VINTAGE ENERGY
ACN 609 200 580

Vintage Energy Ltd
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30 July 2026

Mahnoosh Darabi
Senior Adviser, Listings Supervision
ASX Limited
39 Martin Place
SYDNEY NSW 2000

Dear Mr Darabi

Re: Vintage Energy Ltd (‘VEN’): Appendix 3Y – Change of Director’s Interest Notice Query

We refer to your letter dated 29 July 2026, made under Listing Rule 18.7, regarding VEN’s Appendix 3Y lodged on the ASX Market Announcements Platform (‘MAP’) on 27 July 2026 for Mr Reginald Nelson (the ‘Notice’).

Your letter asks several questions and our responses to those questions are detailed as follows.

1. **Please explain why the Appendix 3Y was lodged late.**
   The late lodgement of the Appendix 3Y arose due to administrative oversight caused when there was a change in staff. The oversight was detected by VEN management as part of a periodic review of procedures.

2. **What arrangements does VEN 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 has arrangements in place with company directors so that acquisitions or disposals of securities are promptly disclosed to company management. In this instance, however, the change in securities was not part of an on-market acquisition, but part of an Entitlement Offer Top-Up facility that was subject to shareholder approval at a general meeting of members. The details of the proposed issue of securities was included within the *Notice Of General Meeting, Explanatory Memorandum, Proxy Form* released to the market on 26 May 2026. The General Meeting poll results were released to the market subsequent to the meeting on 24 June 2026. Subsequent to issue of the securities, the relevant Appendix 2A ‘Application for quotation of securities’ and Appendix 3G ‘Notification of issue, conversion or payment up of unquoted equity securities’ were issued on 26 June 2026. As stated above, the failure to issue the Appendix 3Y release was merely an administrative oversight.

   The company has now updated its procedural checklists used at the time of this type of transaction to ensure such errors around meetings of members and issues of securities do not occur again. The Company will also conduct compliance checks in a more timely manner in future to allow for lodgements to be processed before relevant deadlines have passed.

3. **If the current arrangements are inadequate or not being enforced, what additional steps does VEN intend to take to ensure compliance with Listing Rule 3.19B?**
   The company is aware of its obligations to comply with the ASX Listing Rules generally, and in particular regarding obligations under Listing Rules 3.1 and 3.1A, and accordingly will ensure that company personnel receive adequate training and supervision in regards to those rules, including the ASX guidance notes.

Yours faithfully,

Simon Gray
Company Secretary

29 July 2026

Mr Simon Gray
Company Secretary
Vintage Energy Ltd
58 King William Road
Goodwood SA 5034

By email

Dear Mr Gray

Vintage Energy Ltd ('VEN'): Appendix 3Y – Change of Director's Interest Notice Query

ASX refers to the following:

1. VEN's Appendix 3Y lodged on the ASX Market Announcements Platform ('MAP') on 27 July 2026 for Mr Reginald Nelson (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 Nelson's notifiable interest occurred on 26 June 2026. It appears that the Notice should have been lodged with ASX by 3 July 2026. Consequently, VEN may have breached Listing Rules 3.19A and/or 3.19B. It also appears that Mr Nelson 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 3Y was lodged late.
2. What arrangements does VEN 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 VEN 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 **9:00 AM AEST Monday, 3 August 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, 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 to me by e-mail at **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 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 faithfully

ASX Compliance