ASPERMONT

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17 November 2026

By email: listingssupervisionperth@asx.com.au

ASPERMONT LIMITED (ASX: ASP) – APPENDIX 3Y CHANGE OF DIRECTOR'S INTEREST NOTICE QUERY

We refer to the ASX's letter dated 12 November 2026 concerning the late lodgement of Appendix 3Y notices for Mr John Stark and Mr Graeme McCracken. Aspermont Limited ("the Company") responds to the ASX's questions as follows:

1. Why were the Appendices 3Y lodged late?
The directors concerned did not obtain prior trading approval from the board or notify the Company Secretary of their transactions within the required timeframe, as required under the Company's Trading Policy.

The transactions occurred on 2 June and 3 September 2026 for Mr Stark, and 2 June 2026 for Mr McCracken. Upon becoming aware of the transactions, ASP took steps to rectify the outstanding disclosures, lodging both Appendix 3Ys on 6 November 2026.

2. What arrangements does ASP have in place under Listing Rule 3.19B?
Aspermont's Trading Policy requires Directors and other Key Management Personnel to:

- Obtain prior written approval from the Chairman or Board before trading in the Company's securities (clause 5.1).
- Provide copies of written approvals to the Company Secretary before undertaking transactions (clause 5.2).
- Notify the Company Secretary in writing of transactions within two business days (clause 5.3).

The Company acknowledges that these requirements were not followed in respect of the transactions concerned.

3. What additional steps does ASP intend to take to ensure compliance with Listing Rule 3.19B?
The Company Secretary has written to the Board and all Key Management Personnel, expressly reinforcing their obligations under the Trading Policy, particularly the requirements for prior written approval and notification of transactions. The Trading Policy has been recirculated to the Directors and Key Management Personnel.

ASP considers these measures appropriate to reinforce compliance with its existing Trading Policy and its obligations under ASX Listing Rules 3.19A and 3.19B.

This response has been authorised for release by the Chairman of Aspermont Limited.

Yours sincerely,

David Straface
Director and Company Secretary
Aspermont Limited

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12 November 2026

Mr David Straface
Company secretary
Aspermont Limited

By email:

Dear Mr Straface

Aspermont Limited (ASP): Appendix 3Y – Change of Director's Interest Notice Query

ASX refers to the following:

1. ASP's Appendices 3Y lodged on the ASX Market Announcements Platform (**MAP**) on 6 November 2026 for each of Mr John Stark and Mr Graeme McCracken (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 Notice in relation to Mr Stark indicates that changes in Mr Stark's notifiable interests occurred on 2 June 2026 and 3 September 2026. It appears that notices in relation to the change in Mr Stark's notifiable interests should have been lodged with ASX by 9 June 2026 and 10 September 2026 respectively.

The Notice in relation to Mr McCracken indicates that a change in Mr McCracken's notifiable interest occurred on 2 June 2026. It appears that the notice in relation to Mr McCracken should have been lodged with ASX by 9 June 2026.

Consequently, ASP may have breached Listing Rules 3.19A and/or 3.19B. It also appears that Mr Stark and McCracken 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 Appendices 3Y were 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 on Tuesday 17 November 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.

Kind regards

ASX Supervision