



23 September 2024

Mr Dale Allen
Manager, Listings Compliance
ASX
152-158 St Georges Terrace
Perth WA 6000

Dear Mr Allen,

**Intelligent Monitoring Group Limited ('Company' or 'IMB')
Compliance with Listing Rule 15.7**

Generally, the Company would like to affirm its understanding of Listing Rules 3.1 and 15.7, and confirm its commitment to comply with the Listing Rules in its dealings with ASX and the market.

Indeed, in relation to the specific matters raised by Listings Compliance, the Company has ensured that earnings guidance was regularly provided and updated to the market through ASX, as circumstances changed. In this case, the Company had committed to participating in a Webinar (Coffee Microcaps FY2024 Results Webinar), which was to occur on 30 August following the anticipated release of the 2024 results the previous evening. When those results were not finalised in time, the company sought cover through a Trading Halt, to protect the market until the results and the IMB FY 2024 Full Year Results Presentation ('Investor Presentation') could be released later that day, and the lifting of the Trading Halt was requested. At no time was the market uninformed. The presentation itself contained no new announcements.

In relation to the specific Request for Information, the Company provides the following, using the ASX request numbering:

1. Yes, Mr Hambling delivered the Investor Presentation, subsequently released to the market, during the Webinar on 30 August 2024. No copies were circulated to attendees, or anyone else.
2. N/A
3. As explained above, once it became obvious that the Company was not going to be able to release its Appendix 4E and Annual Audited Accounts, and therefore the Investor Presentation, to ASX prior to the commencement of the Webinar, the

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Company requested a Trading Halt. There was nothing new in the Investor Presentation that hadn't previously been disclosed in earlier guidance releases, but the Company was simply ensuring that no information was being released or discussed during an active market. The delay was simply caused by the Company's admin functions and Tax advisers being based in Perth, so not able to finalise final steps prior to the ASX market opening in Sydney.

There was no new information being released, and certainly no details that wouldn't be covered when the Investor Presentation and Results were released, so no breach of Listing Rule 3.1. The presentation went ahead at 9:30am AEST, prior to the Market open, and following the Trading Halt request.

4. Yes, Mr Hambling spoke to the Investor Presentation at the Webinar.
5. No, the Investor Presentation was not made available to Webinar participants.
6. Yes, the Investor Presentation was released to the market via MAP on 30 August 2024 at 16:21 AEST, together with the Annual Results release and the Company's Appendix 4E and Audited Accounts for the year ended 30 June 2024. Following the market close, the Company requested that the Trading Halt be lifted in time for the commencement of trading on Monday 2 September.
7. The Company believes that it has complied with the spirit of Listing Rules 3.1 and 15.7, inasmuch as at the time of the Webinar no trading in the Company's securities was possible. Nor would it be possible until the release of the material listed above, and the lifting of the Trading Halt. All information was in the market at that time, and the market remains fully informed.

Technically, the Company may have breached its own Governance Policy, to the extent that the Webinar proceeded before the Investor Presentation was released. But did so under the cover afforded by the Trading Halt, and released the necessary information prior to the lifting of the Trading Halt. Every effort will be made to ensure the Company does not place itself in this position again.

8. The Company considers that it has rigorous policies and procedures in place to ensure compliance with the Listing Rules generally, LR 3.1 and 15.7 specifically, and a commitment by the Company and its officers to ensure a fully informed market at all times. The move to request a Trading Halt, when there was a possibility that those commitments might be breached because of timing issues, is further evidence of this.
9. The Company confirms that it is in compliance with Listing Rules 3.1 and 15.7, in all respects. No further release is required.
10. The above responses have been approved by the Company in accordance with its Continuous Disclosure Policy, and with the full authorisation of the Board. The Board



is fully aware of its obligations and hence the specific determination to request a Trading Halt on that date is an indication of the intent of the Board's decision to ensure the market is able to trade fully informed and free from any suggestion of non-disclosure. Hence the Board is comfortable it has upheld its obligations of full market disclosure, and ensuring the market could not trade until such disclosures were made.

Prepared and released with the authority of the Board of IMB

Yours faithfully

A handwritten signature in black ink, appearing to read "Neil A Green", written in a cursive style.

Neil A Green
Company Secretary



19 September 2024

Reference: 99486

Mr Neil Green
Company Secretary
Intelligent Monitoring Group Limited

By email

Dear Mr Green

Intelligent Monitoring Group Limited ('IMB'): Compliance with Listing Rule 15.7

ASX refers to the following:

- A. IMB's announcement entitled 'IMB – Coffee Microcaps Presentation link' released to the ASX Market Announcements Platform ('MAP') on 28 August 2024 which disclosed the following:

'IMG Managing Director, Mr Dennison Hambling, will participate in a FY2024 results presentation. The session is targeted at the Company's shareholders, but is also available to our employees, and the broader market if they are interested.

The session is conducted in the format of a Webinar by Coffee Microcaps, and will take place on Friday 30 August 2024, with Dennison's presentation commencing at 9:30am EDST [sic].

The structure of the session will comprise a 20 minute presentation via slides, with the opportunity for a short 10 minute Q&A session thereafter. Presentation slides will be released at the commencement of the session.'

('Coffee Microcaps FY2024 Results Webinar')

- B. IMB's request for a trading halt in its securities, released to MAP at 9:45 AM AEST on 30 August 2024 pending IMB finalising 'the accounting treatment of a beneficial tax input in relation to its 30 June 2024 balance sheet to enable it to complete its Appendix 4E and Annual Report'.
- C. IMB's announcement entitled 'IMB Appendix 4E and Annual Report' released to MAP at 4:21 PM AEST on 30 August 2024.
- D. IMB's announcement entitled 'IMB FY 2024 Full Year Results Presentation' released to MAP at 4:21 PM AEST on 30 August 2024.
- E. Listing Rule 3.1 which states:
- "Once an entity is or becomes aware of any information concerning it that a reasonable person would expect to have a material effect on the price or value of the entity's securities, the entity must immediately tell ASX that information"*
- F. Listing Rule 15.7 which states:
- "An entity must not release information that is for release to the market to any person until it has given the information to ASX and has received an acknowledgment that ASX has released information to the market."*
- G. The note to Listing Rule 15.7 which states:
- "Note: This rule prohibits an entity giving information to the media even on an embargoed basis."*

- H. IMB's Continuous Disclosure Policy, available on its website¹, in its Corporate Governance Plan, which includes the following:

'The Company must comply with continuous disclosure requirements arising from legislation and the ASX Listing Rules. The general rule, in accordance with ASX Listing Rule 3.1, is that once the Company becomes aware of any information concerning it that a reasonable person would expect to have a material effect on the price of value or the Company's securities, the Company must immediately disclose that information to the ASX...

Any new and substantive investor or analyst presentation will be released on the ASX Market Announcements Platform ahead of the presentation. Where practicable, the Company should consider providing shareholders the opportunity to participate in such presentations.'

Request for information

Having regard to the above, ASX asks IMB to respond separately to each of the following questions:

1. Did Mr Hambling present IMB's FY 2024 results at the Coffee Microcaps Webinar on 30 August 2024?
2. If the answer to question 1 is 'no', please provide details regarding the nature of Mr Hambling's presentation at the Coffee Microcaps Webinar?
3. If the answer to question 1 is 'yes', please explain how IMB considers Mr Hambling complied with Listing Rules 3.1, 15.7 and IMB's continuous disclosure policy given IMB's Annual Report for FY 2024 was not released to MAP until 4:21 PM AEST on 30 August 2024.
4. Did Mr Hambling use presentation slides when presenting at the Coffee Microcaps Webinar?
5. Were presentation slides provided to Webinar participants of Mr Hambling's presentation?
6. Have the Webinar presentation slides or slides containing the information presented in the Webinar been subsequently released to the market? If so, please provide details, including the date and time the presentation slides were released on MAP.
7. If the answer to question 6 is 'yes', please explain how IMB considers it complied with Listing Rules 3.1, 15.7 and IMB's continuous disclosure policy given IMB's Annual Report for FY 2024 and Full Year Results Presentation were not released to MAP until 4:21 PM AEST on 30 August 2024?
8. Does IMB consider its current policies and procedures are adequate to ensure compliance with the ASX Listing Rules, including Listing Rule 3.1 and 15.7? Please advise the basis for IMB's view.
9. Please confirm that IMB is in compliance with the Listing Rules and, in particular, Listing Rule 3.1 and 15.7.
10. Please confirm that IMB's responses to the questions above have been authorised and approved in accordance with its published continuous disclosure policy or otherwise by its board or an officer of IMB 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 AWST Tuesday, 24 September 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, IMB's obligation is to disclose the information 'immediately'. This may require the information to be disclosed before the

¹ <https://intelligentmonitoringgroup.com/wp-content/uploads/2022/03/Threat-Protect-Australia-Limited-Corporate-Governance-Plan.pdf>

deadline set out above and may require IMB to request a trading halt immediately if trading in IMB's securities is not already halted or suspended.

Your response should be sent by e-mail to **ListingsCompliancePerth@asx.com.au**. It should not be sent directly to the ASX Market Announcements Office. This is to allow us to review your response to confirm that it is in a form appropriate for release to the market, before it is published on the MAP.

Suspension

If you are unable to respond to this letter by the time specified above, ASX will likely suspend trading in IMB's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

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

We reserve 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. The usual course is for the correspondence to be released to the market.

Yours sincerely

ASX Compliance