

24 March 2025

Vanessa Nevjestic  
Senior Adviser, Listings Compliance  
ASX Limited  
Level 40, Central Park  
152-158 St Georges Terrace  
Perth WA 6000

Dear Vanessa

**Rent.com.au Limited (“RNT” or “the Company”)**

I refer to your letter received by email on 21 March 2025 regarding Appendix 3Y – Change of Director’s Interest Notice Query. In response to your query, we advise as follows:

**1. Please explain why the Appendix 3Y was lodged late.**

Mr McDonagh purchased shares on-market on 19 November 2024 and notified the Company on the same day in accordance with Company policy. An Appendix 3Y was lodged on 20 November 2024 for the purchase of 384,615 RNT ordinary shares.

An additional purchase of 38,461 ordinary shares on the same order, but included on a separate confirmation notice, was inadvertently overlooked by Mr McDonagh and not notified to the Company until the discrepancy was detected on 20 March 2025, whereupon the Company immediately announced the additional Appendix 3Y.

**2. What arrangements does RNT have in place under Listing Rule 3.19B with its directors to ensure that it is able to meet its disclosure obligations under Listing Rule 3.19A?**

All directors are fully aware of the notification requirements regarding changes of interests and the Company’s Securities Trading Policy and Continuous Disclosure Policy. In this instance, Mr McDonagh followed the requirements of the Company policies, and it was inadvertent that the actual number of shares purchased was greater than the amount advised because there were two separate trade confirmations.

**3. If the current arrangements are inadequate or not being enforced, what additional steps does RNT intend to take to ensure compliance with Listing Rule 3.19B?**

The Company considers its current arrangements to be adequate. Nonetheless, an additional reconciliation will be conducted by the Company Secretary before the lodgement of any Appendix 3Y to ensure the completeness of any lodgement.

Jan Ferreira  
CFO & Company Secretary



21 March 2025

Reference: ODIN107467

Mr Jan Ferreira and Ms Karen Koh  
Joint-company secretaries  
Rent.com.au Limited  
Level 1, 3 Craig Street  
Burswood, Western Australia 6100

By email: janf@rent.com.au  
karenk@rent.com.au

Dear Mr Ferreira

**Rent.com.au Limited ('RNT'): Appendix 3Y – Change of Director's Interest Notice Query**

ASX refers to the following:

1. RNT's Appendix 3Y lodged on the ASX Market Announcements Platform ('MAP') on 21 March 2025 for Mr Sam McDonagh (the 'Notice');
2. Listing Rule 3.19A which requires an entity to tell ASX the following:

3.19A.1 *'The notifiable interests of a director of the entity (or in the case of a trust, a director of the responsible entity of the trust) at the following times.*

- *On the date that the entity is admitted to the official list.*
- *On the date that a director is appointed.*

*The entity must complete Appendix 3X and give it to ASX no more than 5 business days after the entity's admission or a director's appointment.*

3.19A.2 *A change to a notifiable interest of a director of the entity (or in the case of a trust, a director of the responsible entity of the trust) including whether the change occurred during a closed period where prior written clearance was required and, if so, whether prior written clearance was provided. The entity must complete Appendix 3Y and give it to ASX no more than 5 business days after the change occurs.*

3.19A.3 *The notifiable interests of a director of the entity (or in the case of a trust, a director of the responsible entity of the trust) at the date that the director ceases to be a director. The entity must complete Appendix 3Z and give it to ASX no more than 5 business days after the director ceases to be a director.'*

3. Listing rule 3.19B which states that:

*'An entity must make such arrangements as are necessary with a director of the entity (or in the case of a trust, a director of the responsible entity of the trust) to ensure that the director discloses to the entity all the information required by the entity to give ASX completed Appendices 3X, 3Y and 3Z within the time period allowed by listing rule 3.19.A. The entity must enforce the arrangements with the director.'*

The Notice indicates that a change in Mr McDonagh's notifiable interest occurred on 21 November 2024. It appears that the Notice should have been lodged with ASX by 28 November 2024. Consequently, RNT may have

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breached Listing Rules 3.19A and/or 3.19B. It also appears that Mr McDonagh may have breached section 205G of the *Corporations Act 2001* (Cth).

### **Request for Information**

Under Listing Rule 18.7, we ask that you answer each of the following questions having regard to Listing Rules 3.19A and 3.19B and *Guidance Note 22: Director Disclosure of Interests and Transactions in Securities - Obligations of Listed Entities*.

1. Please explain why the Appendix 3Y was lodged late.
2. What arrangements does RNT have in place under Listing Rule 3.19B with its directors to ensure that it is able to meet its disclosure obligations under Listing Rule 3.19A?
3. If the current arrangements are inadequate or not being enforced, what additional steps does RNT intend to take to ensure compliance with Listing Rule 3.19B?

### **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 AWST Wednesday, 26 March 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, RNT'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 RNT to request a trading halt immediately.

Your response should be sent to me by e-mail at [ListingsCompliancePerth@asx.com.au](mailto:ListingsCompliancePerth@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, you should discuss with us whether it is appropriate to request a trading halt in RNT'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 RNT's securities under Listing Rule 17.3.

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**Listing Rules 3.1 and 3.1A**

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