

6 September 2024

Australian Securities Exchange
Level 40, Central Park
152-158 St Georges Terrace
Perth WA 6000

Email: ListingsCompliancePerth@asx.com.au

Attention: shane.falconer@asx.com.au

Dear ASX.

**Response to the ASX in relation to the lodgement of Directors Interest
Notices for West Cobar Metals Limited (ASX: WC1) ("WC1" or the "Company").**

The Company refers to your enquiry dated 5 September 2024 in relation to the Appendix 3Y's "Change of Directors Interests Notices" lodged on the ASX MAP on 4 September 2024 and responds in accordance with the numbering used on the ASX request as follows:

1. The Appendix 3Y notices were not lodged by the prescribed date being 30 August 2024 and were subsequently lodged on the 4 September 2024. This late lodgment was an administrative oversight and the 3Y's were lodged immediately by the Company as soon as the oversight was discovered.

The Company wishes to advise that the changes in Directors Interests Notices pertained to the allocation of Listed Options as a result of Director participation in an Entitlements Offer and no securities have been traded by Directors.

2. All Directors of the Company are aware of ASX listing Rule 3.19A and their respective obligations to provide relevant information to the Company to comply with listing rules 3.19A and 3.19B.

At the time of their initial appointment each Director is required to provide a Declaration of Interests held in the Company in accordance with ASX Listing Rule 3.19A. Each Director is also provided with a copy of the Company's Share Trading Policy which outlines the Directors obligations should they wish to trade securities.

3. The Company remains satisfied that it has the appropriate policies and procedures in place to capture any compliance requirements in accordance with Listing Rule 3.19B. The Company further considers that this late lodgement of the 3Y's is an isolated incident, however, the Company will revisit its procedures to see if any improvements can be made.

Jerry Monzu

Company Secretary
West Cobar Metals Limited

ENDS



5 September 2024

Reference: 99580

Mr Jerry Monzu
Company Secretary
West Cobar Metals Limited

By email: jerry@monzucorp.com.au

Dear Mr Monzu

West Cobar Metals Limited ('WC1'): Appendix 3Y – Change of Director's Interest Notice Query

ASX refers to the following:

1. WC1's Appendix 3Y lodged on the ASX Market Announcements Platform ('MAP') on 4 September 2024 for Mr Matt Szwedzicki ('Mr Szwedzicki's Notice');
2. WC1's Appendix 3Y lodged on the ASX Market Announcements Platform ('MAP') on 4 September 2024 for Mr Ronald Roberts ('Mr Roberts' Notice') (together, Mr Szwedzicki's Notice and Mr Roberts Notice collectively referred to as the 'Notices');
3. 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.'*
4. 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 Szwedzicki's and Mr Roberts' notifiable interest occurred on 23 August 2024. It appears that the Notices should have been lodged with ASX by 30 August 2024. Consequently, WC1 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's were lodged late.
2. What arrangements does WC1 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 WC1 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 **1:30 PM AWST Tuesday, 10 September 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, WC1'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 WC1 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 WC1'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 WC1's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

In responding to this letter, you should have regard to WC1'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 WC1'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