

29 October 2025

ASX Compliance

By Email: ListingsCompliancePerth@asx.com.au

Dear ASX Compliance

Besra Gold Inc. (BEZ) : Listing Rule 3.17A Query Letter

I refer to your letter of 27 October 2025 and respond to your numbered queries as follows:

- 1 No.
- 2 On 12 September 2025 a document purporting to be a request to directors to convene a General Meeting of BEZ pursuant to section 143 of the Canadian Business Corporations Act was sent to BEZ's Australian office signed by various CDI holders. Pursuant to the Canadian Business Corporations Act the right to requisition a meeting of shareholders is afforded only to the registered holders of shares of a corporation that carry the right to vote. None of the signatories of the purported request are registered holders of any shares of BEZ that carry the right to vote. BEZ's Canadian lawyers wrote to each of the signatories of the purported request on 1 October 2025 advising them of this and offering to discuss the matter with the signatories or their legal counsel. BEZ's Canadian lawyers did not hear further from either the signatories or their legal counsel in this regard.
- 3 BEZ is currently in compliance with Listing Rule 3.17A because it has not received a valid notice under the Corporations Act or under any equivalent overseas laws from a holder of securities calling, or requesting the calling of, or proposing to move a resolution at, a General Meeting.
- 4 BEZ confirms it is in compliance with the Listing Rules and in particular Listing Rule 3.1.
- 5 BEZ's response to the questions above have been authorised and approved in accordance with its published Continuous Disclosure Policy.

Yours sincerely

Michael Higginson
Company Secretary
Besra Gold Inc

27 October 2025

Reference: 114210

Mr Michael Higginson
Company Secretary
Besra Gold Inc.

By email:

Dear Mr Higginson

Besra Gold Inc. ('BEZ'): Listing Rule 3.17A Query Letter

ASX refers to the following:

- A. ASX understands that BEZ has received correspondence that purports to be a notice to the directors of BEZ pursuant to section 143 of the Canada Business Corporations Act ('Correspondence').
- B. ASX Listing Rule 3.17A, which states:

An entity must give ASX within two business days of receipt:

- 3.17A.1 *Information about the material terms of any notice it receives under section 249D, 249F, 249N, 252B, 252D or 252L of the Corporations Act or under any equivalent overseas law or equivalent provisions in the entity's constitution from a holder or holders of securities calling, or requesting the calling of, or proposing to move a resolution at, a general meeting; and*
- 3.17A.2 *Information that a notice previously notified to ASX under rule 3.17A.1 has been withdrawn by the holder or holders who gave it.*

- C. Listing Rule 3.1, which requires a listed entity to immediately give ASX any information concerning it that a reasonable person would expect to have a material effect on the price or value of the entity's securities.

Request for information

Having regard to the above, ASX asks BEZ to respond separately to each of the following questions and requests for information:

1. Please confirm if BEZ has received a notice pursuant to section 143 of the Canada Business Corporations Act?
2. If the answer to question 1 is "no", please advise the basis for that view in light of the Correspondence.
3. Please explain how BEZ is currently in compliance with Listing Rule 3.17A?
4. Please confirm that BEZ is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that BEZ's responses to the questions above have been authorised and approved in accordance with its published continuous disclosure policy or otherwise by its board or an officer of BEZ with delegated authority from the board to respond to ASX on disclosure matters.

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 **3:00 PM AWST Wednesday, 29 October 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, BEZ's obligation is to disclose the information 'immediately'. This may require the information to be disclosed before the deadline set out above and may require BEZ to request a trading halt immediately if trading in BEZ's securities is not already halted or suspended.

Your response should be sent by e-mail to **ListingsCompliancePerth@asx.com.au**. It should not be sent directly to the ASX Market Announcements Office. This is to allow us 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.

Suspension

If you are unable to respond to this letter by the time specified above, ASX will likely suspend trading in BEZ's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

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

We reserve 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. The usual course is for the correspondence to be released to the market.

Yours sincerely

ASX Compliance