

21 July 2025

Trading Halts Team
Australian Securities Exchange

By email: ListingsCompliancePerth@asx.com.au

Dear Madam,

Appendix 3X – Initial Director’s Interest Notice Query

We refer to your letter of 21 July 2025 with the above title and the requests for information set out therein.

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

The Appendix 3Y was lodged late as a result of an administrative oversight whereby one element of the process for onboarding new directors was not completed.

2. *What arrangements does ASB 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?*

ASB has the following arrangements in place:

- a) A formal notice of consent to be appointed as a director in which directors nominate their initial interest in ASB shares and other relevant shares or contracts as at the date of appointment;
 - b) A letter of engagement between the Company and each director requiring the Director to notify the Company Secretary of any changes in his or her interests in relevant securities during the term of their appointment as a director;
 - c) A schedule of Director’s interests that is updated prior to every Board meeting in which directors declare their relevant interests in shareholdings or contracts; and
 - d) A share trading policy that requires directors to notify relevant board members and the Company Secretary (as relevant) of trading in securities.
3. *If the current arrangements are inadequate or not being enforced, what additional steps does ASB intend to take to ensure compliance with Listing Rule 3.19B?*

The Company considers the current procedural arrangements are adequate; on this occasion a single step in the onboarding process was not completed due to an administrative oversight. The Company

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Secretary has reviewed and updated the process in place for onboarding new directors in order to ensure this oversight does not recur and the company (or its directors) are not in breach of Listing Rules or the Corporations Act.

Yours sincerely,



Adrian Strang
Company Secretary
Austal Ltd



21 July 2025

Mr Adrian Strang
Company Secretary
Austal Limited

By email

Dear Mr Strang

Austal Limited ('ASB'): Appendix 3X – Initial Director's Interest Notice Query

ASX refers to the following:

1. ASB's announcement lodged on the ASX Market Announcements Platform ('MAP') on 18 July 2025 confirming the appointment of Mr Richard Gibb as a director of ASB effective on 3 June 2025;
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.'

As the Notice indicated that Mr Gibb was appointed on 3 June 2025, it appears that the Notice should have been lodged with ASX by 10 June 2025. As the Notice was lodged on 18 July 2025, it appears that ASB may have breached listing rules 3.19A and/or 3.19B. It also appears that Mr Gibb 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 3X was lodged late.
2. What arrangements does ASB 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 ASB 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 Wednesday, 23 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 within the exceptions mentioned in Listing Rule 3.1A, ASB'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 ASB 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 ASB'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 ASB's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

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