BOUGAINVILLE
COPPER LIMITED

Company Bilong Yumi

3 March 2026

Ash Aziz
Adviser, Listings Compliance
ASX Limited
Level 50, South Tower, Rialto
525 Collins Street
Melbourne VIC 3000

By email: ListingsComplianceMelbourne@asx.com.au

Dear Ash,

RE: BOUGAINVILLE COPPER LIMITED ('BOC'): APPENDIX 3X – INITIAL DIRECTOR'S INTEREST NOTICE QUERY

BOC refers to your two letters dated 27 February 2026 in relation to Appendix 3Xs lodged for Sir Moi Avei and Peter Graham.

We set out below our consolidated responses to the questions raised in your two letters.

1. Please explain why the Appendix 3Xs for Sir Moi Avei and Peter Graham were lodged late.

The Appendix 3Xs for Sir Moi Avei and Peter Graham were lodged late due to a historical and administrative oversight. It appears that at the time of appointments of Sir Moi Avei and Peter Graham as directors of BOC, no Appendix 3Xs were lodged. Further, no Appendix 3Xs were lodged for the four other directors of BOC (being Sir Melchior Togolo, Maryanne Hasola, James Rutana and Kearnneth Nanei) at the time of the relevant appointments as directors.

The significant oversight was identified only recently in the course of preparing Appendix 3Zs in connection with the resignations of Sir Moi Avei and Peter Graham. During this process, BOC undertook a review of director interest disclosures on ASX and became aware that the Appendix 3Xs for all BOC directors had not been lodged. Upon identifying this issue, BOC acted promptly to prepare and lodge the outstanding Appendix 3Xs for Sir Moi Avei and Peter Graham in order to rectify the position as soon as practicable.

BOC intends to lodge Appendix 3Xs for all remaining directors (being Sir Melchior Togolo, Maryanne Hasola, James Rutana and Kearnneth Nanei) this week.

BOC acknowledges the importance of timely and accurate compliance with Listing Rule 3.19A and recognises that the lodgements of the Appendix 3Xs should have been made at the time of the relevant appointments of directors. BOC sincerely apologises for this significant delay and regrets the failure to comply with its disclosure obligations. BOC is currently reviewing its internal governance and compliance procedures to prevent a recurrence of this issue and to ensure ongoing compliance with the ASX Listing Rules.

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Incorporated in Papua New Guinea A.R.B.N 007 497 869
facebook. https://www.facebook.com/BougainvilleCopper

2. What arrangements does BOC 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?

BOC acknowledges that it did not effectively comply with its obligations under Listing Rule 3.19B and that the failure to lodge the relevant Appendix 3Xs was the result of an administrative oversight by BOC. While directors of BOC were (and are) expected to notify BOC of their relevant interests, and while the required information was provided and collected in accordance with BOC's usual processes, it is acknowledged that the final step of notifying the ASX by lodging the necessary Appendix 3X, was not undertaken.

Since identifying the issue, BOC has reviewed and is strengthening its internal governance and compliance processes to ensure that director interest disclosures are not only obtained promptly on appointment (which they have been and continue to be), however to also ensure that all required disclosures are lodged with ASX within the prescribed timeframes going forward.

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

These steps include implementing an amended director appointment and resignation protocol that specifically requires not only the collection of director interest information but also identifies the lodgement of Appendix 3X, 3Y and 3Z notices within the prescribed timeframes, reinforcing directors' disclosure obligations, and clearly assigning responsibility for monitoring and lodging director interest disclosures with ASX. BOC is committed to putting these measures in place and monitoring them to ensure this issue does not occur again.

We look forward to progressing these matters with you in a timely and constructive manner.

Yours Sincerely,

BOUGAINVILLE COPPER LIMITED

Sir Melchior Togolo
Chairman & Acting Chief Executive Officer

27 February 2026

Mr Mark Wallace Hitchcock
Company Secretary
Bougainville Copper Limited
5th Floor, BSP Haus, Konedobu, Port Moresby, NCD,
Papua New Guinea, 121

By email: mark.hitchcock@bcl.com.pg

Dear Mr Hitchcock

Bougainville Copper Limited ('BOC'): Appendix 3X – Initial Director's Interest Notice Query

ASX refers to the following:

1. BOC's announcement lodged on the ASX Market Announcements Platform ('MAP') on 20 October 2017 confirming the appointment of Mr Peter Graham as a director of BOC;
2. BOC's Appendix 3X lodged on the ASX Market Announcements Platform ('MAP') on 27 February 2026 for Mr Graham (the 'Notice');
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.'

As the Notice indicated that Mr Graham was appointed on 20 October 2017, it appears that the Notice should have been lodged with ASX by 27 October 2017. As the Notice was lodged on 27 February 2026, it appears that BOC may have breached listing rules 3.19A and/or 3.19B. It also appears that Mr Graham may have breached section 205G of the *Corporations Act 2001* (Cth).

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 3X was lodged late.
2. What arrangements does BOC 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 BOC 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 **9 AMAEDT Wednesday, 4 March 2026**. 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, BOC'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 BOC to request a trading halt immediately.

Your response should be sent to me by e-mail at **ListingsComplianceMelbourne@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 BOC'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 BOC's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

In responding to this letter, you should have regard to BOC'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 BOC'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.

Regards

ASX Compliance