

25 March 2024

Your ref: 91010

ASX Compliance  
ASX Limited  
**By email: ListingsComplianceSydney@asx.com.au**

Dear Sir/Madam,

**MoneyMe Limited (MME): Query in relation to compliance with Listing Rules 3.1 and 15.7**

I refer to your letter dated 19 March 2024. MME's responses to the questions contained in the letter are set out below.

**1. Did MME, or anyone representing MME, provide a statement or information to the media concerning the information in the Article?**

Yes, information concerning the matters contained in the Article was provided by MME's media advisor to a journalist at the Australian Financial Review (**AFR**).

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

**(a) please provide a copy of that correspondence (not for release to the market);**

The information was provided to the AFR verbally by MME's media advisor and no correspondence is able to be provided. The information provided was to the following effect:

- MME has extended its Autopay warehouse facility capacity from \$375 million to \$750 million.
- The warehouse terms also return approximately \$10 million of cash to the business.
- The business has returned from an international non-deal roadshow to potential investors in Asia and Europe, where it tested interest in investment in its warehouses.

**(b) explain when (time and date), and by whom, the information was first provided to the media;**

Information was provided by MME's media advisor in a discussion with an AFR journalist on Monday, 18 March 2024 at approximately 11.20am.

This followed a verbal instruction from MME at approximately 11.15am to its media advisor to brief the AFR with the information, but regrettably there was not a clear instruction given to wait until the ASX announcement had been released before discussing with the AFR journalist.

**(c) does MME consider this to be compliant with Listing Rule 15.7? If so, please explain the basis for that view?**

MME acknowledges that the provision of the information that was for release to the market was not compliant with Listing Rule 15.7.

**3. If the answer to question 1 is “no”, is there any other explanation as to how the information appeared in the Article?**

Not applicable.

**4. What arrangements does MME have in place to ensure compliance with Listing Rule 15.7?**

MME has in place a Disclosure Policy, published on its website, which governs the manner in which the company seeks to ensure the market is kept fully informed of information that may have a material effect on the price or value of MME’s securities.

Pursuant to the Disclosure Policy, the disclosure of price-sensitive information is subject to a clearly defined approval process. MME has a Disclosure Committee comprising members of the Board, executive staff and the Company Secretary. The Committee, or alternatively MME’s Board of Directors, must approve any proposed announcement to ASX before it is given to ASX. Once approval for an announcement is given, MME’s Company Secretary is instructed to lodge the announcement with ASX and will then confirm to the Committee and Board members that this has occurred. MME’s Disclosure Policy explains Listing Rule 15.7 and provides that MME must not release information that is for release to the market to any person until it has given the information to ASX and has received acknowledgment that ASX has released the information to the market.

All employees and directors of MME are made aware of the Disclosure Policy. Employees are required to acknowledge in writing that they have read and understood the policy, and any updates made to the policy from time to time.

MME also has in place a Code of Conduct, which is published on its website. The Code of Conduct, among other things, requires MME employees to take steps to protect and not improperly disclose confidential information. The Code of Conduct also contains reference to MME’s Disclosure Policy. As is the case with the company’s Disclosure Policy, all employees and directors of MME are made aware of the Code of Conduct and employees are required to acknowledge in writing that they have read and understood the Code.

MME has a written agreement in place with its media advisor. Relevantly, the agreement contains a confidentiality clause which provides that all information passing between the parties must be treated as confidential and may only be disclosed by a party with the prior written approval of the other party.

**5. In light of the Article, what additional steps will MME take to ensure compliance with Listing Rule 15.7?**

MME takes seriously its continuous disclosure obligations and regrets that an error of this

nature has occurred.

MME will take the following additional steps to ensure compliance with Listing Rule 15.7:

- implement an improved process for communications between MME and its media advisor whereby instructions from MME in relation to the timing of media briefings must be provided in writing, to ensure that no price-sensitive information is released to the media (or any other third party) before that information has been released to the market via ASX (and MME has received confirmation from ASX that this has occurred);
- conduct training for MME directors and relevant employees and MME's media advisor to refresh all parties' knowledge of continuous disclosure laws, the relevant Listing Rules and the requirements of MME's Disclosure Policy.

**6. Please confirm MME's responses to the above have been authorised and approved in accordance with its published continuous disclosure policy or otherwise by its board or an officer of MME with delegated authority from the board to respond to ASX on disclosure matters.**

The responses set out in this letter have been authorised and approved by MME's Disclosure Committee, in accordance with MME's Disclosure Policy.

Yours sincerely,  
**MoneyMe Limited**



Jonathan Swain  
Company Secretary



19 March 2024

Reference: 91010

Mr Jonathan Swain  
Company Secretary  
Company Matters  
12, 680 George Street  
SYDNEY NSW 2000

By email:

Dear Mr Swain

**MoneyMe Limited ('MME'): Query in relation to compliance with Listing Rules 3.1 and 15.7**

ASX refers to the following:

- A. The article appearing in the Australian Financial Review titled *"MoneyMe on international roadshow for new ABS deal"* published online at **11:47 AM AEDT** on 18 March 2024 (the 'Article') which included the following statements:

*"...[MME] is understood to have secured a top-up at its \$375 million warehouse facility to originate car loans under its Autopay product."*

*"Lenders have approved a doubling of the Autopay warehouse size of \$750 million. It is understood MoneyMe has also negotiated cheaper cost of debt, reflecting sobering interest rate rise sentiment, and will add about \$10 million of cash back into the business."*

- B. MME's announcement titled *"MONYEME Expands Funding Capacity"* released on the ASX Market Announcements Platform ('MAP') at **11:58 AM AEDT** on 18 March 2024 (the 'Announcement') which included the following statements:

*"...[MME] is pleased to announce the extension of its MME Autopay 2021 warehouse funding facility with terms that double the facility from \$375m to \$750m."*

*"The agreement included financing of channel commissions related to loan originations in the structure, which has released just over \$10m of unrestricted cash into the business."*

- C. Listing Rule 3.1 which states:

*"Once an entity is or becomes aware of 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, the entity must immediately tell ASX that information"*

- D. Listing Rule 15.7 which states:

*"An entity must not release information that is for release to the market to any person until it has given the information to ASX and has received an acknowledgment that ASX has released the information to the market."*

- E. The note to Listing Rule 15.7 which states:

*"Note: This rule prohibits an entity giving information to the media even on an embargoed basis."*

As the Article was published prior to the Announcement being released on MAP, it appears that MME may have breached Listing Rules 3.1 and/or 15.7.

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## Request for Information

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

1. Did MME, or anyone representing MME, provide a statement or information to the media concerning the information in the Article?
2. If the answer to question 1 is “yes”:
  - 2.1. please provide a copy of that correspondence (not for release to the market);
  - 2.2. explain when (time and date), and by whom, the information was first provided to the media; and
  - 2.3. does MME consider this to be compliant with Listing Rule 15.7? If so, please explain the basis for that view.
3. If the answer to question 1 is “no”, is there any other explanation as to how the information appeared in the Article?
4. What arrangements does MME have in place to ensure compliance with Listing Rule 15.7?
5. In light of the Article, what additional steps will MME take to ensure compliance with Listing Rule 15.7?
6. Please confirm MME’s responses to the above have been authorised and approved in accordance with its published continuous disclosure policy or otherwise by its board or an officer of MME with delegated authority from the board to respond to ASX on disclosure matters.

ASX expects MME to make reasonable enquiries to put itself in a position to answer the questions above.

## 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 Monday, 25 March 2024**. Your response should be sent by email to [ListingsComplianceSydney@asx.com.au](mailto:ListingsComplianceSydney@asx.com.au). It should not be sent directly to the ASX Market Announcements Office.

## 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.

Kind regards

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ASX Compliance