

8 January 2025

Ms Nicola Mullen
Senior Adviser, Listings Compliance
Australian Securities Exchange
Level 40, Central Park
152-158 St Georges Terrace
Perth WA 6000

By Email: ListingsCompliancePerth@asx.com.au

Dear Ms Mullen

Finder Energy Holdings Limited ('FDR'): Appendix 3Y – Change of Director's Interest Notice Query

We refer to your letter dated 7 January 2025 advising Finder Energy Holdings Limited (FDR)(Company) of the late lodgement, by one day, of the Appendix 3Y for Mr Damon Neaves under Listing Rule 3.19A.2 on 3 January 2025.

We acknowledge the late lodgement of the Appendix 3Y accordingly and as required by Listing Rule 18.7 in relation to Listing Rules 3.19A and 3.19B we have provided answers to the following questions as detailed in your letter:

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

The trade was processed through a holding account which had not been previously established on Finder's registry management system to track movements in Director's holdings. As such, although the Company was made aware of the trade by Mr Damon Neaves in accordance with the Company's Security Trading Policy, refer below, it incorrectly determined the settlement date for the trade prior to breaking for Christmas. Based on this determination the Company incorrectly assessed the last day for lodgement as 3 January 2025 rather than 2 January 2025.

2. What arrangements does FDR 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?

The Company's Security Trading Policy requires Directors to provide details of changes in Finder securities they hold (directly or indirectly) to the Company Secretary as soon as reasonably possible (and no later than three business days) after any change to their relevant interest in Finder securities to enable Finder to comply with its obligations under the ASX Listing Rules.

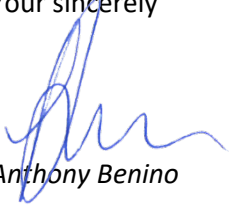
In addition, Finder's registry management system tracks all movements in Director's holdings. Any movement in specified Director holdings results in an alert to the Company Secretary who on behalf of the Company enforces compliance with Listing Rule 3.19A.2 by ensuring the lodgement of an Appendix 3Y.

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

Directors will be required, prior to being given approval to trade under the Security Trading Policy, to confirm the account through which they will trade in in FDR. The approval to be provided will be specific to that account only.

We trust our explanations are sufficient and appropriate. Should you have any further questions please to not hesitate to contact me.

Your sincerely



Anthony Benino
Company Secretary



7 January 2025

Mr Anthony Benino
Company Secretary
Finder Energy Holdings Limited

By Email: a.benino@longreachcap.com

Dear Mr Benino

Finder Energy Holdings Limited ('FDR'): Appendix 3Y – Change of Director's Interest Notice Query

ASX refers to the following:

1. FDR's Appendix 3Y lodged on the ASX Market Announcements Platform ('MAP') on 3 January 2025 for Mr Damon Neaves (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 Neaves's notifiable interest occurred on 23 December 2024. It appears that the Notice should have been lodged with ASX by 2 January 2025. Consequently, FDR 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 3Y was lodged late.
2. What arrangements does FDR 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 FDR 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 **12:00 PM AWST Friday, 10 January 2025**. 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, FDR'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 FDR 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 FDR'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 FDR's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

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