



26 March 2024  
Jonathan Bisset  
Senior Adviser  
Listings Compliance  
ASX Limited  
By email

Dear Mr Bisset

**Catapult Group International Ltd (CAT): Price Query**

We refer to your letter of today and respond as follows.

1. **Is CAT 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?**

No.

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

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

As ASX has noted, Catapult can experience low levels of liquidity in CAT securities and movements in the share price can, from time to time, be exacerbated by low levels of liquidity in CAT securities.

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

Catapult is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.

5. **Please confirm that CAT’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 CAT with delegated authority from the board to respond to ASX on disclosure matters.**

These responses have been authorised and approved by the Executive Chairman of Catapult, Dr Adir Shiffman.

Yours sincerely

A handwritten signature in black ink, appearing to read "Adir Shiffman".

**Dr Adir Shiffman**  
Executive Chairman  
Catapult Group International Ltd

For personal use only



26 March 2024

Reference: ODIN91554

Mr Jonathan Garland  
Company Secretary  
Catapult Group International Ltd

By email

Dear Mr Garland

**Catapult Group International Ltd ('CAT'): Price - Query**

ASX refers to the following:

- A. The change in the price of CAT's securities from \$1.315 at commencement of trading to a high of \$1.545 today.
- B. The significant increase in the volume of CAT's securities traded today from 140,072 securities traded on 25 March 2024 to 830,260 securities traded from commencement of trading to approximately 1:00pm AEDT on 26 March 2024.

**Request for information**

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

1. Is CAT 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 CAT relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in CAT's securities would suggest to ASX that such information may have ceased to be confidential and therefore CAT 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 CAT may have for the recent trading in its securities?
4. Please confirm that CAT is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that CAT'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 CAT with delegated authority from the board to respond to ASX on disclosure matters.

For personal use only

---

### 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 **3:30 PM AEDT Tuesday, 26 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, CAT'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 CAT 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 CAT'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 CAT's securities under Listing Rule 17.3.

### Listing Rules 3.1 and 3.1A

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

---

ASX Compliance