

5 February 2026

ASX Compliance
39 Martin Place
Sydney NSW 2000

By email: listingscompliancesydney@asx.com.au

Dear Sir/Madam,

Kelly Partners Group Holdings Limited (ASX: KPG) (KPG) Price Query

We refer to the Price Query letter from ASX Complaince received on Thursday, 5 February 2026.

KPG sets out below its response to the questions in that letter.

1. Is KPG 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?

Response: No

2. If the answer to question 1 is "yes".

- a) Is KPG relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in KPG's securities would suggest to ASX that such information may have ceased to be confidential and therefore KPG 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.

Response: No

- 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).

Response: Not Applicable

- c) If an announcement cannot be made immediately, why not and when is it expected that an announcement will be made?

Response: Not Applicable

3. If the answer to question 1 is "no", is there any other explanation that KPG may have for the recent trading in its securities?

Response: No

4. Please confirm that KPG is complying with the Listing Rules and, in particular, Listing Rule 3.1.

Response: Confirmed

5. Please confirm that KPG'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 KPG with delegated authority from the board to respond to ASX on disclosure matters.

Response: Confirmed

Yours sincerely,



Brett Kelly
Executive Chairman
Kelly Partners Group Holdings Limited

For personal use only

5 February 2026

Ms Joyce Au
Company Secretary
Kelly Partners Group Holdings Limited
Level 8, 32 Walker Street
North Sydney NSW 2060

By email

Dear Ms Au

Kelly Partners Group Holdings Limited ('PG'): Price Query

ASX refers to the change in the price of KPG's securities from a high of \$7.05 on 02/02/2026 to a low of \$5.13 today at the time of writing.

Request for information

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

1. Is KPG 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 KPG relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in KPG's securities would suggest to ASX that such information may have ceased to be confidential and therefore KPG 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 KPG may have for the recent trading in its securities?
4. Please confirm that KPG is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that KPG'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 KPG 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 **1:30 PM AEDT Thursday, 5 February 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, KPG'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 KPG to request a trading halt immediately.

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.

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 KPG's securities under Listing Rule 17.1. If you wish to request 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 and Voluntary Suspensions*.

Suspension

If you are unable to respond to this letter by the time specified above, ASX will likely suspend trading in KPG's securities under Listing Rule 17.3.1.

Listing Rules 3.1 and 3.1A

In responding to this letter, you should have regard to KPG'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 KPG'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. The usual course is for correspondence to be released to the market.

Yours faithfully

ASX Compliance