



1 April 2026

ASX Compliance
ListingsComplianceSydney@asx.com.au

Dear ASX Compliance Team

Fiducian Group Limited ('FID or Fiducian')
Price Query

We refer to your letter dated 1 April 2026 and the request for information contained in that letter.

We respond as follows (using your numbering).

- 1. Is FID 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? In responding to this question please have regard to the Australian Prudential Regulation Authority (APRA) media release dated 1 April 2026 titled, 'APRA imposes additional licence conditions on Fiducian'.**

No.

We considered APRA's announcement but as the matters giving rise to the media release related to licence conditions of the RSE Licensee subsidiary and did not impact Fiducian's ongoing operations, whether at a subsidiary or a group level, we did not consider APRA's media release to be a matter that would impact the share price. We note that when any previous additional licence condition was issued, no adverse price movement was noticed and we issued a public announcement in the media. We expected the same outcome in the present circumstances.

The Trustee of the Fiducian Superannuation Fund responded to APRA's media release as follows;

"The Trustee for the Fiducian Superannuation Fund (Fiducian or Fund) acknowledges receipt of APRA's additional licence conditions. Fiducian respects APRA's role as Australia's prudential regulator and takes the requirements raised by them seriously. We are reviewing the matter and are committed to engaging constructively with APRA as always. Fiducian has established frameworks for investment governance, investment options and board operations and shall appoint independent experts as required, to review and recommend any improvement opportunities which Fiducian will implement. The aforesaid additional licence conditions do not affect the continuing operations of the Fund or safety of members' assets.

Fiducian can confirm that our processes have avoided high-risk products such as Shield Master Fund and First Guardian Master Fund."

The recent APRA media release has not had any material impact on future earnings capabilities requiring additional disclosure.

- 2. If the answer to question 1 is "yes".**
 - (a) Is FID relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in FID's securities would suggest to ASX that such information may have ceased to be confidential and therefore FID 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?

N/A

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

No.

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

Fiducian confirms that it is complying with the Listing Rules and in particular Listing Rule 3.1.

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

We can confirm that Fiducian’s responses to the questions above have been authorised and approved consistent with its published continuous disclosure policy.

Please do not hesitate to contact me should the ASX require any further assistance on this matter.

Yours faithfully,

Paul Gubecka
General Counsel & Company Secretary

1 April 2026

Mr Paul Gubecka
Company Secretary
Fiducian Group Limited
Level 4, 1 York Street
Sydney NSW 2000

By email

Dear Mr Gubecka

Fiducian Group Limited ('FID'): Price Query

ASX refers to the following:

A. The change in the price of FID's securities from a close of \$9.58 on 31/03/2026 to a low of \$7.88 today.

Request for information

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

1. Is FID 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? In responding to this question please have regard to the Australian Prudential Regulation Authority (APRA) media release dated 1 April 2026 titled, 'APRA imposes additional licence conditions on Fiducian'.
2. If the answer to question 1 is "yes".
 - (a) Is FID relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in FID's securities would suggest to ASX that such information may have ceased to be confidential and therefore FID 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 FID may have for the recent trading in its securities?
4. Please confirm that FID is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that FID'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 FID 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 AEDT Thursday, 2 April 2026**.

For personal use only

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, FID'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 FID 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 FID'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 FID'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 FID'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 FID'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