

8 October 2026

ASX Compliance – Listings (Perth)

Att: Ms Elizabeth Harris

By email: Listingscomplianceperth@ASX.com.au

Dear Ms Harris,

I refer to your letter dated 5 October 2026 and respond to your questions below.

1. Reason for late lodgement

Mr Brown's Appendix 3X was omitted due to an administrative oversight during his appointment process. He held no notifiable interests at appointment. Aspermont acknowledges that an Appendix 3X was required within five business days. When the omission was subsequently identified a notice was notice lodged on 29 September 2026. ASP regrets the oversight.

2. Existing arrangements

Directors are required to notify the Company Secretary promptly of their initial interests and subsequent changes, providing sufficient information for the relevant disclosures. The Company Secretary is responsible for preparing and lodging Appendices 3X, 3Y and 3Z within the prescribed timeframes.

3. Additional steps

ASP will amend its director appointment and acceptance letter to require incoming directors to specify their holdings and other notifiable interests in Aspermont. The Company Secretary will use this declaration to prepare and lodge the Appendix 3X within five business days of appointment.

If you have any further queries, please free to contact me on 04 1125 1136.

Yours sincerely



David Straface
Company Secretary, Aspermont Limited

5 October 2026

Mr David Straface
Company Secretary
Aspermont Limited

By email:

Dear Mr Straface

Aspermont Limited ('ASP'): Appendix 3X – Initial Director's Interest Notice Query

ASX refers to the following:

1. ASP's announcement lodged on the ASX Market Announcements Platform ('MAP') on 20 January 2026 confirming the appointment of Mr Michael Brown as a director of ASP effective on 20 January 2026;
2. ASP's Appendix 3X lodged on MAP on 29 September 2026 for Mr Brown (the 'Notice');
3. 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.'*

4. 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.'

As the Notice indicated that Mr Brown was appointed on 20 January 2026, it appears that the Notice should have been lodged with ASX by 28 January 2026. As the Notice was lodged on 29 September 2026, it appears that ASP may have breached listing rules 3.19A and/or 3.19B. It also appears that Mr Brown 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 3X was lodged late.
2. What arrangements does ASP 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 ASP 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 **3:00 PM AWST Friday, 9 October 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, ASP'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 ASP 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 ASP'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 ASP's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

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