



14 October 2025

ASX Listings Compliance

ListingsComplianceSydney@asx.com.au

**Halo Technologies Holdings Limited ('HAL' or the Company)**

We refer to your letter to the Company dated 14 October 2025 entitled **Halo Technologies Holdings Limited ('HAL')**: Price - Query.

We respond to each of your queries as follows (adopting your numbering):

- 1. Is HAL 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?**

The Company is not aware of any information that could explain the recent trading in its securities.

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

- a. Is HAL relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in HAL's securities would suggest to ASX that such information may have ceased to be confidential and therefore HAL 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.**

Not Applicable

- 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).**

Not Applicable

- c. If an announcement cannot be made immediately, why not and when is it expected that an announcement will be made?**

Not Applicable

- 2. If the answer to question 1 is "no", is there any other explanation that HAL may have for the recent trading in its securities?**

HAL has no other explanation.

- 3. Please confirm that HAL 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.

4. Please confirm that HAL'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 HAL with delegated authority from the board to respond to ASX on disclosure matters.

This response has been authorised by the Chief Executive Officer Peter Oxlade on behalf of the Board of Directors.

For further information please contact: Reuben Goodsell Chief Financial Officer

E: [r.goodsell@halo-technologies.com](mailto:r.goodsell@halo-technologies.com)

#### About HALO

HALO is an online global equities research and trade execution software solution that brings sophisticated institutional-grade analytical frameworks and market insights to everyday investors. HALO includes two distinct and integrated offerings in HALO Global, designed for hands on investors who want professional grade tools without the cost, and HALO Trading which offers global trade execution capability and ready-made themed investment portfolios that are ideal for 'low touch' and 'values based' investors and SMSFs.

For further information, please visit: [www.halo-technologies.com/](http://www.halo-technologies.com/)

14 October 2025

Reference: 113670

Ms Eryl Baron  
Company Secretary  
Boardroom Pty Limited  
Level 8, 210 George Street  
Sydney NSW 2000

By email

Dear Ms Baron

**Halo Technologies Holdings Ltd ('HAL'): Price - Query**

ASX refers to the following:

- A. The change in the price of HAL's securities from a low of \$0.025 on 13 October 2025 to an intraday high of \$0.065 today.
- B. The significant increase in the volume of HAL's securities traded from 3 October 2025 to 14 October 2025.

**Request for information**

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

1. Is HAL 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?

If the answer to question 1 is "yes".

- (a) Is HAL relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in HAL's securities would suggest to ASX that such information may have ceased to be confidential and therefore HAL 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?
2. If the answer to question 1 is "no", is there any other explanation that HAL may have for the recent trading in its securities?
  3. Please confirm that HAL is complying with the Listing Rules and, in particular, Listing Rule 3.1.
  4. Please confirm that HAL'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 HAL with delegated authority from the board to respond to ASX on disclosure matters.

**When and where to send your response**

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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 **1:30 pm AEDT Tuesday, 14 October 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, HAL'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 HAL 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 HAL'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 HAL's securities under Listing Rule 17.3.

### Listing Rules 3.1 and 3.1A

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

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ASX Compliance