

ASX ANNOUNCEMENT

3D Energi Limited | ASX: TDO

1 April 2026

3D Energi Limited

Continuous Disclosure Policy Review

3D Energi Limited (ACN 105 597 279) (“TDO” or “Company”) advises that it has conducted an internal review of its continuous disclosure policy and procedures, as directed by ASX pursuant to Listing Rule 18.8.

ASX advised TDO of its concerns in respect of the trading halt requested by the Company on 22 January 2026, the voluntary suspension requested by the Company on 27 January 2026, the extension to the voluntary suspension requested by the Company on 13 February 2026 and the Company's responses to ASX's initial concerns in respect of those actions.

Specifically, ASX advised the Company that it was concerned that the Company did not:

- properly assess the need for the trading halt, voluntary suspension or extension to the voluntary suspension prior to making those requests; nor
- properly consider its continuous disclosure obligations under Listing Rule 3.1.

As a result of the matters described above, pursuant to Listing Rule 18.8, ASX directed the Company to conduct an internal review of its policies and procedures relating to compliance with its continuous disclosure obligations under Listing Rule 3.1 and requests for trading halts and voluntary suspensions under Listing Rules 17.1 and 17.2 (in the context of the matters outlined above).

In accordance with ASX's direction, TDO has undertaken an internal review of its disclosure framework and related governance practices to ensure its ongoing and fulsome compliance with the ASX Listing Rules and associated guidance notes. The Company engaged Thomson Geer, an external law firm experienced in continuous disclosure obligations under the ASX Listing Rules and related governance matters, to undertake an independent review and is now in a position to report the findings and recommendations resulting from that review.

Summary of key findings

Following a review of the Company's policies, procedures, and practices concerning its continuous disclosure obligations under the ASX Listing Rules, including its processes for requesting trading halts and voluntary suspensions (“**Disclosure Obligations**”), it was found that the Company's continuous disclosure policy (“**Policy**”) provides a fulsome framework for ensuring compliance with its Disclosure Obligations.

Whilst the Policy was determined to be adequate, some refinements were suggested in relation to the role of the Board and management with respect to compliance with the Company's Disclosure Obligations (including in relation to requesting trading halts and voluntary suspensions). Amendments to the Policy included the following:

- clarification that the Board's responsibility is to oversee the Company's compliance with the Disclosure Obligations, and that the Company's management are responsible for notifying the Board of information that may require disclosure;

- updating and strengthening Company practices in relation to the internal escalation and evaluation procedures for unforeseen events in the context of the Company's Disclosure Obligations; and
- clarification on the responsibilities of the Board and the Company Secretary, including those related to requesting trading halts and voluntary suspensions.

It was recommended that the Company undertake various actions to ensure ongoing compliance with its Disclosure Obligations and continual improvement of internal practices in relation to satisfying its Disclosure Obligations, including the following:

- Provision of a continuous disclosure training session, to be delivered to the Board and senior management by external lawyers, which will cover topics including:
 - the types of circumstances and information which would, and would not, require disclosure to the market and management of disclosure in relation to unexpected events;
 - the application of ASX Guidance Note 16 (Trading Halts and Voluntary Suspensions); and
 - the types of circumstances where it may, and may not, be appropriate for the Company to consider requesting a trading halt or voluntary suspension.
- Regular (internal and external) reviews of the Policy and consideration of whether matters reported or discussed at Board meetings should be disclosed in accordance with the Company's Disclosure Obligations and ongoing monitoring of the Company's compliance with its Disclosure Obligations and the Policy (based on the existing standing agenda item together with consideration of the Company's disclosure register at all Board meetings and senior management meetings in accordance with the Policy).
- Ongoing, and regular (on at least an annual basis) update training for the Board, senior management and relevant officers and employees to assist with their understanding of the Disclosure Obligations, to raise awareness of the internal processes and controls relating to them and promote compliance with the Policy and internal procedures.

The Board reiterates its strong commitment to ensuring timely, accurate and transparent disclosure of all material information to the market and maintaining the highest standard of corporate governance required by a listed entity.

This announcement is authorised for release by the Board of Directors of 3D Energi Limited.

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About 3D Energi

3D Energi Limited is an oil and gas exploration company based in Melbourne, Victoria, with high-impact projects in offshore Victoria and Western Australia. Unless otherwise indicated "the Company", "we", "our", "us" and "3D Energi" are used in this announcement to refer to the business of 3D Energi Limited.