

21 May 2025

ASX Compliance  
Mr Andrew Black

Dear Mr Black,

**INFOMEDIA LTD (IFM) – PRICE QUERY**

We refer to your letter dated 20 May 2025 regarding trading activity in the securities of Infomedia Ltd (ASX: IFM).

In response to your queries, we advise as follows:

**1. Is IFM aware of any information concerning it that has not been announced to the market which, if known by some in the market, could be an explanation for recent trading in its securities?**

The Company is not aware of any information concerning it that has not been released to the market which could reasonably explain the increased volume or decline in the value of its securities on the date in question.

**2. If the answer to question 1 is “yes”:**

Not applicable.

**3. If the answer to question 1 is “no”, is there any other explanation that IFM may have for the recent trading in its securities?**

IFM does not have any explanation for this trading in securities. However, IFM does note an online article reported in the Australian Financial Review after close of market on 20 May 2025, concerning the closure of Celeste Funds and the unwinding of its market positions<sup>1</sup>. Celeste has been a holder of IFM securities, however IFM is unable to advise of Celeste's trading activities in this period.

**4. Please confirm that IFM is complying with the Listing Rules and, in particular, Listing Rule 3.1:**

The Company confirms that it is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.

**5. Please confirm that the Company'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 the Company with delegated authority.**

The Company confirms that its responses above have been authorised and approved in accordance with its published continuous disclosure policy, and has been authorised for release by the Board of Directors.

Yours sincerely,

**Daniel Wall**  
**Chief Operating Officer & Company Secretary**  
[dwall@infomedia.com.au](mailto:dwall@infomedia.com.au)

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<sup>1</sup> <https://www.afr.com/street-talk/small-cap-fund-manager-celeste-to-close-doors-after-mandate-loss-20250520-p5m0sn>



20 May 2025

Reference: 109416

Mr Daniel Wall  
General Counsel & Company Secretary  
Infomedia Ltd  
Level 5  
55 Clarence Street  
Sydney NSW 2000

By email:

Dear Mr Wall

**Infomedia Ltd (‘IFM’): Price - Query**

ASX refers to the following:

- A. The change in the price of IFM’s securities from a close yesterday of \$1.30 to a low of \$1.13 today.
- B. The significant increase in the volume of IFM’s securities traded today.

**Request for information**

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

- 1. Is IFM 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 IFM relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in IFM’s securities would suggest to ASX that such information may have ceased to be confidential and therefore IFM 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 IFM may have for the recent trading in its securities?
- 4. Please confirm that IFM is complying with the Listing Rules and, in particular, Listing Rule 3.1.
- 5. Please confirm that IFM’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 IFM with delegated authority from the board to respond to ASX on disclosure matters.

**When and where to send your response**

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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 AEST Wednesday, 21 May 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, IFM'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 IFM 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 IFM'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 IFM's securities under Listing Rule 17.3.

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

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

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ASX Compliance