

ASX Compliance

Level 50, South Tower, Rialto
525 Collins Street
Melbourne VIC 3000

6 February 2026

By email: ListingsComplianceMelbourne@asx.com.au

Dear ASX Compliance

Re: Web Travel Group Limited (ASX:WEB) – Price Query

Web Travel Group Limited (**WEB**) refers to your letter dated 6 February 2026 (**Letter**). Please see our responses below to each of your questions in the Letter, using the same definitions and numbering as in the Letter.

1. **Is WEB 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 in particular whether WEB is aware of any information that its earnings for the 12 month period ending on 31 March 2026:

- (a) are likely to differ materially (downwards or upwards) from any earnings guidance it has given for the period; or
- (b) if WEB has not given any earnings guidance for the period, are otherwise likely to come as a surprise to the market (by reference to analyst forecasts for the period)?

No.

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

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

Not applicable.

3. **If the answer to question 1 is “no”, is there any other explanation that WEB may have for the recent trading in its securities? In answering this question, please confirm that WEB maintains the view that the Announcement is not market sensitive under Listing Rule 3.1.**

WEB maintains the view that the Announcement is not market sensitive under Listing Rule 3.1. The tax audit has been covered by Spanish media, and the purpose of the Announcement was to proactively inform the market, rather than reactively address investor queries arising from the coverage. This audit was initiated yesterday. WEB does not have any other explanation for the recent trading in its securities.

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

Confirmed.

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

Confirmed.

Yours sincerely



Ella Zhao
Group General Counsel & Company Secretary

Web Travel Group Limited

6 February 2026

Ella Zhao
Company Secretary
Web Travel Group Limited
Level 12
440 Collins Street
Melbourne 3000

By email

Dear Ella

Web Travel Group Limited ('WEB')- Price Query

ASX refers to the following:

- A. WEB's announcement lodged and released on the ASX Market Announcements Platform pre-open today, titled '*Receipt of audit notice*' which was not marked-'market sensitive' and stated that the Special Delegation of the Balearic Islands of the Spanish Tax Agency had commenced an audit of WEB's subsidiary in respect of both direct and indirect taxes over certain recent periods ('Announcement').
- B. The change in the price of WEB's securities from a high of \$3.81 to a low of \$2.475 today.
- C. The significant increase in the volume of WEB's securities traded today.

Request for information

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

1. Is WEB 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 in particular whether WEB is aware of any information that its earnings for the 12 month period ending on 31 March 2026:

- (a) are likely to differ materially (downwards or upwards) from any earnings guidance it has given for the period; or
- (b) if WEB has not given any earnings guidance for the period, are otherwise likely to come as a surprise to the market (by reference to analyst forecasts for the period)?

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

- (a) Is WEB relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in WEB's securities would suggest to ASX that such information may have ceased to be confidential and therefore WEB 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 WEB may have for the recent trading in its securities? In answering this question, please confirm that WEB maintains the view that the Announcement is not market sensitive under Listing Rule 3.1.
4. Please confirm that WEB is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that WEB’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 WEB 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 **3:00 PM AEDT Friday, 6 February 2026**. 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, WEB’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 WEB 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 WEB’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 WEB’s securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

In responding to this letter, you should have regard to WEB’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 WEB’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