

2 January 2024

Ms Barbara Lim
Adviser, Listings Compliance (Perth)
ASX Limited
Level 40, Central Park
152-158 St George's Terrace
PERTH WA 6000

Transmitted by email to:

listingscomplianceperth@asx.com.au

Dear Barbara,

RESPONSE TO ASX QUERY – CHANGE OF DIRECTORS' INTEREST NOTICES

In reference to your letter to Surefire Resources NL (**SRN** or the **Company**) dated 27 December 2023, we set out below the ASX's requests and the Company's italicized response to each of those questions using the same numbering as used in that letter.

1. Please explain why the Appendix 3Y's were lodged late.
 - *The security issues advised on each of the Appendix 3Ys were made during the day of Thursday 14 December 2023. The release was ready for lodgement post market close on Thursday 21 December 2023 but it was considered that a release pre-open on Friday 22 December 2023 would be compliant with the five business day lodgement requirement. It is noted that the ASX have taken each of the dates as being one full day and this will be taken into account when considering the timing of future lodgements.*
2. What arrangements does SRN 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?
 - *SRN considers that it has proper arrangements in place 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 SRN intend to take to ensure compliance with Listing Rule 3.19B?
 - *There is no requirement to change the current arrangements which SRN considers are being adequately enforced.*

Yours faithfully

[Sent electronically with approval but without signature]

Rudolf Tieleman
Company Secretary



27 December 2023

Reference: 86505

Mr Rudolf Tieleman
Company Secretary
Surefire Resources NL

By email

Dear Mr Tieleman

Surefire Resources NL ('SRN'): Appendix 3Y – Change of Director's Interest Notice Query

ASX refers to the following:

1. SRN's Appendix 3Y lodged on the ASX Market Announcements Platform ('MAP') on 22 December 2023 for Mr Vladimir Nikolaenko, Mr Roger Smith and Mr Paul Burton (the 'Notices');

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 Notices indicate that a change in Mr Nikolaenko's, Mr Smith's and Mr Burton's notifiable interests occurred on 14 December 2023. It appears that the Notices should have been lodged with ASX by 21 December 2023. Consequently, SRN may have breached Listing Rules 3.19A and/or 3.19B.

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 3Ys were lodged late.
2. What arrangements does SRN 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 SRN 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 **1:00 PM AWST Tuesday, 2 January 2024**. 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, SRN'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 SRN 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 SRN'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 SRN's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

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

Yours sincerely

ASX Compliance