



11 April 2024

Yulia Gurdina
Adviser, Listings
ASX Limited
Exchange Centre
20 Bridge Street
Sydney NSW 2000

By email: ListingsComplianceSydney@asx.com.au

Dear Ms Gurdina

BlueBet Holdings Ltd (ASX: BBT) – Response to ASX Price Query

BlueBet Holdings Ltd (ACN 647 124 641) (**BlueBet** or **BBT**) responds to ASX's price query letter dated 10 April 2024 (**ASX Letter**).

In response to each of the questions raised in the ASX Letter, BlueBet responds as follows:

1. *Is BBT 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?*

*Yes. BBT confirms that, at the time of receipt of the price and volume query from ASX, BBT was aware of information concerning it that had not been announced to the market which, if known by some in the market, could explain the recent trading in its securities referred to in the ASX letter. This information related to BBT's proposed acquisition of NTD Pty Ltd's (ACN 658 859 262) (**betr**) wagering business and the associated equity capital raising proposed to be conducted by BBT (the **Proposed Transaction**).*

*BBT understands that an article appeared in the online edition of the Australian Financial Review (**AFR**) at or around 2.58pm on the afternoon of 10 April 2024 titled "Betr, BlueBet poised to strike merger deal in major wagering shakeup" (**Article**).*

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

- a. *Is BBT relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1?*

Prior to the publication of the Article, BBT confirms that it was relying on Listing Rule 3.1A as the basis for not announcing the Proposed Transaction under Listing Rule 3.1, as the information related to an incomplete proposal or negotiation which was confidential.

However, upon becoming aware of the loss of confidentiality in the information, BBT promptly contacted ASX to request a trading halt in its securities on the basis that it no longer considered it could rely on Listing Rule 3.1A.

- b. *Can an announcement be made immediately?*

Yes. Please refer to the announcement lodged by BBT with the ASX on 11 April 2024 entitled 'BlueBet announces transformational merger with betr; launches \$20.0 million Equity Raising.'

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

Not Applicable.

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

The Company confirms it is complying with the Listing Rules and, in particular, Listing Rule 3.1.

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

This response has been authorised and approved by William Richmond (Managing Director and Chief Executive Officer).

Yours sincerely

Laura Newell
Company Secretary
BlueBet Holdings Ltd



10 April 2024

Reference: ODIN92182

Ms Laura Newell
Company Secretary
BlueBet Holdings Ltd
Level 8 210 George Street
SYDNEY NSW 2000

By email

Dear Ms Newell

BlueBet Holdings Ltd ('BBT'): Price Query

ASX refers to the following:

- A. The change in the price of BBT's securities from a low of \$0.23 to a high of \$0.33 today, 10 April 2024.
- B. The significant increase in the volume of BBT's securities traded today, 10 April 2024.

Request for information

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

1. Is BBT 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 BBT relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in BBT's securities would suggest to ASX that such information may have ceased to be confidential and therefore BBT 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 BBT may have for the recent trading in its securities?
4. Please confirm that BBT is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that BBT'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 BBT 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 **9:00 AM AEST on Thursday, 11 April 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, BBT'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 BBT to request a trading halt immediately.

Your response should be sent to me by e-mail at **ListingsComplianceSydney@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 BBT'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 BBT's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

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

Regards

ASX Compliance