

4 March 2026

ASX Listings Compliance Home Branch Sydney  
Attention: Ms Nicola Lombardi (Adviser, Listings Compliance)  
**By email: [ListingsComplianceSydney@asx.com.au](mailto:ListingsComplianceSydney@asx.com.au).**

Dear Ms Lombardi

**Beetaloo Energy Australia Limited (ASX: BTL) ('BTL' or the 'Company') - Response to ASX Appendix 3Y Query**

We refer to ASX's letter dated 3 March 2026 regarding BTL's Appendix 3Y – Change of Director's Interest Notice Query in relation to:

1. Late lodgement of the Appendix 3Y.
2. BTL's arrangements under Listing Rule 3.19B to ensure its directors meet their disclosure obligations under Listing Rule 3.19A.
3. Any additional steps that may be required by BTL to ensure compliance with Listing Rule 3.19B.

**BTL responds, following like-numbering:**

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

The Appendix 3Y lodged with the ASX on 2 March 2026 refers to two transactions broken down as follows:

- Transaction one – 27 February 2026 – Lapsing of Performance Rights  
BTL confirms that this change of interest was not queried by the ASX and was lodged within the requisite timeframe prescribed by the ASX.
- Transaction two – 17 February 2026 – Vesting of Performance Rights  
At the time of preparing the Appendix 3Y to notify the market of the lapse of performance rights, the Company believed that the transfer of existing unvested performance rights to vested performance rights did not trigger section 205G of the *Corporations Act 2001* (Cth) or Listing Rule 3.19A.2.

The late lodgement of the Appendix 3Y on 2 March 2026 was an administrative oversight and was intended for transparency and alignment with the Appendix 3G released to the ASX on the same day.

The Company has reconsidered its technical interpretation of a "change to a notifiable interest of a director" from an ASX Listing Rule and Corporations Act perspective and concluded that the transfer of existing unvested performance rights to vested performance rights constitutes a change that must be disclosed to the market via an Appendix 3Y no more than 5 business days after the change.

**2. What arrangements does BTL 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?**

BTL has arrangements in place intended to ensure compliance with Listing Rules 3.19A and 3.19B, including:

- The Company's Continuous Disclosure Policy notes that the Company Secretary is responsible for ensuring that necessary disclosures are made to the ASX as and when required.
- Directors must immediately inform the Company Secretary of any changes to their notifiable interests.
- The Company has informed Directors that they must provide all information necessary to enable the preparation and lodgement of Appendices 3X, 3Y and 3Z within the required timeframes.
- Directors are informed of their obligations under the Listing Rule 3.1 regularly.

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

The Company considers the late lodgement of the Appendix 3Y to be an isolated incident and that it has adequate arrangements in place to ensure compliance with Listing Rule 3.19A. All Directors will be re-briefed at the forthcoming board meeting in March 2026 on their obligations pertaining to their dealings in the Company's securities (either personally or through an associate) and the Company's continuous disclosure obligations specifically under Listing Rules 3.19A and 3.19B.

**Ends.**

**Authorised by:**

Alex Underwood  
Managing Director

3 March 2026

Ms Sally Greenwood  
Company Secretary  
Automatic Group

By email only.

Dear Ms Greenwood

**Beetaloo Energy Australia Limited ('BTL'): Appendix 3Y – Change of Director's Interest Notice Query**

ASX refers to the following:

1. BTL's Appendix 3Y lodged on the ASX Market Announcements Platform ('MAP') on 2 March 2026 for Mr Alexander Underwood (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 Mr Underwood's notifiable interest occurred on 17 February 2026. It appears that the Notice should have been lodged with ASX by 24 February 2026. Consequently, BTL may have breached Listing Rules 3.19A and/or 3.19B.

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## 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 3Y was lodged late.
2. What arrangements does BTL 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 BTL 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 **11.00 AM AEDT Friday, 6 March 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, BTL'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 BTL 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 BTL'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 BTL's securities under Listing Rule 17.3.

## Listing Rules 3.1 and 3.1A

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In responding to this letter, you should have regard to BTL'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 BTL'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.

Kind regards

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ASX Compliance