

UNITED STATES SECURITIES AND EXCHANGE COMMISSION WASHINGTON, D.C. 20549

DIVISION OF CORPORATION FINANCE

July 22, 2024

Anastasios Arima Chief Executive Officer IperionX Ltd 129 W Trade Street Suite 1405 Charlotte, NC 28202

> Re: IperionX Ltd Form 20-F for the Fiscal Year ended June 30, 2023 Filed September 18, 2023 File No. 001-41338

Dear Anastasios Arima:

We have completed our review of your filing. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

Division of Corporation Finance Office of Energy & Transportation