

**ALS Limited**

Level 9B, 25 King Street  
Bowen Hills QLD 4006  
Australia  
T +61 7 3367 7900



right solutions.  
right partner.

06 November 2025

Advisers, Listings Compliance  
ASX Limited  
20 Bridge Street  
Sydney NSW 2000  
Via email

Dear Sir/Madam

**ASX: ALQ - Appendix 3Y Query**

ALS Limited (ACN 009 657 489) (ASX:ALQ) (**ALS**) refers to the ASX's letter dated 4 November 2025 (**ASX Letter**) relating to the 146,884 performance rights granted to Mr Malcolm Deane on 30 July 2025 and whether an Appendix 3Y and 3G were appropriately lodged with the ASX.

ALS' responses to ASX's queries (adopting ASX's numbering in the ASX Letter) are set out below.

**1. Please confirm whether an Appendix 3Y was lodged regarding the issue of 146,885 performance rights to Malcolm Deane. If yes, please confirm the date of the Appendix 3Y.**

ALS confirms that the performance rights issued to Mr Deane were issued as part of the annual remuneration cycle following approval of shareholders at the ALS AGM on 30 July 2025. An Appendix 3Y was lodged with ASX on 6 November 2025 after receipt of the ASX Letter.

**2. If the answer to question 1 is 'no', [ALS] may have breached Listing Rules 3.19A and/or 3.19B. It also appears that Mr Deane may have breached section 205G of the Corporations Act 2001 (Cth). Please explain why the Appendix 3Y was not lodged.**

Following receipt of the ASX Letter, ALS has identified that due to human error within the Corporate Governance team (which supports ALS' ASX compliance obligations), an Appendix 3G and an Appendix 3Y were not lodged within 5 days of receipt of shareholder approval and the issuance of the performance rights to Mr Deane.

An Appendix 3G was lodged following the end of the quarter as is customary for non-KMP performance right issuances which included the shareholder approved performance rights for Mr Deane.

**3. What arrangements does [ALS] 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?**

ALS is aware of its obligations under Listing Rules 3.10.3A, 3.19A and 3.19B and the obligations of ALS' directors under s205G of the Corporations Act. ALS has detailed documented procedures to support compliance (and undertook a review and uplift in processes in 2024). These procedures have been further reviewed in light of this error, with key regulatory obligations now embedded into new work management software with training for the Corporate Governance team. ALS reiterates its commitment to regulatory compliance.

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ALS also confirms that each of its directors are party to an agreement for the purposes of Listing Rule 3.19B.

**4. If the current arrangements are inadequate or not being enforced, what additional steps does [ALS] intend to take to ensure compliance with Listing Rule 3.19B?**

ALS does not consider that its existing arrangements, protocols and compliance procedures are inadequate. ALS will enforce these arrangements where required.

**5. Please explain why the Appendix 3G was lodged late.**

Please refer to ALS' response to question 2 above.

**6. What arrangements does [ALS] have in place to ensure compliance with Listing Rule 3.10.3A?**

Please refer to ALS' response to question 3 above.

**7. In light of the late lodgement of Appendix 3G, what additional steps will [ALS] take to ensure compliance with Listing Rule 3.10.3A?**

As ALS does not consider that any of its existing arrangements, protocols and compliance procedures are inadequate and, as set out in ALS' response to question 2 above, the late lodgements were the result of human error. ALS accordingly does not consider that additional steps are required to ensure compliance with Listing Rule 3.10.3A following the review described in ALS' response to question 2 above.

Thank you for your engagement on this matter and please contact me if you require any additional information.

Yours sincerely



Dayna Field

**General Counsel & Company Secretary**

ALS Limited

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4 November 2025

Reference: 114429

Ms Dayna Field  
Company Secretary  
ALS Limited  
Level 9B, 25 King Street  
Bowen Hills  
Brisbane QLD 4006  
Australia

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Dear Ms Field

### **ALS Limited ('ALQ'): Appendix 3Y – Change of Director's Interest Notice Query**

ASX refers to the following:

1. ALQ's Appendix 3G lodged on the ASX Market Announcements Platform ('MAP') on 11 October 2025 ('Appendix 3G') disclosing the issue of 146,884 performance rights to Malcolm Deane as a member of key management personnel on 30 July 2025.
2. Listing Rule 3.10.3A(a) which requires an entity to tell ASX details of an issue of equity securities under an employee incentive scheme to key management personnel within 5 business days of the issue.
3. Listing Rule 3.19A which requires an entity to tell ASX the following:
  - 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.*
4. 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.'*

### **Request for Information**

Under Listing Rule 18.7, we ask that you answer each of the following questions having regard to Listing Rules 3.10.3A, 3.19A and 3.19B and *Guidance Note 22: Director Disclosure of Interests and Transactions in Securities - Obligations of Listed Entities*.

1. Please confirm whether an Appendix 3Y was lodged regarding the issue of 146,885 performance rights to Malcolm Deane. If yes, please confirm the date of the Appendix 3Y.
2. If the answer to question 1 is 'no', ALQ may have breached Listing Rules 3.19A and/or 3.19B. It also appears that Mr Deane may have breached section 205G of the *Corporations Act 2001* (Cth). Please explain why the Appendix 3Y was not lodged.

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3. What arrangements does ALQ 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?
4. If the current arrangements are inadequate or not being enforced, what additional steps does ALQ intend to take to ensure compliance with Listing Rule 3.19B?
5. Please explain why the Appendix 3G was lodged late.
6. What arrangements does ALQ have in place to ensure compliance with Listing Rule 3.10.3A?
7. In light of the late lodgement of Appendix 3G, what additional steps will ALQ take to ensure compliance with Listing Rule 3.10.3A?

#### **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 **12:00 PM AEDT Friday, 7 November 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, ALQ'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 ALQ to request a trading halt immediately.

Your response should be sent to me by e-mail at [ListingsComplianceSydney@asx.com.au](mailto: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, you should discuss with us whether it is appropriate to request a trading halt in ALQ'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 ALQ's securities under Listing Rule 17.3.

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

In responding to this letter, you should have regard to ALQ'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 ALQ's obligation

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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.

Kind regards

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ASX Compliance