

27 May 2025

ASX Compliance

Attention: Listings Compliance (Sydney)  
By email: [compliance@asx.com.au](mailto:compliance@asx.com.au)

Dear Sir/Madam,

**RE: EQ RESOURCES LIMITED (ASX: EQR) – Appendix 3Y – Change of Director’s Interest Notice Query - Reference: 109561**

We refer to your letter dated 23 May 2025 regarding the Appendix 3Y lodged on 13 May 2025 for Mr Craig Richard Bradshaw. We respond to your queries as follows:

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

The delay in lodging the Appendix 3Y was due to an administrative oversight. The relevant change in Mr Bradshaw’s notifiable interest was inadvertently not communicated to the Company Secretary in a timely manner, which caused the delay in preparing and lodging the Appendix 3Y. The issue was identified during a routine internal review, and the notice was lodged as soon as practicable thereafter.

**2. What arrangements does EQR 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?**

EQR has established policies and procedures to ensure compliance with Listing Rule 3.19A and its disclosure obligations under Listing Rule 3.19A. These include:

- Written agreements with all directors requiring prompt disclosure of any changes in their notifiable interests.
- A standing instruction to notify the Company Secretary immediately upon execution of any trades or changes in interest.
- Regular reminders to directors of their obligations under the Listing Rules.
- Maintenance of a central register of director interests and review of ASX announcements for accuracy and timeliness.

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

While EQR believes the current arrangements are generally adequate, the Company acknowledges this incident indicates that reinforcement is necessary. Accordingly, the Company will conduct refresher training for all directors on their disclosure obligations under the ASX Listing Rules.

EQR takes its continuous disclosure obligations seriously and regrets this oversight. We are committed to ensuring compliance moving forward.

Please do not hesitate to contact me should you require any further information.

Yours sincerely,



Melanie Leydin  
Company Secretary  
EQ Resources Limited



23 May 2025

Reference: 109561

Ms Melanie Leydin  
Company Secretary  
EQ Resources Limited  
Level 4 Albert Road  
South Melbourne VIC 3205  
Australia

By email only.

Dear Ms Leydin

### **EQ Resources Limited ('EQR'): Appendix 3Y – Change of Director's Interest Notice Query**

ASX refers to the following:

1. EQR's Appendix 3Y lodged on the ASX Market Announcements Platform ('MAP') on 13 May 2025 for Mr Craig Richard Bradshaw (the 'Notice');
2. Listing Rule 3.19A which requires an entity to tell ASX the following:

**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. 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 Bradshaw's notifiable interest occurred on 28 April 2025. It appears that the Notice should have been lodged with ASX by 5 May 2025. Consequently, EQR 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 EQR 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 EQR 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 **4.30 PM AEST Tuesday, 27 May 2025**. 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, EQR'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 EQR to request a trading halt immediately.

Your response should be sent to me by e-mail at [ListingsComplianceSydney@asx.com.au](mailto:ListingsComplianceSydney@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 EQR'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 EQR's securities under Listing Rule 17.3.

### **Listing Rules 3.1 and 3.1A**

In responding to this letter, you should have regard to EQR'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 EQR'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 Compliance