

22 July 2025

ASX Listings Compliance

Attn: Yulia Gurdina

ASX Limited

Email: ListingsComplianceSydney@asx.com.au

Dear Yulia,

ASX Aware Letter

We refer to your correspondence dated 18 July 2025 (**ASX Aware Letter**) and set out the response of Raptis Group Limited (**Raptis** or the **Company**) (**ASX:RPG**) to the requests for information made in the ASX Aware Letter, using the same numbering:

1. *Does RPG consider the Information, or any part thereof, to be Information that a responsible person would expect to have a material effect on the price or value of its securities?*

Yes.

2. *If the answer to any part of question 1 is “no”, please advise the basis for that view.*

Not applicable.

3. *When did RPG first become aware of the Information referred to in question 1 above?*

Mr Raptis had indicated he was considering resigning from his position as a director of the Company prior to 17 July 2025 but had not made a final decision. Mr Raptis and the board of directors of the Company had made a decision to have confidential preliminary discussions with other individuals that may be interested in taking a position as a director of the Company.

A draft of an announcement regarding the intended resignation of Mr Raptis was prepared for consideration by Mr Raptis and the other directors of the Company late on the afternoon of 16 July 2025. However, Mr Raptis requested more time to consider his resignation and the timing of that resignation.

A meeting of directors of the Company was scheduled for 17 July 2025 including a preliminary meeting with a potential replacement.

While the board has not made a formal decision or engagement regarding a potential replacement, Mr Raptis confirmed his intention to resign with effect



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RAPTIS GROUP LIMITED

ABN 43 010 472 858

from 30 September 2025 at the meeting of directors of the Company commencing at 12.30pm on 17 July 2025.

Following receipt of this confirmation from Mr Raptis, the draft announcement was finalised and approved by the directors of the Company promptly and without delay. This was at 3.05pm on 17 July, 2025.

- 4. *If RPG first became aware of the Information referred to in question 1 before the date of the Announcement, did RPG make any announcement prior to that date which disclosed the Information? If not, please explain why the Information was not released to the market at an earlier time, commenting specifically on when you believe RPG was obliged to release the information under Listing Rules 3.1 and 3.1A and what steps RPG took to ensure that the Information was released promptly and without delay.***

As noted above, the decision with regards to the intention of Mr Raptis to resign as the director of the Company was not finalised until 17 July 2025. Following this, an announcement was finalised and approved by the directors of the Company for release promptly and without delay on 17 July 2025. An announcement was not made prior to this time as a final decision regarding the resignation of Mr Raptis had not been made.

- 5. *Please confirm that RPG is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.***

The Company confirms it is compliant with ASX Listing Rule 3.1.

- 6. *Please confirm that RPG's responses to the questions above have been authorised and approved in accordance with 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.***

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

Suite 301
Level 3
25 Elkhorn Avenue
Surfers Paradise
QLD 4217



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18 July 2025

Reference: 110961

Mr Malcolm Cory
Company Secretary
Raptis Group Limited
Building B Suite 1.03,
11 Talavera Road
MACQUARIE PARK NSW 2113

By email

Dear Mr Cory

Raptis Group Limited ('RPG'): ASX Aware Letter

ASX refers to the following:

- A. RPG's response dated 17 July 2025 (the 'Response') to ASX's price query letter dated 17 July 2025 (the 'Price Query Letter'). The Response notes:
- (a) In response to question 1 of the Price Query Letter, which was "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?":
"Yes."
 - (b) In response to question 2(b) of the Price Query Letter, which was "If the answer to question 1 is "yes" ... (b) Can an announcement be made immediately?":
"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."
- B. RPG's announcement titled "Chair Appointment/Resignation" (the 'Announcement') released on the ASX Market Announcements Platform at 3:05 PM on 17 July 2025 disclosing that Mr James Raptis will resign as a director of RPG effective 30 September 2025 (the 'Information').
- C. Listing Rule 3.1, which requires a listed entity to immediately give ASX any information concerning it that a reasonable person would expect to have a material effect on the price or value of the entity's securities.
- D. The definition of "aware" in Chapter 19 of the Listing Rules, which states that:
"an entity becomes aware of information if, and as soon as, an officer of the entity (or, in the case of a trust, an officer of the responsible entity) has, or ought reasonably to have, come into possession of the information in the course of the performance of their duties as an officer of that entity."
- E. Section 4.4 in *Guidance Note 8 Continuous Disclosure: Listing Rules 3.1 – 3.1B* titled "When does an entity become aware of information?"
- F. Listing Rule 3.1A, which sets out exceptions from the requirement to make immediate disclosure as follows.
- "3.1A Listing rule 3.1 does not apply to particular information while each of the following is satisfied in relation to the information:*
- 3.1A.1 One or more of the following 5 situations applies:*

- *It would be a breach of a law to disclose the information;*
- *The information concerns an incomplete proposal or negotiation;*
- *The information comprises matters of supposition or is insufficiently definite to warrant disclosure;*
- *The information is generated for the internal management purposes of the entity; or*
- *The information is a trade secret; and*

3.1A.2 *The information is confidential and ASX has not formed the view that the information has ceased to be confidential; and*

3.1A.3 *A reasonable person would not expect the information to be disclosed."*

- G. The concept of "confidentiality" detailed in section 5.8 of Guidance Note 8 *Continuous Disclosure: Listing Rules 3.1 – 3.1B*. In particular, the Guidance Note states that:

"Whether information has the quality of being confidential is a question of fact, not one of the intention or desire of the entity. Accordingly, even though an entity may consider information to be confidential and its disclosure to be a breach of confidence, if it is in fact disclosed by those who know it, then it is no longer a secret and it ceases to be confidential information for the purposes of this rule."

Request for information

Having regard to the above, ASX asks RPG to respond separately to each of the following questions:

1. Does RPG consider the Information, or any part thereof, to be Information that a reasonable person would expect to have a material effect on the price or value of its securities?
2. If the answer to any part of question 1 is "no", please advise the basis for that view.
3. When did RPG first become aware of the Information referred to in question 1 above?
4. If RPG first became aware of the Information referred to in question 1 before the date of the Announcement, did RPG make any announcement prior to that date which disclosed the Information? If not, please explain why the Information was not released to the market at an earlier time, commenting specifically on when you believe RPG was obliged to release the information under Listing Rules 3.1 and 3.1A and what steps RPG took to ensure that the Information was released promptly and without delay.
5. Please confirm that RPG is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.
6. Please confirm that RPG's responses to the questions above have been authorised and approved in accordance with 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 **9:00 AM AEST on 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, RPG's obligation is to disclose the information 'immediately'. This may require the information to be disclosed before the deadline set out above and may require RPG to request a trading halt immediately if trading in RPG's securities is not already halted or suspended.

Your response should be sent by e-mail to **ListingsComplianceSydney@asx.com.au**. It should not be sent directly to the ASX Market Announcements Office. This is to allow us 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.

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

We reserve 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. The usual course is for the correspondence to be released to the market.

Regards

ASX Compliance