

13 April 2026

Mr Damian Dinelli
Principal Adviser, Listings Compliance
Australian Securities Exchange
Level 40, Central Park
152-158 St George's Terrace
Perth WA 6000

By email: damian.dinelli@asx.com.au; listingscomplianceperth@asx.com.au

Dear Damian,

RESPONSE TO ASX AWARE LETTER DATED 8 APRIL 2026

Surefire Resources NL (the "Company") refers to the ASX Aware Letter dated 8 April 2026 (the "Letter") and provides the following response to each of the questions raised.

The Company addresses each question in turn below.

1. *Does SRN consider the following information, or any part thereof, to be information that a reasonable person would expect to have a material effect on the price or value of its securities?*
 - 1.1 *The change of CEO position on Thursday, 19 March 2026, being the effective date of Dr Whitehead's resignation as CEO of SRN.*

The Company acknowledges that a change of CEO position is information that a reasonable person could possibly expect to have a material effect on the price or value of the Company's securities, having regard in particular to:

- the Company's obligations under Listing Rule 3.16.1, which requires immediate notification of a change of CEO; and
- the market-sensitive classification applied to the announcement of Dr Whitehead's appointment on 23 February 2026.

The Company notes, however, that context is relevant to the assessment of materiality. As set out in the response to Question 4 below, Dr Whitehead served as CEO of the Company for approximately 24 days, during which time the Executive Chairman, Mr Vladimir Nikolaenko, continued to be actively involved in the management and decisions regarding the strategic direction of the Company. The Company engaged Rowntree Pty Ltd and its Principal, Mr Marcus Flis, to assist with the management of operations and project development concurrently with Dr

Whitehead's departure, ensuring continuity of management. Notwithstanding these matters, the Company accepts that the departure of the CEO was information that should have been announced to the market promptly.

2. *If the answer to any part of question 1 is "no", please advise the basis for that view.*

Not applicable. The Company's answer to Question 1 is, in substance, yes.

3. *When did SRN first become aware of the information referred to in question 1 above?*

Dr Whitehead submitted his resignation by email to the Board on Thursday, 12 March 2026. His resignation was acknowledged by email on 17 March 2026, confirming that his last day of employment would be Thursday, 19 March 2026, in accordance with the one week's notice provided in his resignation.

4. *If SRN first became aware of the information referred to in question 1 before the date of the Resignation Announcement, did SRN make any announcement prior to that date which disclosed the information? If not, please explain why the information was not released to the market at an earlier time, commenting specifically on when you believe SRN was obliged to release the information under Listing Rules 3.1 and 3.1A and what steps SRN took to ensure that the information was released promptly and without delay.*

The Company did not make any announcement prior to 26 March 2026 disclosing Dr Whitehead's resignation. The Company acknowledges that, in hindsight, this does not reflect best practice in continuous disclosure management.

Upon receipt of Dr Whitehead's resignation email on 12 March 2026, the Board's immediate focus was on managing the transition of the CEO role in an orderly manner. At the time of receipt, the precise terms of departure, including whether Dr Whitehead would serve his notice period or depart immediately, and what transition arrangements would be put in place, was not known.

In these circumstances, the Board considered that the information concerning the CEO change was, at that stage, subject to an incomplete and uncertain set of arrangements within the meaning of Listing Rule 3.1A.1, and that pending confirmation of the effective departure date and transition structure, including whether or not the CEO role would require replacement, disclosure of the change would have been premature and potentially misleading.

On 17 March 2026, Dr Whitehead's resignation was acknowledged and 19 March 2026 was confirmed as being the effective last day of his employment. Concurrently, the Board was engaged in finalising the engagement of Rowntree Pty Ltd (Mr Marcus Flis) as a replacement operational management resource, which was also being settled during this period.

The Company accepts that disclosure should have been made promptly on the effective departure date of 19 March 2026. The Company acknowledges that there was a further delay between 19 March 2026 and 26 March 2026 that is not adequately explained by the matters described above, and that this period of delay was not consistent with the Company's obligations under Listing Rule 3.1.

The information was ultimately disclosed on 26 March 2026, in an announcement marked "market sensitive" on the ASX Market Announcements Platform. The Company notes the following matters relevant to the assessment of the consequences of the delay:

- Trading volumes in SRN securities during the period between 19 March 2026 and 26 March 2026 consistent with prior trading patterns, and the Company is not aware of

any person having traded in its securities on the basis of the undisclosed information during that period.

- The information was disclosed as part of an announcement that was marked “market sensitive” and made available to all market participants simultaneously through the ASX Market Announcements Platform.
- Management has been reminded of its continuous disclosure procedures to ensure that officer-level personnel responsible for disclosure decisions are clear on the obligation to disclose changes to key management personnel promptly upon the Company becoming aware of such information.

5. *Please confirm that SRN is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.*

Save for the matters identified in the response to Question 4 above, the Company confirms that it is in compliance with the Listing Rules.

In respect of Listing Rule 3.1 specifically, the Company acknowledges that the delay in disclosing Dr Whitehead’s resignation between the date of Dr Whitehead’s resignation (19 March 2026) and the date of disclosure (26 March 2026) was not consistent with the obligation to disclose “immediately” under Listing Rule 3.1. The Company has disclosed the relevant information and is reviewing its internal disclosure procedures to prevent recurrence.

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

The Company confirms that this response has been reviewed and authorised by Vladimir Nikolaenko as Executive Chairman of Surefire Resources NL.

The Company thanks ASX for the opportunity to respond to the Letter and remains committed to meeting its continuous disclosure obligations. Should ASX require any further information in connection with the matters raised in the Letter, please do not hesitate to contact the Company Secretary.

Yours faithfully

Original signature held on file

Vladimir Nikolaenko

Executive Chairman

8 April 2026

Mr Rudolf Tieleman
Company Secretary
Surefire Resources NL

By email

Dear Mr Tieleman

Surefire Resources NL ('SRN'): ASX Aware Letter

ASX refers to the following:

- A. SRN's announcement titled "Appointment of CEO and Resignation of MD" released on the ASX Market Announcements Platform ('MAP') at 10:26 AM AEDT on Monday, 23 February 2026 and marked 'market sensitive' disclosing the appointment of Dr Andrew Whitehead as CEO of SRN effective as of Monday, 23 February 2026 (the 'Appointment Announcement').
- B. The change in the price of SRN's securities from a closing price of \$0.001 on Friday, 20 February 2026 immediately prior to the release of the Announcement to a closing price of \$0.002 following the release of the Appointment Announcement on Monday, 23 February 2026.

- C. SRN's announcement titled "New Gold Discovery at Yidby Loot" (the 'Resignation Announcement') released on MAP at 12:39 PM AEDT on Thursday, 26 March 2026 and marked 'market sensitive' disclosing the following **[with ASX's emphasis of the date of resignation added]**:

"The Company wishes to advise that it accepted Andrew Whitehead's resignation as CEO, effective as of last Thursday [19 March 2026]... As part of these changes, the position of CEO as such will remain vacant while the Company undertakes its strategic realignment."

- D. Listing Rule 3.1, which requires a listed entity to immediately give ASX 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.
- E. The definition of "aware" in Chapter 19 of the Listing Rules, which states that:

"an entity becomes aware of information if, and as soon as, an officer of the entity (or, in the case of a trust, an officer of the responsible entity) has, or ought reasonably to have, come into possession of the information in the course of the performance of their duties as an officer of that entity."

- F. Section 4.4 in *Guidance Note 8 Continuous Disclosure: Listing Rules 3.1 – 3.1B* titled "When does an entity become aware of information?"

- G. Listing Rule 3.1A, which sets out exceptions from the requirement to make immediate disclosure as follows.

"3.1A Listing rule 3.1 does not apply to particular information while each of the following is satisfied in relation to the information:

3.1A.1 One or more of the following 5 situations applies:

- It would be a breach of a law to disclose the information;*
- The information concerns an incomplete proposal or negotiation;*
- The information comprises matters of supposition or is insufficiently definite to warrant disclosure;*

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- *The information is generated for the internal management purposes of the entity; or*
 - *The information is a trade secret; and*
- 3.1A.2 *The information is confidential and ASX has not formed the view that the information has ceased to be confidential; and*
- 3.1A.3 *A reasonable person would not expect the information to be disclosed.”*
- H. The concept of “confidentiality” detailed in section 5.8 of Guidance Note 8 *Continuous Disclosure: Listing Rules 3.1 – 3.1B*. In particular, the Guidance Note states that:
- “Whether information has the quality of being confidential is a question of fact, not one of the intention or desire of the entity. Accordingly, even though an entity may consider information to be confidential and its disclosure to be a breach of confidence, if it is in fact disclosed by those who know it, then it is no longer a secret and it ceases to be confidential information for the purposes of this rule.”*
- I. Listing Rule 3.16.1 which states that:
- “3.16 An entity must immediately tell ASX the following information.*
- 3.16.1 If the entity is not an externally managed trust, a change of chair, director, CEO, CFO or secretary.”*

Request for information

Having regard to the above, ASX asks SRN to respond separately to each of the following questions:

1. Does SRN consider the following information, or any part thereof, to be information that a reasonable person would expect to have a material effect on the price or value of its securities?
 - 1.1 The change of CEO position on Thursday, 19 March 2026, being the effective date of Dr Whitehead’s resignation as CEO of SRN.
2. If the answer to any part of question 1 is “no”, please advise the basis for that view.
3. When did SRN first become aware of the information referred to in question 1 above?
4. If SRN first became aware of the information referred to in question 1 before the date of the Resignation Announcement, did SRN make any announcement prior to that date which disclosed the information? If not, please explain why the information was not released to the market at an earlier time, commenting specifically on when you believe SRN was obliged to release the information under Listing Rules 3.1 and 3.1A and what steps SRN took to ensure that the information was released promptly and without delay.
5. Please confirm that SRN is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.
6. Please confirm that SRN’s responses to the questions above have been authorised and approved in accordance with its published continuous disclosure policy or otherwise by its board or an officer of SRN 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 **2:00 PM AWST Monday, 13 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, SRN’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 SRN to request a trading halt immediately if trading in SRN's securities is not already halted or suspended.

Your response should be sent by e-mail to **ListingsCompliancePerth@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 SRN's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

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

Yours sincerely

ASX Compliance