Swoop Holdings Limited
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23 November 2026

ASX Supervision
39 Martin Place
SYDNEY NSW 2000

By email only: **listingssupervisionsydney@asx.com.au**

Dear ASX Supervision,

Swoop Holding Limited (the Company)

We refer to your letter to the Company dated 19 November 2026 entitled Appendix 3Y – Change of Director's Interest Notice Query.

We respond to each of your queries as follows (adopting your numbering):

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

   The change in Director's interest associated the notice lodged on 18 November 2026, was lodged late due to an isolated administrative error in communicating the trade on 9 November 2026.

2. What arrangements does SWP 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 and the directors are aware of their obligations under ASX Listing Rules 3.19A that require the Company to notify the ASX within 5 business days after the change in interest.

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

   The Company considers that the late lodgement is an isolated incident and believes that its current practices are adequate to ensure compliance with the ASX Listing Rules are adequate. However, considering this isolated administrative error the Company has reinforced the need to ensure any change in Director interest is communicated in a timely manner to ensure that it meets its obligations in the future.

Kind regards,

Hasaka Martin
Company Secretary
On behalf of the Directors of Swoop Holdings Limited

19 November 2026

Mr Hasaka Martin
Company Secretary
Swoop Holdings Limited
Level 9
213 Miller Street
Sydney NSW 2060

By email only.

Dear Mr Martin

Swoop Holdings Limited ('SWP'): Appendix 3Y – Change of Director's Interest Notice Query

ASX refers to the following:

1. SWP's Appendix 3Y lodged on the ASX Market Announcements Platform (**MAP**) on 18 November 2026 for Mr Anthony Grist (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 Grist's notifiable interest occurred on 9 November 2026. It appears that the Notice should have been lodged with ASX by 16 November 2026. Consequently, SWP may have breached Listing Rules 3.19A and/or 3.19B.

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 SWP 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 SWP 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 **9.00 AM AEDT Tuesday, 24 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, SWP'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 SWP to request a trading halt immediately.

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

Listing Rules 3.1 and 3.1A

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