



5 March 2024  
Mr Jonathan Bisset  
Senior Advisor Listings Compliance, Melbourne  
Australian Securities Exchange

By email: [ListingsComplianceMelbourne@asx.com.au](mailto:ListingsComplianceMelbourne@asx.com.au)

Dear Mr Bisset

We refer to your letter dated 5 March 2024 and respond as follows using the numbers in your letter under the heading "Request for Information".

1. Is IRE 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? In responding to this question, please consider and address the contents of the News Article.

**RESPONSE: No. Iress is not aware of any such information. In relation to the News Article, Iress is not in discussions or in receipt of a proposal in relation to a potential control transaction for Iress.**

2. If the answer to question 1 is "yes".

- a) Is IRE relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in IRE's securities would suggest to ASX that such information may have ceased to be confidential and therefore IRE 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?

**RESPONSE: Not applicable**

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

**RESPONSE: No**

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

**RESPONSE: Confirmed**

5. Please confirm that IRE'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 IRE with delegated authority from the board to respond to ASX on disclosure matters.

**RESPONSE: Confirmed**

As always, if the ASX requires any further information, please contact me.

Yours sincerely

A handwritten signature in black ink, appearing to read "Michael Bowan". The signature is fluid and cursive, with a large initial "M" and a long, sweeping tail.

Michael Bowan  
Company Secretary  
Iress Limited



5 March 2024

Reference: ODIN90044

Mr Michael Bowan  
Company Secretary  
Iress Limited  
Level 16, 385 Bourke Street  
Melbourne, VIC, 3000

By email

Dear Mr Bowan

**IRESS Limited ('IRE'): Price - Query**

ASX refers to the following:

- A. The change in the price of IRE's securities from \$7.89 at 3:45pm on 5 March 2024 to a high of \$9.06 at 3:55pm on 5 March 2024.
- B. The significant increase in the volume of IRE's securities traded from 396,235 securities traded between commencement of trading and 3:45pm on 5 March 2024 to 685,531 securities traded between 3:45pm and 3:55pm on 5 March 2024.
- C. An article titled '*US PE giant Thoma Brava keeps tabs on Iress, Jarden on scene*' published on the website of the Australian Financial Review at 3:45pm on 5 March 2024 (the 'News Article').

**Request for information**

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

1. Is IRE 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? In responding to this question, please consider and address the contents of the News Article.
2. If the answer to question 1 is "yes".
  - (a) Is IRE relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in IRE's securities would suggest to ASX that such information may have ceased to be confidential and therefore IRE 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 IRE may have for the recent trading in its securities?
4. Please confirm that IRE is complying with the Listing Rules and, in particular, Listing Rule 3.1.

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5. Please confirm that IRE'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 IRE 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 AEDT Wednesday, 6 March 2024**. 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, IRE'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 IRE to request a trading halt immediately.

Your response should be sent to me by e-mail at **ListingsComplianceMelbourne@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 IRE'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 IRE's securities under Listing Rule 17.3.

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

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

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Yours sincerely

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ASX Compliance