

24 September 2026

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Juno Minerals Ltd (ASX:JNO) – Response to Appendix 3Y Change of Director's Interest Notice Query

We refer to ASX's letter regarding the Appendix 3Y lodged on the ASX Market Announcements Platform on 21 September 2026 for Mr Keith Saffy (**Notice**) (**ASX Letter**).

Our responses to each of the questions included in the ASX Letter are below.

1. Please explain why the Appendix 3Y was lodged late.

The change in Director's interests arose on 27 February 2026. As detailed in the Notice, the change in Director's indirect interest arose as a result of Juno's substantial holder Ntsimbintle Holdings (Pty) Ltd's sale of Ntsimbintle Marketing and Trading Pte. Ltd (**Ntsimbintle Marketing**) to Exxaro Ltd on 27 February 2026. Ntsimbintle Marketing ceased to be controlled by Ntsimbintle on that date. Following the sale of Ntsimbintle Marketing, Ntsimbintle Marketing (a company which Mr Saffy is the Managing Director of) is no longer an entity which may be considered to be an associate of Ntsimbintle or Safika Resources.

The Director did not notify the Company of the change within the timeframe required under ASX Listing Rule 3.19A.2. As a consequence, the Company was not aware of the change and was unable to lodge the Appendix 3Y with ASX within the required period.

Upon becoming aware of the change in the Director's interests, the Company immediately prepared and lodged the relevant Appendix 3Y with ASX.

The late lodgement resulted from an oversight by the Director and was not the result of any intention to withhold information from the market.

2. What arrangements does JNO 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?

The Company has in place arrangements designed to ensure compliance with ASX Listing Rules 3.19A and 3.19B.

These arrangements include:

- each Director is required to notify the Company Secretary promptly of any proposed dealing in the Company's securities;
- the Company's Personnel Share Trading Policy requires Directors to obtain clearance prior to dealing in the Company's securities;



- Directors are reminded of their obligations under the Corporations Act and the ASX Listing Rules regarding notification of changes in relevant interests; and
- the Company Secretary is responsible for preparing and lodging the required Appendix 3Y notifications following receipt of details of any change in a Director's interests.

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

The Company considers that its existing arrangements are generally adequate and have been appropriately implemented.

The late lodgement arose due to an isolated oversight by the Director rather than any deficiency in the Company's policies or procedures.

Notwithstanding this, the Company has taken the opportunity to reinforce the requirements of ASX Listing Rules 3.19A and 3.19B with all Directors. The Company has reminded Directors of their obligation to notify the Company Secretary immediately upon any change in their interests in the Company's securities, including changes to indirect holdings.

The Company will continue to monitor compliance with its Personnel Share Trading Policy and disclosure procedures and will provide periodic reminders to Directors regarding their obligations.

Yours sincerely

Catherine Grant-Edwards
Joint Company Secretary
Juno Minerals Limited



21 September 2026

Ms Catherine Grant-Edwards
Company Secretary
Juno Minerals Limited

By email: cath@bellatrixcorp.com.au

Dear Ms Grant-Edwards

Juno Minerals Limited ('JNO'): Appendix 3Y – Change of Director's Interest Notice Query

ASX refers to the following:

1. JNO's Appendix 3Y lodged on the ASX Market Announcements Platform ('MAP') on 21 September 2026 for Mr Keith Saffy (the 'Notice');
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 Notice indicates that a change in Mr Saffy's notifiable interest occurred on 27 February 2026. It appears that the Notice should have been lodged with ASX by 6 March 2026. Consequently, JNO may have breached Listing Rules 3.19A and/or 3.19B. It also appears that Mr Saffy 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 Appendix 3Y was lodged late.
2. What arrangements does JNO 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 JNO 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 **4.00 PMAWST Thursday, 24 September 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, JNO'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 JNO to request a trading halt immediately.

Your response should be sent to me by e-mail at ListingsSupervisionPerth@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 JNO'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 JNO's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

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