

09 May 2023

Appendix 3Y – Late Lodgement Notice

Please find attached Appendix 3Y “Change of Director’s Interest Notice” for Mr Alex Kent. This was released to market on 04 May 2023.

This 3Y includes a transaction dated 05 February 2023 which under Listing Rule 3.19A.2 required disclosure to market by 12 February 2023.

In relation to the late lodgement of this 3Y, Aspermont (“the Company”) advises the following:

1. The Appendix 3Y was lodged late due to an administrative oversight following the lapse of performance rights. As soon as the oversight was identified the documents were lodged with the ASX.
2. The Company and the Directors are aware of their obligations under ASX Listing Rules 3.19A and 3.19B to provide the necessary information to the Company to meet its disclosure requirements. The Company has a Trading Policy in place which sets out Directors requirements to notify the Company of changes in interests.
3. The Company considers this late lodgement as an isolated breach. The Company has reviewed its procedures around performance rights and believes that its current practices are adequate to ensure compliance with the ASX Listing Rules.

This announcement has been authorised by the Board of Directors.

Yours sincerely,

Tim Edwards,
Company Secretary

Appendix 3Y

Change of Director's Interest Notice

Information or documents not available now must be given to ASX as soon as available. Information and documents given to ASX become ASX's property and may be made public.

Introduced 30/09/01 Amended 01/01/11

Name of entity Aspermont Limited
ABN 66 000 375 048

We (the entity) give ASX the following information under listing rule 3.19A.2 and as agent for the director for the purposes of section 205G of the Corporations Act.

Name of Director	Alexander L. Kent
Date of last notice	09 March 2022

Part 1 - Change of director's relevant interests in securities

In the case of a trust, this includes interests in the trust made available by the responsible entity of the trust

Note: In the case of a company, interests which come within paragraph (i) of the definition of "notifiable interest of a director" should be disclosed in this part.

Direct or indirect interest	Indirect
Nature of indirect interest (including registered holder) <small>Note: Provide details of the circumstances giving rise to the relevant interest.</small>	WHITE RABBIT VENTURES
Date of change	04 May 2023 - Issue of Rights. 05 Feb 2023 - Lapse of Rights. Lapse announced to market on 17/02/2023 however 3Y is delayed due to an administrative oversight.
No. of securities held prior to change	1. 271,357,877 ordinary shares; 2. 258,245,641 Unlisted Options \$0.03 / 30 Sep 2025 3. 104,316,667 Performance Rights
Class	1. Ordinary Shares 2. Unlisted Options \$0.03 strike, expiry 30 September 2025 3. Unlisted Incentive Performance Rights
Number acquired	04 May 2023 - Issued 15,666,667 Unlisted Incentive Performance Rights
Number disposed	05 Feb 2023 - Lapsed 420,000 Unlisted Incentive Performance Rights

+ See chapter 19 for defined terms.

Appendix 3Y

Change of Director's Interest Notice

Value/Consideration <small>Note: If consideration is non-cash, provide details and estimated valuation</small>	No cash consideration for either. Issued under the terms of the Aspermont Performance Rights Plan approved by shareholders on 28/02/2023. – Resolution 8. FY23 Issue approved by shareholders on 28/02/2023. – Resolution 5.
No. of securities held after change	1. 271,357,877 ordinary shares; 2. 258,245,641 Unlisted Options \$0.03 / 30 Sep 2025 3. 119,563,334 Performance Rights
Nature of change <small>Example: on-market trade, off-market trade, exercise of options, issue of securities under dividend reinvestment plan, participation in buy-back</small>	Issued under the terms of the Aspermont Performance Rights Plan approved by shareholders on 28/02/2023. – Resolution 8. FY23 Issue approved by shareholders on 28/02/2023. – Resolution 5. Lapsed under the terms of the Aspermont Performance Rights Plan approved by shareholders on 02/03/2021. – Resolution 3.

Part 2 – Change of director's interests in contracts

Note: In the case of a company, interests which come within paragraph (ii) of the definition of “notifiable interest of a director” should be disclosed in this part.

Detail of contract	N/A
Nature of interest	N/A
Name of registered holder (if issued securities)	N/A
Date of change	N/A
No. and class of securities to which interest related prior to change <small>Note: Details are only required for a contract in relation to which the interest has changed</small>	N/A
Interest acquired	N/A
Interest disposed	N/A
Value/Consideration <small>Note: If consideration is non-cash, provide details and an estimated valuation</small>	N/A
Interest after change	N/A

Part 3 – ⁺Closed period

+ See chapter 19 for defined terms.

Were the interests in the securities or contracts detailed above traded during a ⁺ closed period where prior written clearance was required?	No
If so, was prior written clearance provided to allow the trade to proceed during this period?	N/A
If prior written clearance was provided, on what date was this provided?	N/A

⁺ See chapter 19 for defined terms.



5 May 2023

Reference: 73918

Mr Tim Edwards
Company Secretary
Aspermont Limited
613-619 Wellington Street
Perth WA 6000

tim.edwards@aspermontmedia.com

Dear Mr Edwards

Aspermont Limited ('ASP'): Appendix 3Y – Change of Director's Interest Notice Query

ASX refers to the following:

1. ASP's Appendix 3Y lodged on the ASX Market Announcements Platform ('MAP') on 4 May 2023 for Mr Alexander Kent (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 Kent's notifiable interest occurred on 5 February 2023. It appears that the Notice should have been lodged with ASX by 12 February 2023. Consequently, ASP may have breached Listing Rules 3.19A and/or 3.19B. It also appears that Mr Kent 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 Appendix 3Y was lodged late.
2. What arrangements does ASP 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 ASP 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 **2:00 PM AWST Wednesday, 10 May 2023**. 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, ASP'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 ASP to request a trading halt immediately.

Your response should be sent to me by e-mail at ListingsCompliancePerth@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 ASP'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 ASP's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

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

We reserve the right to release a copy of this letter, your reply and any other related correspondence between us to the market under Listing Rule 18.7A.

Questions

If you have any questions in relation to the above, please do not hesitate to contact me.

Yours sincerely

Lachlan Pethick
Adviser, Listings Compliance

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