

13 February 2025

Company Announcements
Australian Securities Exchange Limited

Appendix 3Y – Change of Director’s Interest – Late Lodgement

I refer to your correspondence on 11 February 2025 in relation to Appendix 3Y – change in Director’s Interest Notice and to the queries ASX has raised.

The correspondence related to two trades on the Toronto Stock Exchange (“TSX”) on the same day, 20 January 2025. The query from the ASX states that the notice should have been lodged within 5 business days, but the notice was lodged prior to the market opening on 7 February 2025.

In relation to the late lodgement of the Appendix 3Y I advise that:

The trades referred to in the notice took place on the Toronto Stock Exchange and not on the ASX. The date referred to on the Appendix 3Y was the date that the trades took place in Canada and were filed on a timely basis in Canada for the TSX. Due to illness of internal filers for the ASX, the filing was delayed. The internal procedures for lodgement of Appendix 3Y’s have been upgraded, including holding discussions with all members of the filing team to coordinate their filing on the ASX as well, and in future this will ensure that Appendix 3Y’s are lodged within the correct timeframe.

The Company has reminded all Directors of the disclosure requirements set out in Listing Rule 3.19A and 3.19B. In addition, the Company policy on trading securities of the Company states the need to provide details of share transactions to allow compliance with ASX Listing Rules.

Dennis Gibson
Chief Financial Officer

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11 February 2025

Reference: 106063

Mr Chris Irwin
Company Secretary
Laramide Resources Limited

By email: C/- lloydjones@laramide.com

Dear Mr Irwin

Laramide Resources Limited ('LAM'): Appendix 3Y – Change of Director's Interest Notice Query

ASX refers to the following:

1. LAM's Appendix 3Y lodged on the ASX Market Announcements Platform ('MAP') on 7 February 2025 for Mr Marc Henderson (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 Henderson's notifiable interest occurred on 20 January 2025. It appears that the Notice should have been lodged with ASX by 28 January 2025. Consequently, LAM may have breached Listing Rules 3.19A and/or 3.19B. It also appears that Mr Henderson 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 was lodged late.
2. What arrangements does LAM 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 LAM 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 PM AWST Friday, 14 February 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, LAM'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 LAM to request a trading halt immediately.

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

Listing Rules 3.1 and 3.1A

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