

29 April 2021

Neel Bhowmick  
Adviser, Listings Compliance (Sydney) The Manager  
Australian Securities Exchange  
20 Bridge Street, Sydney NSW 2000

(By email: ListingsComplianceSydney@asx.com.au)

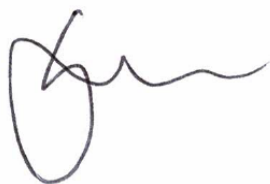
Dear Neil

**BIR Financial Limited ('ASX'): Price – Query**

In reference to your letter of 29 April 2021 regarding the price and volume of the Company's securities, the response to your queries in number order is as follows:

1. No
3. The Company announced on 27 April and again on 28 April 2021 improved performance of its wholly owned subsidiary Pulse Markets following the difficult COVID operating conditions.
4. It is confirmed that the Company is in compliance with the listing rules, and in particular Listing Rule 3.1.
5. It is confirmed that the responses to the questions above have been authorised and approved by an officer of BIR with delegated authority from the board to respond to ASX on disclosure matters.

Yours faithfully

  
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Gregory Starr  
Director and Chief Financial Officer  
BIR Financial Limited



29 April 2021

Reference: 34057

Mr Greg Starr  
Chief Financial Officer  
BIR Financial Limited  
Level 24, Governor Phillip Tower  
Sydney NSW 2000  
By email: greg.starr@tearum.com.au

Dear Mr Starr

**BIR Financial Limited ('BIR'): Price - Query**

ASX refers to the following:

- A. The change in the price of BIR's securities from a low of \$0.012 to a high of \$0.035 today.
- B. The significant increase in the volume of BIR's securities traded today.

**Request for information**

In light of this, ASX asks BIR to respond separately to each of the following questions and requests for information:

1. Is BIR aware of any information concerning it that has not been announced to the market which, if known by some in the market, could explain the recent trading in its securities?
2. If the answer to question 1 is "yes".
  - (a) Is BIR relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in BIR's securities would suggest to ASX that such information may have ceased to be confidential and therefore BIR may no longer be able to rely on Listing Rule 3.1A. Accordingly, if the answer to this question is "yes", you need to contact us immediately to discuss the situation.
  - (b) Can an announcement be made immediately? Please note, if the answer to this question is "no", you need to contact us immediately to discuss requesting a trading halt (see below).
  - (c) If an announcement cannot be made immediately, why not and when is it expected that an announcement will be made?
3. If the answer to question 1 is "no", is there any other explanation that BIR may have for the recent trading in its securities?
4. Please confirm that BIR is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that BIR's responses to the questions above have been authorised and approved under its published continuous disclosure policy or otherwise by its board or an officer of BIR 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 **9:00 AM AEST Friday, 30 April 2021**. You should note that if the information

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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, BIR'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 BIR 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, or if the answer to question 1 is "yes" and an announcement cannot be made immediately, you should discuss with us whether it is appropriate to request a trading halt in BIR'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 BIR's securities under Listing Rule 17.3.

### **Listing Rules 3.1 and 3.1A**

In responding to this letter, you should have regard to BIR'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 BIR'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 a copy of this letter, your reply and any other related correspondence between us to the market under Listing Rule 18.7A.

### **Questions**

If you have any questions in relation to the above, please do not hesitate to contact me.

Yours sincerely

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**Neel Bhowmick**  
Adviser, Listings Compliance (Sydney)