

6 March 2026

ASX Compliance  
39 Martin Place  
Sydney NSW 2000

By email: ListingsComplianceSydney@asx.com.au

Dear Sir/Madam

### **Response to ASX Query – Trading During Closed Period**

We refer to your letter dated 3 March 2026 regarding trading in the Company's securities by Mr Bevan Tarratt as disclosed in the Appendix 3Y lodged with ASX on 17 February 2026. SQX Resources Limited (**the Company**) responds to ASX's questions as set out below.

#### **1. When did SQX first become aware of the trading that was notified in the Appendix 3Y?**

Mr Tarratt advised the Company via email on 11 February 2026, prior to the release of the relevant ASX announcement, that he intended to purchase SQX shares following the release of the announcement.

#### **2. Why did the Appendix 3Y state in Part 3 that no interests in SQX's securities were traded during a closed period?**

The statement in Part 3 of the Appendix 3Y was included as an error. The Company acknowledges that the trade occurred during a closed period under SQX's Trading Policy. The incorrect disclosure resulted from administrative oversight when completing the form.

#### **3. Did Mr Tarratt notify the Board in writing of their intention to trade? If not, why not?**

Yes. Mr Tarratt provided written notification to the Board of his intention to trade via email prior to undertaking the transaction.

#### **4. Did the Board provide prior written clearance to Mr Tarratt to trade during the closed period? If so, please provide a copy of the written communication. If not, why not?**

Yes. The Board provided prior written clearance for the trade via written communication from the Company Secretary.

#### **5. Did Mr Tarratt breach SQX's Trading Policy?**

Under section 4.1.b of SQX's Trading Policy:

*"The Company may at its discretion vary this rule in relation to a particular Closed Period by general announcement to all Key Management Personnel either before or during the Closed Periods. However, if a Key Management Personnel is in possession of price sensitive information which is not generally available to the market, then he or she must not deal in the Company's securities at any time it is in possession of such information."*

Mr Tarratt provided written notice of his intention to buy following the release of the announcement and received written approval to purchase following the release of the announcement.

**6. What disciplinary or remedial action is the board of SQX proposing to take in relation to the apparent breach of SQX's Trading Policy?**

The Board has formally reminded the directors of their obligations under the Company's Trading Policy and Listing Rules. The Company is reviewing its internal compliance procedures to ensure stricter adherence to clearance requirements, including enhanced training and written acknowledgement of policy obligations by directors. The Company's share trading policy is currently under review.

**7. Please explain what arrangements SQX has in place with its directors to ensure that it is able to meet its disclosure obligations under Listing Rule 3.19A.**

SQX has written agreements with each director requiring prompt notification of any change in their interests in the Company's securities. The Company Secretary is responsible for monitoring director transactions and preparing and lodging Appendix 3Y notices within the required timeframe. Directors are regularly reminded of their disclosure obligations under the Listing Rules.

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

The Company confirms that it is complying with the ASX Listing Rules and, in particular, Listing Rule 3.1. The Company maintains continuous disclosure policies and procedures designed to ensure timely identification and disclosure of material information.

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

The responses set out above have been authorised and approved by the Board of SQX (or by an officer with delegated authority from the Board) in accordance with the Company's continuous disclosure policy.

Yours faithfully

**Quinton Meyers**  
Company Secretary  
SQX Resources Limited

3 March 2026

Mr Quinton Meyers  
Company Secretary  
SQX Resources Limited  
349 Hay Street  
Subiaco WA 6008

By email

Dear Mr Meyers

### **SQX Resources Limited ('SQX'): Trading during a closed period**

ASX refers to the following:

- A. The announcement by SQX entitled 'Appendix 3Y' lodged on the ASX Market Announcements Platform ('MAP') on 17 February 2026 for Mr Bevan Tarratt (the 'Appendix 3Y'). The Appendix 3Y related to trading in SQX's securities. The Appendix 3Y stated that the trading did not occur during a closed period under SQX's trading policy.
- B. The announcement by SQX entitled 'Staking Doubles Ground Position at Bonanza Grade Williams Gold-Silver Project, Montana' lodged on MAP on 13 February 2026 (the 'Announcement').
- C. SQX's trading policy lodged on the ASX Market Announcements Platform on 16 February 2023 (the 'Trading Policy') which is also available on SQX's website and which states, among other things, the following:

*"1. Introduction*

...

*(b) Key Management Personnel are those persons having authority and responsibility for planning, directing and controlling the activities of the entity, directly or indirectly, including any Director (whether executive or otherwise) of that entity.*

*(c) The Company has determined that its Key Management Personnel are its Directors, executives and those employees directly reporting to the Managing Director."*

...

*4. Guidelines for trading in the company's securities*

*4.1 General rule*

*(a) Key Management Personnel must not, except in exceptional circumstances, deal in securities of the Company during the following periods: ...*

*(ii) the period commencing from the release of information to the ASX which a reasonable person would expect to have a material effect on either the price or the value of the Company's Securities and ending the Business Day after the release of such information to the ASX;*

*5. Approval and notification requirements*

*5.1 Approval requirements*

...

*(b) If the Chairman of the Board wishes to buy, sell or exercise rights in relation to the Company's securities, the Chairman of the Board must obtain the prior approval of the Board before doing so.*

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## 5.2 Approvals to buy or sell securities

*(a) Copies of written approvals must be forwarded to the Company Secretary prior to the approved purchase or sale transaction."*

ASX notes the following:

1. SQX's closed period commenced on 13 February 2026, the date of the Announcement, and ended on 14 February 2026, that is the Business Day after the Announcement.
2. The trading would appear to have taken place during this period. This is despite SQX stating in Part 3 of the Appendix 3Y that no interests in SQX's securities were traded during a closed period.

### Request for information

Having regard to the above, and pursuant to Listing Rule 18.7, ASX asks SQX to respond separately to each of the following questions.

1. When did SQX first become aware of the trading that was notified in the Appendix 3Y?
2. Why did the Appendix 3Y state in Part 3 that no interests in SQX's securities were traded during a closed period?
3. Did Mr Tarratt notify the Board in writing of their intention to trade? If not, why not?
4. Did the Board provide prior written clearance to Mr Tarratt to trade during the closed period? If so, please provide a copy of the written communication. If not, why not?
5. Did Mr Tarratt breach SQX's Trading Policy?
6. What disciplinary or remedial action is the board of SQX proposing to take in relation to the apparent breach of SQX's Trading Policy?
7. Please explain what arrangements SQX has in place with its directors to ensure that it is able to meet its disclosure obligations under Listing Rule 3.19A.
8. Please confirm that SQX is complying with the Listing Rules and, in particular, Listing Rule 3.1.
9. Please confirm that SQX'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 SQX 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 **9:00 AM AEDT Tuesday, 10 March 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, SQX'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 SQX to request a trading halt immediately.

Your response should be sent by e-mail to [ListingsComplianceSydney@asx.com.au](mailto:ListingsComplianceSydney@asx.com.au). It should not be sent directly to the ASX Market Announcements Office. This is to allow ASX 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.

### Suspension

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If you do not respond to this letter by the time specified above, ASX may suspend trading in SQX's securities under Listing Rule 17.3.

**Listing Rules 3.1 and 3.1A**

In responding to this letter, you should have regard to SQX'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 SQX'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. The usual course is for the correspondence to be released to the market.

Regards

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ASX Compliance