

24 March 2022

Ms Yushra Haniff
Compliance Advisor, Listings Compliance
ASX Compliance Pty Ltd
20 Bridge Street,
Sydney NSW 2000

By email: ListingsComplianceSydney@asx.com.au

Dear Ms Haniff

Query Letter

We refer to your enquiry letter dated 16 March 2022 and our responses are noted below.

1 *ASX observes that the progress made under the development program described in paragraph A appears to have largely been lost and PGM had to abandon its plans to seek intellectual property protection. Does PGM consider the loss of the progress made under the development program to be material to PGM?*

NO.

2 *If the answer to question 1 is “yes”, please identify the specific announcement(s) on MAP disclosing this. If no announcement was made, please provide the basis for PGM’s view that the decision not to disclose this information was compliant with Listing Rule 3.1.*

N/A

3 *If the answer to question 1 is “no”, please explain the basis for this view, commenting specifically on why PGM appears to consider the commencement of these development programs to be material, but not the loss of materials and output from the program.*

The rationale for developing a new process was to create alternative, value-added products from scandium oxide or other intermediate products from the PSP. This strategy would enable the PSP to move downstream in the scandium business, capturing value that would otherwise accrue to third parties, thus lowering PSP’s overall cost structure.

The PSP Definitive Feasibility Study completed in 2018 was based on refined scandium oxide production alone. It was becoming clear through discussions with potential offtake partners that value-adding into aluminium scandium master alloy would be beneficial to enable the project to achieve market entry at significant scale into the global scandium business. In summary, the successful creation of a master alloy was a material step forward in creating a new potential revenue stream and leveraging the downstream value captured through producing a master alloy.

Despite the fact that Nigel Ricketts had passed away, Platina still had a final metallurgical report that detailed the process used to create the master alloy and also had samples of final master alloy materials.

Going for gold.

Platina Resources Limited | ABN 25 119 007 939 | ASX: PGM

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- 4 *ASX observes that the Announcement (paragraph B) makes no reference to formalising, or commencing to formalise, intellectual property protection, is PGM of the view that the information contained in the Announcement is information material enough to be given to ASX under Listing Rule 3.1.?*

Whilst the announcement doesn't detail any plans for intellectual property protection, it does highlight that a potentially patentable manufacturing process for producing aluminium-scandium master alloy has been developed. This is a material step forward for implementing the strategy outlined in the ASX release, "New Initiatives to Advance the Scandium Project", 6th September 2021. The headline did state it was a "Positive Step Towards Creating Valuable IP for Aluminium-Scandium Master Alloy production". Platina decided to defer the intellectual property application process until further larger scale tests were completed to confirm that the manufacturing process was robust and to expand the possible scope of the intellectual property.

- 5 *Do the developments referred to in the Announcement currently:*

5.1 confer PGM with any enforceable and exclusive rights?

5.2 have any material impact on any material agreements between PGM and any third parties?

5.3 represent an asset that is reflected on PGM's balance sheet? If so, please provide details.

No to all the three questions.

- 6 *Is the program described in the Announcement distinct from PGM's initiative with Swinburne University of Technology (as described in paragraph C)? If so, please provide further details on any differences and PGM's entitlement to any intellectual property developed from the Swinburne University of Technology initiative.*

The program at Swinburne University of Technology is a fundamental study of the reaction mechanisms between Al and Mg metal with rare earth element oxides, including scandium oxide. This study is aimed at understanding the science underlying the process that Platina has identified working with Grandfield Technology to produce aluminium-scandium master alloy, as described in the release dated 6th September 2021. Platina would be entitled to any intellectual property developed, under the terms of the agreement between Swinburne and the other parties.

Platina is therefore continuing the process development of novel technology for the manufacture of aluminium-scandium master alloy after the break from mid 2019 to late 2021 described in our previous letter dated 4th March 2022.

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

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

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

The Company confirms that the responses to the questions above have been authorised and approved by the Board.

Yours sincerely

Paul Jurman
Company Secretary



16 March 2022

Reference: 48067

Mr Paul Jurman
Company Secretary
Platina Resources Limited
Suite 9, Level 2, 389 Oxford St
Mount Hawthorn, WA 6016

By email: jurmanp@crcpl.com.au

Dear Mr Jurman

Platina Resources ('PGM'): Query Letter

ASX refers to the following:

- A. PGM's announcement titled "Master Alloy Development Program Successfully Completed" released on the ASX Market Announcements Platform ('MAP') on 17 December 2018, which disclosed (relevantly, emphasis added) that:

"Test work has been under way since August 2018 to develop proprietary master alloy production procedures. Conversion of the scandium oxide produced from mining and processing operations into aluminium scandium master alloy is a critical, value-adding part of the supply chain in manufacturing aluminium scandium alloys for end-users.

The test work on master alloy production has been conducted at relatively small scale and has focussed on producing master alloy from scandium oxide, but also from intermediate products from the PSP flowsheet developed for the recently completed Definitive Feasibility Study ("DFS").

The small scale work has concluded and it has been demonstrated that the procedure developed as part of the test work program can reliably produce 2% scandium-aluminium master alloy from either scandium oxide or from intermediate products in the flowsheet developed in the DFS test work program. Further details are unable to be released at this time whilst Platina examines options for intellectual property protection for the processes developed."

- B. PGM's announcement titled "Positive Step Towards Creating Valuable IP for Aluminium – Scandium Master Alloy Production" (the 'Announcement') released on MAP on 16 February 2022, which disclosed (relevantly, emphasis added) that:

"[PGM] intellectual property development program has produced a new high-grade, aluminium-scandium master alloy that it believes will be attractive to end users...

The aim of the program is to develop a proprietary process for the production of value-added, aluminium-scandium master alloy. The tests have demonstrated the successful conversion of scandium oxide into scandium aluminide with high recoveries, producing micro-structures that are the same as commercially available aluminium scandium master alloys (see Figure 1). The high-grade master alloy has also successfully been diluted back down to a standard commercial grade of 2% scandium.

- C. PGM's Quarterly Activities Report for the period ending 31 December 2021 and released on MAP on 31 January 2022, which disclosed that:

"During the quarter, Platina commenced a number of initiatives to unlock the value in the PSP including: A master alloy production and intellectual property development program at Swinburne University..."

D. PGM's response to ASX's letter dated 4 March 2022, which was not published on MAP. In this response, PGM stated (relevantly):

i. *"In 2018, PGM engaged Altrius Engineering Services ("Altrius") to create a process methodology for converting high-purity scandium oxide or scandium hydroxide produced from the Platina Scandium Project ("PSP") into master alloy for the manufacture of aluminium-scandium (AlSc) alloys. Altrius was solely owned and operated by Nigel Ricketts who was regarded as one of world's preeminent scandium metallurgists."*

ii. *"However, Nigel Ricketts tragically suffered a fatal heart attack in mid-2019 and Platina was unable to recover its samples or any additional notes relating to the test work or proposed intellectual property protection.*

As a result of losing Altrius as a technical partner, capital constraints and Covid-19 restrictions, the master alloy development program was put on hold."

iii. *"In mid-2021, major global mining companies Rio Tinto and Rusal, who have major global aluminium business units, each announced plans to enter into the scandium market focused on AlSc alloy development. Based on this renewed interest in scandium, Platina commissioned CM Group to undertake a scandium market study to explore for market opportunities and potential industry players that could be aligned with the PSP."*

iv. *"In parallel to this program, Platina joined a consortium in a PhD project at Swinburne University of Technology ("SUT") investigating the fundamental processes of reduction of rare earth elements, including scandium, in metal alloy reactions in 2021. This project has just commenced and will be the subject of academic publications during its 3-year timeframe. It is expected that this research will clarify mechanisms underlying the process to create AlSc master alloys."*

E. Listing Rule 3.1, which requires a listed entity to immediately give ASX any information concerning it that a reasonable person would expect to have a material effect on the price or value of the entity's securities.

F. Section 4.15 of Guidance Note 8, which states that:

"Wherever possible, an announcement under Listing Rule 3.1 should contain sufficient detail for investors or their professional advisers to understand its ramifications and to assess its impact on the price or value of the entity's securities."

G. Listed@ASX Compliance Update no. 11/21,¹ which provides further guidance on the announcement of patent applications. Of particular relevance:

"If a listed entity wishes to update the market on the status of a patent application prior to its grant then it should do so in its quarterly reports or other periodic disclosure. Stand-alone announcements concerning such applications, whether marked "price-sensitive" or not, are likely to result in further action from ASX (which may include the announcement being rejected or ASX sending a query letter requiring the entity to justify why it considers it to have been appropriate to release the announcement on MAP)."

Request for information

Having regard to the above, ASX asks PGM to respond separately to each of the following questions and requests for information:

¹ <https://www2.asx.com.au/content/dam/asx/documents/listings/compliance-updates/2021/listed-compliance-update-december-2021.pdf>

1. ASX observes that the progress made under the development program described in paragraph A appears to have largely been lost and PGM had to abandon its plans to seek intellectual property protection. Does PGM consider the loss of the progress made under the development program to be material to PGM?
2. If the answer to question 1 is “yes”, please identify the specific announcement(s) on MAP disclosing this. If no announcement was made, please provide the basis for PGM’s view that the decision not to disclose this information was compliant with Listing Rule 3.1.
3. If the answer to question 1 is “no”, please explain the basis for this view, commenting specifically on why PGM appears to consider the commencement of these development programs to be material, but not the loss of materials and output from the program.
4. ASX observes that the Announcement (paragraph B) makes no reference to formalising, or commencing to formalise, intellectual property protection, is PGM of the view that the information contained in the Announcement is information material enough to be given to ASX under Listing Rule 3.1.?
5. Do the developments referred to in the Announcement currently:
 - 5.1 confer PGM with any enforceable and exclusive rights?
 - 5.2 have any material impact on any material agreements between PGM and any third parties?
 - 5.3 represent an asset that is reflected on PGM’s balance sheet? If so, please provide details.
6. Is the program described in the Announcement distinct from PGM’s initiative with Swinburne University of Technology (as described in paragraph C)? If so, please provide further details on any differences and PGM’s entitlement to any intellectual property developed from the Swinburne University of Technology initiative.
7. Please confirm that PGM is complying with the Listing Rules and, in particular, Listing Rule 3.1.
8. Please confirm that PGM’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 PGM 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 **9:30 AM AEDT Tuesday, 22 March 2022**. 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, PGM’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 PGM to request a trading halt immediately.

Your response should be sent to me by e-mail at **ListingsComplianceSydney@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, you should discuss with us whether it is appropriate to request a trading halt in PGM’s securities under Listing Rule 17.1. If you wish a trading halt, you must tell us:

- the reasons for the trading halt;

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- 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 PGM's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

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

Kind regards

Yushra Haniff
Compliance Adviser, Listings Compliance (Sydney)