

5<sup>th</sup> February 2026

Mr Raj Logarajah  
Adviser, Listings Compliance (Perth) ASX Compliance Pty Ltd  
Level 40, Central Park,  
152-158 St Georges Terrace  
Perth WA 6000  
By Email Only

Dear Raj,

**Price Query: First Graphene Limited (“FGR”)**

We refer to your letter of 5th February 2026 and respond as follows:

1. FGR is not aware of any information, which has not been announced to the market, which would explain the price movement;
2. Not applicable
3. FGR is not aware of any reason to explain the recent trading in its securities.
4. We confirm FGR continues to be in compliance with its obligations under the Listing Rules, and in particular Listing Rule 3.1; and
5. These responses have been authorised by an officer of FGR delegated with authority from the board to respond to ASX disclosure matters.

**Yours sincerely**

**Michael Bell**  
Managing Director and CEO  
First Graphene Limited  
michael.bell@firstgraphene.net  
+61 1300 660 448

5 February 2026

Ms Elizabeth Lee  
Company Secretary  
First Graphene Limited

By email

Dear Ms Lee

### **First Graphene Limited ('FGR'): Price and Volume Query**

ASX refers to the following:

- A. The change in the price of FGR's securities from a closing price of \$0.085 on 4 February 2026 to an intraday high of \$0.11 today.
- B. The significant increase in the volume of FGR's securities traded today, 5 February 2026.

### **Request for information**

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

1. Is FGR 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 FGR relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in FGR's securities would suggest to ASX that such information may have ceased to be confidential and therefore FGR 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 FGR may have for the recent trading in its securities?
4. Please confirm that FGR is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that FGR'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 FGR 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 **10:45 AM AWST Thursday, 5 February 2026**. 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, FGR's obligation is to disclose the

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information ‘immediately’. This may require the information to be disclosed before the deadline set out in the previous paragraph and may require FGR to request a trading halt immediately.

Your response should be sent to me by e-mail at **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, 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 FGR’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 FGR’s securities under Listing Rule 17.3.

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

In responding to this letter, you should have regard to FGR’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 FGR’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 faithfully

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ASX Compliance