



LARAMIDE RESOURCES LTD.

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Level 40, Central Park
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Australia

3 May 2024

By email: ListingsCompliancePerth@asx.com.au

Director's Appendix 3Y – Late Lodgement Reference: 93504

I refer to your letter dated 2 May 2024 in relation to the recently lodged Appendix 3Y – Change in Directors Interest Notice ("Notice") and to the queries the ASX has raised.

The Notice relates to Laramide's Appendix 3Y lodged on the ASX Market Announcements Platform ('MAP'), 2 May 2024 for Mr. Marc Henderson.

Laramide has been listed on the main board of the TSX since 2006 and has also been listed on the ASX since 2013 and certainly appreciates the absolute requirement to adhere to all rules and regulations. Laramide takes great effort to be completely compliant with both ASX and TSX. The TSX and ASX have similar rules regarding the reporting of transactions by Directors.

Of the five Laramide directors, two update SEDI filings themselves and instruct Laramide to submit the ASX filing, while three report their transaction to Laramide who in turn updates both the ASX and SEDI records. The Directors have previously been made aware of the disclosure requirements set out in Listing Rule 3.19 but it seems in this instance Mr. Henderson failed to notify Laramide of the share transactions of 22, 27 and 29 February 2024 as he reported to SEDI. The SEDI records are up to date and the Company has not had any issues with late reporting of Director transactions.

The late filings for Marc Henderson should have been recognized earlier as our internal procedures are such that SEDI and ASX balances should be reconciled weekly. We have re-instructed the Laramide accounting department of the importance and necessity of doing the reconciliation procedure weekly.

The directors have previously been advised of their responsibility to ensure that any Director transactions are reported to both the TSX through SEDI and the ASX. At the Laramide Board of Director meeting held on the morning of May 3, 2024 the directors were reminded of their responsibility to post their transactions on both SEDI and the ASX.

The above explanations I think disclose the cause of the Appendix 3Y late reporting and provide our solution to prevent a further occurrence.

Your consideration is requested.

Dennis Gibson
Chief Financial Officer.

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2 May 2024

Reference: 93504

Mr Chris Irwin
Company Secretary
Laramide Resources Limited

By email: c/- Lloyd Jones (lloydjones@laramide.com)

Dear Mr Irwin

Laramide Resources Limited ('LAM'): Appendix 3Y – Change of Director's Interest Notice Query

ASX refers to the following:

1. LAM's Appendix 3Y lodged on the ASX Market Announcements Platform ('MAP') today, 2 May 2024 for Mr Marc Henderson (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 Henderson's notifiable interest occurred on 22, 27 and 29 February 2024. It appears that the Notice should have been lodged with ASX by 29 February, 5 March and 7 March 2024 respectively.

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 LAM 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 LAM 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 **12:30 PM AWST Tuesday, 7 May 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, LAM'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 LAM 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 LAM'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 LAM's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

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