

17 July 2025

ASX Listings Compliance

Attn: Yulia Gurdina

ASX Limited

Email: [ListingsComplianceSydney@asx.com.au](mailto:ListingsComplianceSydney@asx.com.au)

Dear Yulia,

**ASX Query Letter**

In response to your correspondence dated 17 July 2025 regarding increases in the price and trading volumes of shares in Raptis Group Limited (**Raptis** or the **Company**) (**ASX:RPG**), the Company's response is as follows:

1. Yes.
2. (a) No.  
(b) Yes. Please refer to the accompanying ASX announcement of today's date. Mr James Raptis has advised of his intention to resign as a director of the Company effective 30 September 2025.  
(c) Not applicable.
3. The Company is not aware of any other explanation that the Company may have for the recent trading in its securities.
4. The Company confirms it is compliant with ASX listing rule 3.1.
5. The Company confirms that the response as outlined above has been authorised and approved in accordance with its continuous disclosure policy and is released by the Company Secretary who is the designated Communications Officer and tasked with liaising with ASX.

Should you require any further clarification please do not hesitate to contact the undersigned.

Yours faithfully,

Malcolm Cory  
Company Secretary and Director

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17 July 2025

Reference: 110935

Mr Malcolm Cory  
Company Secretary  
Raptis Group Limited

By email

Dear Mr Cory

**Raptis Group Limited ('RPG'): Price - Query**

ASX refers to the following:

- A. The change in the price of RPG's securities from a low of \$0.085 on 10 July 2025 to an intraday high today, Thursday, 17 July 2025 of \$0.24 at the time of writing.
- B. The significant increase in the volume of RPG's securities traded today, 17 July 2025.

**Request for information**

In light of this, ASX asks RPG to respond separately to each of the following questions and requests for information:

1. Is RPG aware of any information concerning it that has not been announced to the market which, if known by some in the market, could explain the recent trading in its securities?
2. If the answer to question 1 is "yes".
  - (a) Is RPG relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in RPG's securities would suggest to ASX that such information may have ceased to be confidential and therefore RPG may no longer be able to rely on Listing Rule 3.1A. Accordingly, if the answer to this question is "yes", you need to contact us immediately to discuss the situation.
  - (b) Can an announcement be made immediately? Please note, if the answer to this question is "no", you need to contact us immediately to discuss requesting a trading halt (see below).
  - (c) If an announcement cannot be made immediately, why not and when is it expected that an announcement will be made?
3. If the answer to question 1 is "no", is there any other explanation that RPG may have for the recent trading in its securities?
4. Please confirm that RPG is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that RPG's responses to the questions above have been authorised and approved under its published continuous disclosure policy or otherwise by its board or an officer of RPG with delegated authority from the board to respond to ASX on disclosure matters.

**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 **2:00 PM AEST on Thursday, 17 July 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

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within the exceptions mentioned in Listing Rule 3.1A, RPG'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 RPG to request a trading halt immediately.

Your response should be sent to me by e-mail at **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, or if the answer to question 1 is "yes" and an announcement cannot be made immediately, you should discuss with us whether it is appropriate to request a trading halt in RPG'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 RPG's securities under Listing Rule 17.3.

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

In responding to this letter, you should have regard to RPG'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 RPG'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.

Regards

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ASX Compliance