

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