



# ASX ANNOUNCEMENT

10 January 2025

## Appendix 3Y - Directors' Interest Notice Query

Black Dragon Gold (ASX:BDG; "Black Dragon" or "the Company") refers to the ASX letter dated 9 January 2025 in relation to the Appendix 3Y's for Mr Alberto Lavandeira, Mr Paul Cronin and Mr Gabriel Chiappini which were released to the ASX on 8 January 2025.

Responding to the specific questions:

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

The Company advises there was an administrative oversight in confirming the lapse of the unlisted options exercisable on or before 7 September 2024 exercise price of \$0.096.

2. What arrangements does BDG 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 entered into disclosure agreements with each director under which directors are obliged to provide all necessary information so that the Company can meet its disclosure obligations under Listing Rule 3.19A. The Company also has a notification process in place with the Company's share registry for related parties.

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

The Company confirms its current arrangements are adequate.

-ENDS-

Approved for release by the Black Dragon Gold Board of Directors

### FURTHER INFORMATION

**Shareholders contact  
Europe:**

Dominic Roberts  
**Executive Chairman**  
**Black Dragon Gold**  
M: +44 777 171 2941  
[info@blackdragongold.com](mailto:info@blackdragongold.com)

**Shareholders contact  
Australia:**

Gabriel Chiappini  
**Director**  
**Black Dragon Gold**  
M: +61 417 717 480  
[gabriel.chiappini@blackdragongold.com](mailto:gabriel.chiappini@blackdragongold.com)

**Media contact:**

Josh Nyman  
**General Manager**  
**SPOKE.**  
M: +61 413 243 440  
[josh@spokecorporate.com](mailto:josh@spokecorporate.com)

#### ABOUT BLACK DRAGON GOLD

Black Dragon Gold is the 100% owner of the 1.5m+ oz high grade Salave Gold Project, situated in the Asturias province in Northern Spain.

#### BOARD & MANAGEMENT

**Dominic Roberts**  
Executive Chairman  
**Alberto Lavandeira**  
Non-Executive Director

**Gabriel Chiappini**  
Non-Executive Director  
**Paul Cronin**  
Non-Executive Director



## ABOUT BLACK DRAGON GOLD

Black Dragon Gold Corp. (ASX:BDG) is an exploration company with a global portfolio of exploration assets. The Company's flagship project is Salave, one of the largest undeveloped gold projects in Europe. Salave is 100 per cent owned by the Company and located in the North of Spain in the province of Asturias.

In 2022 the Company acquired Australian mineral explorer Marlee Gold Pty Ltd as part of its growth strategy. The deal included the purchase of three permits with early exploration discovering near surface gold. For more information visit [www.blackdragongold.com](http://www.blackdragongold.com).

## ABOUT SALAVE PROJECT

The project has a Measured Mineral Resource of 1.03 million tonnes grading 5.59 g/t Au, containing 0.19 million ounces of gold; an Indicated Mineral Resource of 7.18 million tonnes grading 4.43 g/t Au, containing 1.02 million ounces of gold, plus Inferred Resources totalling 3.12 million tonnes grading 3.47 g/t Au, containing 0.35 million ounces of gold.

The information in this announcement that relates to the Mineral Resource estimate for the Salave project was first released by the Company in its news release entitled 'New NI 43-101 Mineral Resource Estimate Increases Resources at Salave' dated 25 October 2018.

Black Dragon confirms that it is not aware of any new information or data that materially affects the information included in the original announcement and that all material assumptions and technical parameters underpinning the estimate in the previous announcement continue to apply and have not materially changed.

A full technical report summarising the Mineral Resource estimate completed by CSA Global is available on the Company's web site ([www.blackdragongold.com](http://www.blackdragongold.com)) and posted on SEDAR. In addition to the current Mineral Resource, historical exploration work suggests there is the potential for additional mineralisation within Black Dragon's landholdings.



9 January 2025

Reference: 105092

Mr Gabriel Chiappini  
Non-Executive Director and Company Secretary  
Black Dragon Gold Corp.

By email

Dear Mr Chiappini

**Black Dragon Gold Corp. ('BDG'): Appendix 3Y – Change of Directors' Interest Notice Query**

ASX refers to the following:

1. BDG's three (3) Appendices 3Y lodged on the ASX Market Announcements Platform ('MAP') on 8 January 2025 for:

- 1.1 Mr Alberto Lavandeira;
- 1.2 Mr Paul Cronin; and
- 1.3 Mr Gabriel Chiappini.

(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.'*

For personal use only

The Notices indicate that changes in a notifiable interest for Messrs Lavandeira, Cronin and Chiappini occurred on 7 September 2024. It appears that the Notices should have been lodged with ASX by 13 September 2024. Consequently, BDG may have breached Listing Rules 3.19A and/or 3.19B. It also appears that Messrs Lavandeira, Cronin and Chiappini 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 was lodged late.
2. What arrangements does BDG 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 BDG 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 **11:30 AM AWST Tuesday, 14 January 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, BDG'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 BDG to request a trading halt immediately.

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

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

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