

11 December 2025

Rhys Johnson  
Adviser, Listings Compliance

By email: ListingsCompliancePerth@asx.com.au

Dear Mr Johnson

## **Lycopodium Limited – Appendices 3Y lodged 8 December 2025**

Lycopodium Limited (ASX: LYL) (**the Company**) refer to ASX's letter dated 10 December 2025 regarding Appendices 3Y for Mr Karl Cicanese, Mr Peter De Leo and Mr Bruno Ruggiero lodged by the Company on 8 December 2025 (**ASX Letter**).

Unless otherwise defined, capitalised terms used in this letter have the meaning given to them in the ASX Letter.

In response to the questions set out in ASX's letter, the Company advises the following:

### **1. Please explain why the Appendixes 3Y were lodged late.**

The late lodgement was the result of an administrative oversight. As soon as the oversight was identified, the Appendixes 3Y were lodged on the Company's MAP.

### **2. What arrangements does the Company have in place under Listing Rule 3.19B with its directors to ensure that is able to meet its disclosure obligations under Listing Rule 3.19A?**

The Company maintains a Continuous Disclosure Policy and Securities Trading Policy (the **Policies**). The Company is in regular communication with each of its Directors about information regarding changes to their respective securities holdings and providing these changes to the Company Secretary as soon as possible. These Policies are publicly available on the Company's website.

Each of the Directors are aware of the Company's disclosure obligations under the Listing Rules, including Listing Rule 3.19A and 3.19B.

In respect of changes in Directors' interests caused by the issue of securities to a Director that have been approved by shareholders in accordance with the Listing Rules, the Company Secretary prepares the Directors' interest notices, liaises with the relevant Director to ensure the information provided is accurate and then lodges the required Appendix 3Y on the Company's MAP, in conjunction with arranging the issue of the relevant securities.

The Company Secretary is aware that these actions must occur within 5 business days of the date of the change of a Director's interest. The late lodgement of the Notices was not a result of a failure to implement the Policies, but rather, an unfortunate administrative oversight.

### **3. If the current arrangements are inadequate or not being enforced, what additional steps does the Company intend to take to ensure compliance with Listing Rule 3.19B?**

The Company considers that the current arrangements to ensure compliance with Listing Rule 3.19B described above are adequate and are enforced by the Company. The Company acknowledges that the late lodgement of the Appendixes 3Y on this occasion was an unfortunate administrative oversight, but it considers that the circumstances in which it took place are unlikely to occur again.

Your faithfully



Justine Campbell  
Company Secretary  
**Lycopodium Limited**

*The responses have been authorised by the Board of Lycopodium Limited.*

10 December 2025

Ms Justine Campbell  
Company Secretary  
Lycopodium Limited

By email

Dear Ms Campbell

### **Lycopodium Limited ('LYL'): Appendix 3Y – Change of Director's Interest Notice Query**

ASX refers to the following:

1. LYL's Appendices 3Y lodged on the ASX Market Announcements Platform ('MAP') on 8 December 2025 for:

- 1.1 Mr Karl Cicanese;
- 1.2 Mr Peter De Leo; and
- 1.3 Mr Bruno Ruggiero.

(together, the 'Notices')

2. Listing Rule 3.19A which requires an entity to tell ASX the following:

**3.19A.1** *'The notifiable interests of a director of the entity (or in the case of a trust, a director of the responsible entity of the trust) at the following times.*

- *On the date that the entity is admitted to the official list.*
- *On the date that a director is appointed.*

*The entity must complete Appendix 3X and give it to ASX no more than 5 business days after the entity's admission or a director's appointment.*

**3.19A.2** *A change to a notifiable interest of a director of the entity (or in the case of a trust, a director of the responsible entity of the trust) including whether the change occurred during a closed period where prior written clearance was required and, if so, whether prior written clearance was provided. The entity must complete Appendix 3Y and give it to ASX no more than 5 business days after the change occurs.*

**3.19A.3** *The notifiable interests of a director of the entity (or in the case of a trust, a director of the responsible entity of the trust) at the date that the director ceases to be a director. The entity must complete Appendix 3Z and give it to ASX no more than 5 business days after the director ceases to be a director.'*

3. Listing rule 3.19B which states that:

*'An entity must make such arrangements as are necessary with a director of the entity (or in the case of a trust, a director of the responsible entity of the trust) to ensure that the director discloses to the entity all the information required by the entity to give ASX completed Appendices 3X, 3Y and 3Z within the time period allowed by listing rule 3.19.A. The entity must enforce the arrangements with the director.'*

The Notices indicate that a change in Messrs Cicanese, De Leo and Ruggiero's notifiable interests occurred on 13 November 2025. It appears that the Notices should have been lodged with ASX by 20 November 2025.

---

Consequently, LYL may have breached Listing Rules 3.19A and/or 3.19B. It also appears that Messrs Cicanese, De Leo and Ruggiero may have breached section 205G of the *Corporations Act 2001* (Cth).

### Request for Information

Under Listing Rule 18.7, we ask that you answer each of the following questions having regard to Listing Rules 3.19A and 3.19B and *Guidance Note 22: Director Disclosure of Interests and Transactions in Securities - Obligations of Listed Entities*.

1. Please explain why the Appendices 3Y were lodged late.
2. What arrangements does LYL have in place under Listing Rule 3.19B with its directors to ensure that it is able to meet its disclosure obligations under Listing Rule 3.19A?
3. If the current arrangements are inadequate or not being enforced, what additional steps does LYL intend to take to ensure compliance with Listing Rule 3.19B?

### 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 Monday, 15 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, LYL'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 LYL to request a trading halt immediately.

Your response should be sent to me by e-mail at [ListingsCompliancePerth@asx.com.au](mailto:ListingsCompliancePerth@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 LYL'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 LYL's securities under Listing Rule 17.3.

---

**Listing Rules 3.1 and 3.1A**

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

Yours sincerely

---

ASX Compliance