For personal use only

14 August 2025

Shane Falconer
Adviser ASX Compliance
Australian Stock Exchange
Via email: ListingsCompliancePerth@asx.com.au

Dear Mr Falconer

RESPONSE TO DIRECTOR'S INTEREST NOTICE QUERY

In relation to your request for information dated 12 August 2025, we provide the following responses to each of your queries numbered the same:

1. The late lodgement was due to an internal administrative oversight. The Appendix 3Y was lodged 1 business day outside the required 5 business days, meaning the Appendix 3Y was lodged outside the timeframe specified by the Listing Rules.

2. The Company and its directors are aware of their obligations under the ASX Listing Rules 3.19A and 3.19B to provide the necessary information for the Company to meet its disclosure requirements. It has systems in place to monitor changes in director's interests in a timely manner. It should be noted that this error was not a result of being unaware of the update of the director's interests, rather an oversight on lodging the Appendix 3Y in a timely manner. The market was kept fully informed via an Appendix 2A notifying the exercise of vested Rights on Friday, 25 July 2025.

3. The Company has reviewed its processes and believe that the Company's disclosure arrangements are adequate and are being enforced. The Company considers this late lodgement to be an isolated incident.

Yours sincerely,

Carol Marinkovich
Company Secretary
Hot Chili Ltd
E: cosec@hotchili.net.au

For personal use only

12 August 2025

Reference: 111643

Mrs Carol Marinkovich
Company Secretary
Hot Chili Limited

By email: carol@hotchili.net.au

Dear Mrs Marinkovich

Hot Chili Limited ('HCH'): Appendix 3Y – Change of Director's Interest Notice Query

ASX refers to the following:

1. HCH's Appendix 3Y lodged on the ASX Market Announcements Platform ('MAP') on 4 August 2025 for Mr Christian Easterday (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 Easterday's notifiable interest occurred on 25 July 2025. It appears that the Notice should have been lodged with ASX by 1 August 2025. Consequently, HCH may have breached Listing Rules 3.19A and/or 3.19B.

For personal use only

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 HCH 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 HCH 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 **2:30 PM AWST Friday, 15 August 2025**. 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, HCH'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 HCH 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 HCH'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 HCH's securities under Listing Rule 17.3.

For personal use only

Listing Rules 3.1 and 3.1A

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