

18 December 2023

Ms Karina So
Adviser, Listings Compliance
ASX

Dear Ms So

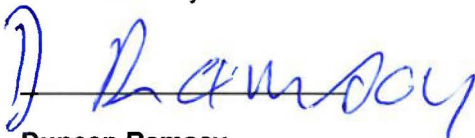
Steadfast Group Ltd (“SDF”): Appendix 3X – Initial Director’s Interest Notice Query.

Thank you for your letter of 12 December 2023.

I respond using the numbering in your letter:

1. The delay in lodgement of the Appendix 3X is unfortunate but arose from an administrative error due to COVID absences that were unexpected and prolonged. We think that Mr Bloore having no SDF shares lessens the error;
2. SDF’s arrangements under Listing Rule 3.19B include letters of appointment with each Non – executive Director requiring disclosure of their holdings. In addition, our share registrar alerts us to changes in Director shareholdings; and
3. We believe that there have been no other late lodgements of Appendix 3X, 3Y or 3Z. While we will continue to monitor compliance, we also believe that, apart from the unexpected prolonged illness, the current arrangements are adequate.

Yours sincerely



Duncan Ramsay
Company Secretary
Steadfast Group Ltd

Steadfast Group Limited

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12 December 2023

Reference: 86112

Mr Duncan Ramsay
Company Secretary
Steadfast Group Limited
Level 4, 99 Bathurst Street
Sydney NSW 2000

By email

Dear Mr Ramsay

Steadfast Group Limited ('SDF'): Appendix 3X – Initial Director's Interest Notice Query

ASX refers to the following:

1. SDF's announcement lodged on the ASX Market Announcements Platform ('MAP') on 15 November 2023 confirming the appointment of Mr Andrew Bloore as a director of SDF effective on 15 November 2023;
2. SDF's Appendix 3X lodged on the ASX Market Announcements Platform ('MAP') on 1 December 2023 for Mr Bloore (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.'

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 Bloore was appointed on 15 November 2023, it appears that the Notice should have been lodged with ASX by 22 November 2023. As the Notice was lodged on 1 December 2023, it appears that SDF may have breached listing rules 3.19A and/or 3.19B. It also appears that Mr Bloore 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.

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2. What arrangements does SDF 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 SDF 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 **9.30 AM AEDT Monday, 18 December 2023**. 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, SDF'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 SDF 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 SDF'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 SDF's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

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

Kind regards

Karina So
Adviser, Listings Compliance