

18 April 2024

The Manager
ASX Limited
20 Bridge Street
SYDNEY NSW 2000

Dear Sir/Madam

Re Vintage Energy Ltd ('VEN'): Cleansing notice – Aware Query

We refer to your letter dated 15 April 2024 which asks several questions. Our responses are detailed below.

1 Does VEN consider the Information to be information that a reasonable person would expect to have a material effect on the price or value of its securities?

No

2. If the answer to question 1 is “no”:

2.1 Please explain the basis for that view.

Rainfall events of this nature are reasonably normal at this time of year but often sporadic in terms of heavy vs light. Because of the nature of the country these events have a significant effect on access. The remoteness of many of the access roads and tracks, the sometimes-disparate locations of necessary equipment needed to get to site predicate against an instant assessment of how much delay may occur when mobilising. Whether spud date is next week or several weeks hence is not considered material or market sensitive. The sensitivity would be whether the well was to spud.

VEN notes that there was no material change in the share price following the announcement, which indicates the information was not considered market sensitive.

2.2 Please explain why the Announcement was marked as market sensitive.

This was an administrative error.

3. If the answer to question 1 is “yes”,

3.1 Was VEN aware of the Information (or a substantive proportion of the Information) at the time that it released the Cleansing Notice on MAP

Not applicable

3.2 If the answer to question 3.1 is ‘no’, when did VEN become aware of the Information, given the Announcement was released just two business days after the Cleansing Notice. In answering this question, please specify the date and time when VEN first became aware of the Information or any part thereof.

Not applicable

3.3 If the answer to question 3.1 is “yes”, does VEN consider the Cleansing Notice to be defective pursuant to section 708A (10)(a) of the Corporations Act? Please note that if VEN forms the view that the Cleansing Notice may be defective, VEN may need to consider whether it has an obligation to correct a defective cleansing notice pursuant to section 708A of the Corporations Act, or through any alternative action it considers appropriate.

Not applicable

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

VEN has various policies and procedures to ensure compliance with Listing Rule 3.1 including its Disclosure policy disclosed on its website.

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

VEN confirms that the above responses have been authorised and approved by the Board of Directors

Yours faithfully

A handwritten signature in blue ink, appearing to read 'SG', with a horizontal line underneath.

Simon Gray
Company Secretary



15 April 2024

Reference: 92240

Mr Simon Gray
Company Secretary
Vintage Energy Ltd

By email: simon.gray@vintageenergy.com.au

Dear Mr Gray

Vintage Energy Ltd ('VEN'): Cleansing notice – Aware Query

ASX refers to the following:

- A. VEN's announcement titled 'Cleansing Notice' released on the ASX Market Announcements Platform ('MAP') at 1:17pm on 8 April 2024 ('Cleansing Notice'), disclosing that VEN has issued 130,484,409 fully paid ordinary shares in the capital of VEN and that, at the time of the Cleansing Notice, there was no excluded information within the meaning of sections 708A(7) and 708A(8) of the *Corporations Act 2001* (the 'Corporations Act') which was required to be disclosed under section 708A(6)(e) of the Corporations Act.
- B. VEN's announcement titled 'Operations update following Cooper Basin rainfall' released on MAP at 9:23am on 10 April 2024 ('Announcement'), marked by VEN as "market sensitive", in which VEN states that:

"Vintage Energy Ltd . . . provides the following update on the timing of Odin appraisal following substantial rainfall in the Cooper Basin in April.

The resultant flooding and road closures has prevented ground access, disrupting freight of equipment and site preparation.

Current estimates are for this situation to persist for several weeks, with this timeline being highly dependent on ongoing weather conditions such as the rate of evaporation and additional rainfall. With this qualification, it is now expected site preparation will commence in early May, with rig mobilisation to site to occur subsequently.

Vintage anticipates spudding of the Odin-2 appraisal well will most likely occur in May, approximately one month later than advised in the investor presentation lodged with the ASX on 27 March 2024."

(the 'Information').

- C. Listing Rule 3.1, which requires a listed entity to immediately give ASX any information concerning it that a reasonable person would expect to have a material effect on the price or value of the entity's securities.
- D. The definition of 'aware' in Chapter 19 of the Listing Rules, which states that:

'an entity becomes aware of information if, and as soon as, an officer of the entity (or, in the case of a trust, an officer of the responsible entity) has, or ought reasonably to have, come into possession of the information in the course of the performance of their duties as an officer of that entity.'

Additionally, VEN should refer to section 4.4 in Guidance Note 8 *Continuous Disclosure*: Listing Rules 3.1 – 3.1B 'When does an entity become aware of information'.

- E. Listing Rule 3.1A, which sets out exceptions from the requirement to make immediate disclosure, provided that each of the following are satisfied.

'3.1A Listing rule 3.1 does not apply to particular information while each of the following requirements is satisfied in relation to the information:

3.1A.1 One or more of the following applies:

- It would be a breach of a law to disclose the information;*
- The information concerns an incomplete proposal or negotiation;*
- The information comprises matters of supposition or is insufficiently definite to warrant disclosure;*
- The information is generated for the internal management purposes of the entity; or*
- The information is a trade secret; and*

3.1A.2 The information is confidential and ASX has not formed the view that the information has ceased to be confidential; and

3.1A.3 A reasonable person would not expect the information to be disclosed.'

Request for information

Having regard to the above, ASX asks VEN to respond separately to each of the following questions and requests for information:

1. Does VEN consider the Information to be information that a reasonable person would expect to have a material effect on the price or value of its securities?
2. If the answer to question 1 is "no":
 - 2.1 Please explain the basis for that view.
 - 2.2 Please explain why the Announcement was marked as market sensitive.
3. If the answer to question 1 is "yes":
 - 3.1 Was VEN aware of the Information (or a substantive proportion of the Information) at the time that it released the Cleansing Notice on MAP?
 - 3.2 If the answer to question 3.1 is "no", when did VEN become aware of the Information, given the Announcement was released just two business days after the Cleansing Notice. In answering this question, please specify the date and time when VEN first became aware of the Information or any part thereof.
 - 3.3 If the answer to question 3.1 is "yes", does VEN consider the Cleansing Notice to be defective pursuant to section 708A (10)(a) of the Corporations Act? Please note that if VEN forms the view that the Cleansing Notice may be defective, VEN may need to consider whether it has an obligation to correct a defective cleansing notice pursuant to section 708A of the Corporations Act, or through any alternative action it considers appropriate.
4. Please confirm that VEN is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that VEN's responses to the questions above have been authorised and approved in accordance with its published continuous disclosure policy or otherwise by its board or an officer of VEN 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 **9:30 AM AEST Thursday, 18 April 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, VEN'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 VEN 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 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 VEN'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 & Voluntary Suspensions*.

Suspension

If you are unable to respond to this letter by the time specified above, ASX will likely suspend trading in VEN's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

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