29 October 2026

ASX Listings Compliance (Perth) ASX Limited
Level 40, Central Park
152-158 St Georges Terrace Perth WA 6000

By email: nicola.mullen@asx.com.au

Dear Ms Mullen

RESPONSE TO APPENDIX 3Y CHANGE OF DIRECTOR'S INTEREST NOTICE QUERY

Unity Metals Limited (**UM1** or **the Company**) refers to ASX's letter dated 27 October 2026 regarding the late lodgement of Appendix 3Y Change of Director's Interest Notices for Mr Andrew M Wright and Mr Craig R Mackay (**Notices**), lodged on 27 October 2026.
The Company responds to each of ASX's questions below, using the same numbering, having regard to Listing Rules 3.19A and 3.19B and ASX Guidance Note 22: *Director Disclosure of Interests and Transactions in Securities – Obligations of Listed Entities*.

1. Please explain why the Appendix 3Ys were lodged late.

The Notices relate to the expiry of 1,100,000 unlisted options held by Mr Wright and 20,000 unlisted options held Mr Mackay, each option exercisable at US$0.25 and expiring on 31 May 2026 (**Options**). The Options lapsed unexercised on that 31 May 2026.

The lapse of the Options occurred automatically under their terms. It did not involve any trading or dealing in the Company's securities by either director, and no consideration was paid or received. As a result, the expiry date was inadvertently overlooked by the Company and was not identified as a change in the directors' notifiable interests requiring an Appendix 3Y.

The oversight was identified on 26 October 2026 during a review of director holdings following the issue of new securities as a result of their participation in the Company's recently completed share purchase plan. The Company lodged the Notices promptly on 27 October 2026 once the oversight was identified.

The Company considers the late lodgement to be an isolated administrative oversight. It was not a deliberate attempt to avoid disclosure, and the directors did not deal in the Company's securities in connection with the change. The Company has not previously lodged a late Appendix 3Y.

2. What arrangements does UM1 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 the following arrangements in place with its directors:

(a) Contractual obligation to disclose. Each director has entered into a Letter of Appointment with the Company. It requires the director to notify the Company Secretary of any change in their notifiable interests as soon as practicable, and in any event within 2 business days, so that the Company can lodge an Appendix 3Y within the 5 business day period required by Listing Rule 3.19A;

(b) Securities Trading Policy. The Company has a Securities Trading Policy released to the ASX on 8 January 2026 in accordance with Listing Rule 12.9. It requires directors to obtain prior written clearance before dealing in the Company's securities and to notify the Company Secretary promptly after any dealing;

(c) Company Secretary oversight. The Company Secretary is responsible for preparing and lodging the Appendix 3Y. The Company Secretary maintains a register of directors' interests and reviews the Company's share and option registers following each issue, exercise or expiry of securities; and

(d) Awareness of obligations. Directors are made aware of their obligations under Listing Rules 3.19A and 3.19B and section 205G of the *Corporations Act 2001* (Cth) on appointment, and at every board meeting.

3. If the current arrangements are inadequate or not being enforced, what additional steps does UM1 intend to take to ensure compliance with Listing Rule 3.19B?

The Company considers that its current arrangements are adequate and are being enforced. The late lodgement arose from an administrative oversight in tracking the expiry date of the Options, rather than from any failure by the directors to disclose a dealing.

Nevertheless, to minimise the risk of recurrence, the Company has taken or will take the following additional steps:

(a) Board reporting. Directors' interests in the Company's securities will be tabled at each Board meeting, and directors will be asked to confirm that their disclosed holdings are accurate;

(b) Securities expiry calendar. The Company Secretary has established a calendar of the expiry, vesting and conversion dates of all options, performance rights and other convertible securities held by directors, with reminders set 10 business days before each date.

(c) Register reconciliation. Directors' holdings recorded by the Company will be reconciled against the share and option registers monthly, so that changes not arising from a dealing (such as expiries, lapses and vesting) are identified promptly.

(d) Reminder to directors.

The Company Secretary has written to all directors reminding them of their obligations under Listing Rules 3.19A and 3.19B and section 205G of the *Corporations Act 2001* (Cth). The reminder advises that the expiry or lapse of options is a change in notifiable interest that must be disclosed.

Review of procedures.

Following receipt of ASX's letter, the Company Secretary reviewed the Company's director disclosure procedures and the holdings of all current directors against the Company's option register. As part of that review, the Company identified that Mr Gilbert Rodgers, a director of the Company, also held 20,000 unlisted Options, which expired on 31 May 2026. An Appendix 3Y for Mr Rodgers was not lodged at the time for the same reason set out in the response to question 1.

The Company has lodged an Appendix 3Y for Mr Rodgers at the same time as this response is provided to the ASX. The review confirmed that no other directors held securities that expired, lapsed, vested or converted without a corresponding Appendix 3Y being lodged.

The Board will consider the outcome of the review at its next board meeting.

Confirmation

The Company confirms that it is in compliance with the Listing Rules, including Listing Rule 3.1.

The Company confirms that its responses to the ASX questions above have been authorised and approved by its Board.

Yours faithfully
Unity Metals Limited



Frank DeMarte
Company Secretary

1-00014-26.FD.fd

27 October 2026

Mr Frank DeMarte
Company Secretary
Unity Metals Limited

By Email: frank@unitymetals.com.au

Dear Mr DeMarte

Unity Metals Limited ('UM1'): Appendix 3Y – Change of Director's Interest Notice Query

ASX refers to the following:

1. UM1's Appendix 3Y's lodged on the ASX Market Announcements Platform (**MAP**) on 27 October 2026 for Mr Andrew Michael Wright and Mr Craig Ross Mackay (the **Notices**);
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 Notices indicate that a change in Mr Wright and Mr Mackay's notifiable interest occurred on 31 May 2026. It appears that the Notices should have been lodged with ASX by 5 June 2026. Consequently, UM1 may have breached Listing Rules 3.19A and/or 3.19B. It also appears that Mr Wright and Mr Mackay 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's were lodged late.
2. What arrangements does UM1 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 UM1 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 PM AWST Friday, 30 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, UM1'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 UM1 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 UM1'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 UM1's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

In responding to this letter, you should have regard to UM1'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 UM1'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.

Kind regards

ASX Supervision