

**BY EMAIL:** ListingsComplianceMelbourne@asx.com.au

**Attn:** Mr Dale Wang  
Adviser  
ASX Listings Compliance (Melbourne)  
Rialto Towers  
525 Collins Street  
Melbourne Vic 3000

**Webjet Group Limited**  
Level 2, 509 St Kilda Road  
Melbourne, Victoria 3004 Australia  
ACN 679 116 762  
www.webjetgroup.com  
ASX:WJL

09 May 2025

Dear Mr Wang

### Price query

I refer to your letter of 8 May 2025.

For ease of reference, terms used in this letter and not otherwise defined have the meaning given in your letter.

Our responses to your requests for information is set out below, using the numbering and headings in your letter.

**1. Is WJL 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?**

WJL became aware after market close of an undisclosed buyer seeking to acquire up to 5.0% of the shares in WJL (excluding current interest) representing approximately 19.6 million shares in WJL at a fixed cash price of \$0.80 per share, with the ability to increase the offer size at the buyer's discretion. The undisclosed buyer is said to have an undisclosed interest below 5%.

**In responding to this question, please consider in particular whether WJL is aware of any information that its earnings for the 12 month period ending on 31 March 2025:**

- (a) are likely to differ materially (downwards or upwards) from any earnings guidance it has given for the period; or
- (b) if WJL 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 or, if WJL is not covered by analysts, its earnings for the prior corresponding period)?

WJL is not aware of any such information.

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

- (a) **Is WJL relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1?**

No.

Please note that the recent trading in WJL's securities would suggest to ASX that such information may have ceased to be confidential and therefore WJL 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).**

The only information of which WJL is aware is as set out in the answer to question 1.

- (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 WJL may have for the recent trading in its securities?**

Not applicable.

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

WJL considers that it is complying with the Listing Rules including Listing Rule 3.1.

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

Confirmed.



**Meaghan Simpson**  
General Counsel and Company Secretary

**Webjet Group Limited**



8 May 2025

Reference: 109033

Ms Meaghan Simpson  
General Counsel and Company Secretary  
Webjet Group Limited  
Level 2, 509 St Kilda Road  
Melbourne VIC 3004

By email

Dear Ms Simpson

**Webjet Group Limited ('WJL'): Price - Query**

ASX refers to the following:

- A. The change in the price of WJL's securities from an open of \$0.640 to a high of \$0.785 today.
- B. The significant increase in the volume of WJL's securities traded today.

**Request for information**

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

1. Is WJL 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 WJL is aware of any information that its earnings for the 12 month period ending on 31 March 2025:

- (a) are likely to differ materially (downwards or upwards) from any earnings guidance it has given for the period; or
  - (b) if WJL 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 or, if WJL is not covered by analysts, its earnings for the prior corresponding period)?
2. If the answer to question 1 is "yes".
    - (a) Is WJL relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in WJL's securities would suggest to ASX that such information may have ceased to be confidential and therefore WJL 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 WJL may have for the recent trading in its securities?

- 
4. Please confirm that WJL is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that WJL'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 WJL 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 **9AM AEST Friday, 9 May 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, WJL'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 WJL 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 WJL'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 WJL's securities under Listing Rule 17.3.

#### **Listing Rules 3.1 and 3.1A**

In responding to this letter, you should have regard to WJL'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 WJL'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.

Kind regards

---

ASX Compliance

For personal use only