



5 May 2025

Dean Litis
ASX Compliance Pty Ltd
Melbourne VIC

Dear Dean

ASX Price Query Response

Spenda Limited (Company) refers to your attached letter dated 5 May 2025. Using the numbering in your letter the Company responds as follows:

1. No, the Company is not aware of any such information. As referenced on page four of the Company's quarterly activities report released to ASX on 30 April 2025, the Company is in the process of confidential negotiations in relation to various proposed agreements for the provision of virtual cards/funding services, however, no terms have been agreed to date and there is currently no certainty in relation to the timing or completion of these proposed agreements.
2. Not applicable given response to question 1.
3. No.
4. The Company is in compliance with the ASX Listing Rules. In particular, ASX Listing Rule 3.1.
5. Confirmed, authorised by the Board.

Yours faithfully

Justyn Stedwell
Company Secretary
On behalf of the Board of Spenda Limited



www.spenda.co
Spenda Limited
ASX:SPX
ACN 099 084 143
investors@spenda.co

Part G, Building B, The Garden Office Park, 355 Scarborough Beach Road, Osborne Park, WA, 6017



5 May 2025

Reference: ODIN108889

Mr Justyn Stedwell
Company Secretary
Spenda Limited

By email

Dear Mr Stedwell

Spenda Limited ('SPX'): Price - Query

ASX refers to the following:

- A. The change in the price of SPX's securities from a close of \$0.0055 to a high of \$0.008 at the time of writing today.
- B. The significant increase in the volume of SPX's securities traded today.

Request for information

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

- 1. Is SPX 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 SPX relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in SPX's securities would suggest to ASX that such information may have ceased to be confidential and therefore SPX 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 SPX may have for the recent trading in its securities?
- 4. Please confirm that SPX is complying with the Listing Rules and, in particular, Listing Rule 3.1.
- 5. Please confirm that SPX'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 SPX 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 **2:00 PM AEST Monday, 5 May 2025**. 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, SPX'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 SPX 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 SPX'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 SPX's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

In responding to this letter, you should have regard to SPX'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 SPX'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 faithfully

ASX Compliance