

8 April 2026

Listings Compliance (Sydney)  
ASX Limited  
**By email: [ListingsComplianceSydney@asx.com.au](mailto:ListingsComplianceSydney@asx.com.au)**

Dear Sir/Madam

**Sequoia Financial Group Limited (SEQ or the Company) – Response to ASX Letter**

We refer to your letter dated 1 April 2026 regarding compliance with listing rule 15.7.

We respond to each of your queries as follows:

**1. Did SEQ’s managing director and CEO, Garry Crole, or anyone representing SEQ, provide a statement to the Professional Planner?**

Yes

**2. If the answer to any part of question 1 is yes”:**

**2.1 please provide a copy of that correspondence (not for release to the market);**

Information was provided to the Professional Planner by a telephone conversation with a journalist late in the afternoon of 20 March 2026 and as it was a verbal discussion no correspondence is able to be provided.

**2.2 please explain when (time and date), and by whom, if not by Mr Crole, the information was provided to the media.**

Mr Garry Crole was telephoned by a journalist from the Professional Planner at approximately 2 p.m. on the afternoon of 20 March 2026 while the Company was in a trading halt. The journalist asked questions about a sale of InterPrac Financial Planning Pty Limited (“**InterPrac**”) to a third party he suggested was Avalon FP. Mr Crole advised that the Company was not negotiating with that third party, and in order to correct the journalist, named the party with whom the Company was negotiating. The journalist was advised that no agreement had been entered into by the Company, and the Company expected the trading halt to be lifted, and an announcement released to the market should an agreement be signed. Mr Crole was assured by the journalist that the information would not be published until the trading halt was lifted and any transaction announced to the market and that they would be watching for such an announcement to be released.

**Registered Office:**

Unit 7  
1-7 Castlereagh Street  
Sydney NSW 2000

**Phone:** +61 3 9209 9777

**Email:** [info@sequoia.com.au](mailto:info@sequoia.com.au)

**Website:** [www.sequoia.com.au](http://www.sequoia.com.au)

**2.3 please confirm if the release of the information was authorised and approved in accordance with SEQ's published continuous disclosure policy or otherwise by its Board; and**

No. As explained above, Mr Crole acted on the understanding that the information would not be published until after the sale agreement had been entered into by the Company and an announcement provided to the ASX Market Announcements Office.

**2.4 does SEQ consider this to be compliant with listing rule 15.7? If so, please explain the basis for that view.**

No. The Company notes that at no time between provision of the information to the journalist at the Professional Planner and the release of the announcement to the ASX concerning the Company entering into an agreement to sell InterPrac was the market trading on an uninformed basis.

**3. If the answer to question 1 is "no", is there any other explanation as to how the information appeared in the Article?**

Not applicable

**4. What arrangements does SEQ have in place to ensure compliance with Listing Rule 15.7?**

SEQ follows a continuous disclosure policy to ensure compliance with listing rule 15.7.

SEQ's officers and board are aware of the importance of keeping information confidential and responses to loss of confidentiality. The CEO and Chairman make sure that any third parties are bound by obligations of confidentiality and that employees also keep the information confidential. If the board makes an assessment that confidentiality has been lost, the need for a trading halt will be considered pending an announcement.

**5. In light of the Article, what additional steps will SEQ take to ensure compliance with Listing Rule 15.7?**

Following receipt of the ASX Letter, all Directors were provided with a copy of the ASX Letter, reviewed this response and provided input on how best to manage compliance with Listing Rule 15.7 in the future.

As a result, this matter together with a review of the Company's Continuous Disclosure Policy and its internal training on the policy (including whether any amendments and/or refresher training are required thereto) will be added as a specific agenda item at the Company's next Board meeting scheduled for 29 April 2026. The results of this discussion and steps taken to ensure compliance with listing rule 15.7 will be provided to the market immediately.

The Board notes that the regrettable non-compliance with Listing Rule 15.7 was unintentional and at a point in time when the Company's shares were in a trading halt.

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**6. Please confirm that SEQ's responses to the above have been authorised and approved in accordance with its published continuous disclosure policy or otherwise by its board or an officer of SEQ with delegated authority from the board to respond to ASX on disclosure matters.**

SEQ confirms that the responses provided in this letter have been approved in accordance with its published continuous disclosure policy and by an authorised officer of SEQ.

Yours faithfully

*Natalie Climo*

**Natalie Climo**  
**Company Secretary**  
**Sequoia Financial Group Limited**

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1 April 2026

Ms Natalie Climo  
Company Secretary  
Sequoia Financial Group Ltd  
Suite 7.01, Level 7 1 Castlereagh Street  
SYDNEY NSW 2000

By email

Dear Ms Climo

### **Sequoia Financial Group Ltd ('SEQ'): Compliance with Listing Rule 15.7**

ASX refers to the following:

- A. The article appearing in the Professional Planner titled "Sequoia set to offload InterPrac for \$50K" published online at 4:58 PM AEDT on 20 March 2026 (the 'Article'), which stated:

*Sequoia Financial Group managing director Garry Crole says he intends to sell his troubled InterPrac Financial Planning for just \$50,000 to an outfit called Conquest Investment Partners.*

*In correspondence sent after market close on Friday and seen by Professional Planner, Crole alerted external business advisers to his plan to offload InterPrac, explaining that in his view a sale would stabilise the business and avoid an asset-stripping or a wind-down scenario.*

*Crole lists the purchaser as Conquest Investment Partners, which was registered as a company with the corporate regulator in July 2024. Very little public information is available about the firm ...*

- B. SEQ's announcement titled "Sale of InterPrac Financial Planning Pty Ltd" lodged with the ASX Market Announcements Platform ('MAP') and released at 9:26 AM AEDT on 23 March 2026 in which SEQ disclosed (the 'Announcement'):

*Sequoia Financial Group Ltd ("Sequoia" or "the Company") (ASX : SEQ) advises that it has signed a Share Sale Agreement ("Sale Agreement") for the disposal of 100% of the issued share capital in InterPrac Financial Planning Pty Ltd ("InterPrac") to Conquest Investment Partners Pty Ltd (ACN 679 320 088) ("Conquest") for a total consideration of \$50,000.*

- C. Listing Rule 3.1 which states:

*Once an entity is or becomes aware of 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, the entity must immediately tell ASX that information.*

- D. Listing Rule 15.7 which states:

*An entity must not release information that is for release to the market to any person until it has given the information to ASX and has received an acknowledgment that ASX has released the information to the market.*

- E. The note to Listing Rule 15.7 which states:

*Note: This rule prohibits an entity giving information to the media even on an embargoed basis.*

As the Article was published prior to the Announcement being released on MAP and before SEQ received an acknowledgement that ASX has released the information to the market, it appears that SEQ may have breached Listing Rules 3.1 and/or 15.7.

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## Request for Information

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

1. Did SEQ's managing director and CEO, Garry Crole, or anyone representing SEQ, provide a statement to the Professional Planner?
2. If the answer to question 1 is "yes":
  - 2.1 please provide a copy of that correspondence (not for release to the market);
  - 2.2 please explain when (time and date), and by whom, if not by Mr Crole, the information was provided to the media;
  - 2.3 please confirm if the release of the information was authorised and approved in accordance with SEQ's published continuous disclosure policy or otherwise by its Board; and
  - 2.4 does SEQ consider this to be compliant with Listing Rule 15.7? If so, please explain the basis for that view.
3. If the answer to question 1 is "no", is there any other explanation as to how the information appeared in the Article?
4. What arrangements does SEQ have in place to ensure compliance with Listing Rule 15.7?
5. In light of the Article, what additional steps will SEQ take to ensure compliance with Listing Rule 15.7?
6. Please confirm SEQ's responses to the above have been authorised and approved in accordance with its published continuous disclosure policy or otherwise by its Board or an officer of SEQ with delegated authority from the Board to respond to ASX on disclosure matters.

ASX expects SEQ to make reasonable enquiries to put itself in a position to answer the questions above.

## 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 AEST on Wednesday, 8 April 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, SEQ's obligation is to disclose the information 'immediately'. This may require the information to be disclosed before the deadline set out above and may require SEQ to request a trading halt immediately if trading in SEQ's securities is not already halted or suspended.

Your response should be sent by e-mail to **ListingsComplianceSydney@asx.com.au**. It should not be sent directly to the ASX Market Announcements Office. This is to allow us 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

If you are unable to respond to this letter by the time specified above, ASX will likely suspend trading in SEQ's securities under Listing Rule 17.3.

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**Listing Rules 3.1 and 3.1A**

In responding to this letter, you should have regard to SEQ'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 SEQ'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 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