

ASX Compliance  
39 Martin Place,  
Sydney NSW 2000

15 January 2026

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

Dear Sir

## Appendix 3Y – Change of Director’s Interest Notice Query

We refer to your letter of 13 January 2026. Astron Limited (ATR or the Company) responds as follows, using the same numbering as your letter.

1. The exercise of options by the Directors occurred at a very busy time for the Company as preparations were underway for the Company’s Annual General Meeting held on 25 November 2025. The Directors complied with their obligations in relation to notifying the Company that their ownership interests in the Company had changed, however while the Appendix 2A in relation to the issue of shares covered by the Notice was prepared and lodged on 19 November 2025, the companion Appendices 3Y in relation to the Notice were not entered into the ASX online system at the time due to an administrative oversight.
2. The Company has written agreements with all of its directors requiring them to notify the Company of any changes to their interests. The Company informs the Director of their duties under all ASX listing rules at the time of appointment, including a dedicated section within their appointment agreement which states:

“To enable compliance with the ASX Listing Rules and the Constitution you must make certain disclosures related to and/or which might affect your role as a Director. These include:

- giving notice to the Board of any relevant or material personal interest or conflict in relation to the affairs or business of the Company;
- promptly advising details of any interests, or changes thereto, in the Company’s securities.”

As outlined above the Directors did comply with their obligations under Listing Rule 3.19B, and the reason for the breach was an administrative oversight.

3. ATR will be implementing the following steps to ensure that the Company will comply with Listing Rule 3.19B at all times in the future:
  - Requiring Directors to enter into formal disclosure agreements with the Company in the same form and structure as outlined in Attachment 1 of ASX Listing Rule Guidance Note 22 – Director Disclosure;

### Contact us

#### Astron Limited



[www.astronlimited.com.au](http://www.astronlimited.com.au)



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Level 10, 224 Queen Street, Melbourne VIC 3000

- Implementing an ASX disclosure checklist to ensure that all steps for regular ASX disclosures such as changes in director interests are completed when the original transaction is completed in requisite timeframes; and
- Potential recruitment of a Risk and Compliance Officer who will provide further assistance in maintaining compliance with the Company's ASX and other corporate compliance obligations.

Yours sincerely

**Astron Limited**



Joshua Theunissen

*General Counsel and Company Secretary*

13 January 2026

Mr Joshua Theunissen  
General Counsel and Company Secretary  
Astron Limited  
Level 10, 224 Queen Street  
Melbourne VIC 3000

By email

Dear Mr Theunissen

**Astron Limited ('ATR'): Appendix 3Y – Change of Director's Interest Notice Query**

ASX refers to the following:

1. ATR's Appendices 3Y lodged on the ASX Market Announcements Platform ('MAP') on 7 January 2026 for Mr Gerard King and Mr George Lloyd (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 the notifiable interest of Mr King and Mr Lloyd occurred on 17 November 2025. It appears that the Notice should have been lodged with ASX by 24 November 2025. Consequently, ATR may have breached Listing Rules 3.19A and/or 3.19B. It also appears that Mr King and Mr Lloyd 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 Appendices 3Y were lodged late.
2. What arrangements does ATR 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 ATR 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 **9:00 AM AEDT Friday, 16 January 2026**. 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, ATR'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 ATR 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 ATR'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 ATR's securities under Listing Rule 17.3.

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**Listing Rules 3.1 and 3.1A**

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