

1 August 2024

ASX Compliance Pty Ltd  
Level 40, Central Park  
152-158 St Georges Tce  
Perth WA 6000

**By email:** listingscomplianceperth@asx.com.au

To whom it may concern

**RE: Monadelphous Group Limited (ASX:MND) – Response to ASX Price Query Letter**

Monadelphous Group Limited (**MND** or the **Company**) refers to the ASX price query letter dated 1 August 2024 and provides the following responses:

1. *Is MND 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?*

**MND response:** No. The Company was notified by Albemarle earlier today (1 August 2024) of the termination of certain contracts relating to Albemarle's Kemerton Project. The Company became aware at approximately 6.35am (WST) of the termination of the construction contracts (effective 12 September) by receipt of written notice, and was subsequently verbally notified about the termination of the maintenance services and sustaining capital projects contracts at approximately 8.20am (WST). The Company also became aware (at approximately 7.00am (WST) via the West Australian (online)) of media comment attributing statements to Albemarle regarding the status of its Kemerton Project. In response to these matters the Company promptly and without delay took steps to verify the information, to understand its likely impact on the Company (including, once known, the incremental effect of termination of the maintenance services and sustaining capital projects contracts) and to prepare and release an ASX announcement (headed "Albemarle Contracts Update") this morning. The ASX announcement was lodged with ASX at approximately the same time as receipt of the ASX price query letter.

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

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

**MND response:** Not applicable.

*(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).*

**MND response:** Not applicable – see response to question 1 above regarding announcement already made.

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

**MND response:** Not applicable

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

**MND response:** Not applicable - see response to question 1 above.

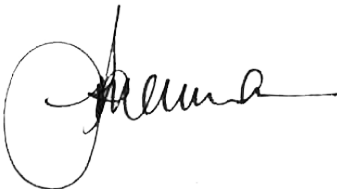
4. *Please confirm that MND is complying with the Listing Rules and, in particular, Listing Rule 3.1.*

**MND response:** Confirmed.

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

**MND response:** Confirmed.

Yours sincerely



Philip Trueman  
**Company Secretary**



1 August 2024

Reference: 97385

Ms Kristy Glasgow & Mr Philip Trueman  
Company Secretary  
Monadelphous Group Limited

By email

Dear Ms Glasgow and Mr Trueman

**Monadelphous Group Limited ('MND'): Price - Query**

ASX refers to the following:

- A. The change in the price of MND's securities from a close of \$12.97 on 31 July 2024 to an intra-day low of \$11.95 today.

**Request for information**

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

1. Is MND 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 MND relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in MND's securities would suggest to ASX that such information may have ceased to be confidential and therefore MND 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 MND may have for the recent trading in its securities?
4. Please confirm that MND is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that MND'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 MND 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 **11:30 AM AWST Thursday, 1 August 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, MND's obligation is to disclose the information

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‘immediately’. This may require the information to be disclosed before the deadline set out in the previous paragraph and may require MND 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, 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 MND’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 MND’s securities under Listing Rule 17.3.

### **Listing Rules 3.1 and 3.1A**

In responding to this letter, you should have regard to MND’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 MND’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

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ASX Compliance