



15 October 2024

Mr Stuart Roberts
Adviser
Listings Compliance
Australian Securities Exchange

Dear Mr Roberts

Re ASX Price Query

I refer to the questions listed in your letter dated 15 October 2024 referring to the change in the price of Tyro Payment Limited's (**Tyro** or **TYR**) securities and the increase in the volume of Tyro's securities trading from 14 October 2024 to 15 October 2024.

In response to the questions in your letter (using the same numbering), I respond as follows:

1. Tyro is not 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. Not applicable.
3. As set out in Tyro's ASX Announcement on 15 October 2024 titled '*Tyro welcomes card payment surcharging review; invitation to market briefing*' Tyro is aware of:
 - ongoing political commentary regarding a proposed ban on the surcharging of debit card transactions by merchants in Australia; and
 - the RBA Review of Merchant Card Payment Costs and Surcharging released on 15 October 2024 (**RBA Review**).

Tyro anticipates that a combination of these explains the recent trading in its securities.

Tyro is still considering the RBA Review and the proposals contained therein. The RBA has invited interested stakeholders to provide written submissions by 3 December 2024. The RBA has noted that a detailed assessment of submissions received will be made and that there will be further consultation on any reform proposals. Tyro currently intends to make a submission to the RBA Review.

4. I confirm that Tyro is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.
5. I confirm that the responses in this letter to the ASX's questions have been authorised and approved by Tyro's CEO and Managing Director in accordance with Tyro's published continuous disclosure policy.

Yours sincerely

Sami Wilson
General Counsel
Tyro Payments Limited



15 October 2024

Reference: 101515

Mr Sami Wilson
General Counsel
Tyro Payments Limited
L18/55 Market St, Sydney, NSW 2000

By email: swilson@tyro.com

Dear Mr Wilson

Tyro Payments Limited ('TYR'): Price - Query

ASX refers to the following:

- A. The change in the price of TYR's securities from a high of \$0.905 to a low of \$0.783, from the close of trading yesterday, 14 October 2024, to today.
- B. The significant increase in the volume of TYR's securities traded from yesterday, 14 October 2024 to today, 15 October 2024.

Request for information

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

1. Is TYR 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 TYR relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in TYR's securities would suggest to ASX that such information may have ceased to be confidential and therefore TYR 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 TYR may have for the recent trading in its securities?
4. Please confirm that TYR is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that TYR'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 TYR 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 **2 PM AEDT Tuesday, 15 October 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, TYR'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 TYR 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 TYR'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 TYR's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

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

CC: Jay Amigh, TYR