13 December 2019

Ms Penelope Reid
Adviser, Listings Compliance (Perth)
Level 40, Central Park, 152-158 St Georges Terrace,
Perth WA 6000

Dear Penelope,

## RESPONSE TO PRICE AND VOLUME QUERY

Rent.com.au Limited (ASX: **RNT**) ("**RNT**" or "**the Company**"), refers to your letter dated 12 December 2019 in relation to the change in the price of RNT's securities from a low of $0.038 on 10 December 2019 to a high of $0.059 on 12 December 2019 and the significant increase in the volume of RNT's securities traded from 9 December 2019 to 12 December 2019.

We provide the following responses to your specific queries (the numbers below correspond to the numbers on the query received):

**1. Is RNT 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?**

No, the Company is not aware of any information concerning it that has not been released to market which, if known by some in the market, could explain the recent trading in its securities.

**2. n/a**

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

Yes, the Company believes a sequence of recent positive announcements; the buying activity of a now substantial shareholder; and interest generated by the subsequent ASX release of "Becoming a Substantial Shareholder" have contributed to the trading activity the subject of the ASX Price and Volume Query.

A summary of these events is provided below:

- 30 October 2019 – New Move, Now Pay Later Product Launch announced;
- 29 November 2019 – CEO's AGM Presentation included:
  - Record levels of customer engagement;
  - RNT app now #1 rated real-estate app in both Apple and Google stores (slides 14-15);
  - Record EBITDA performance for Q1 FY20 (slide 23);
  - Future products and product changes to be released:
    - RentConnect (slide 13 and 21) – coming soon is a significant change and new partner aiming to launch ahead of new year rush;
    - RentPay (slides 25-30) – market size and indicative future earnings potential;
  - Provided forecast earnings guidance for current Half Year (slide 23);
- 6-10 December 2019 – Buying activity by well-regarded fund manager (*4.2m shares*);
- 11 December 2019 – Becoming a Substantial Holder notice to ASX;

As foreshadowed in the AGM presentation, RNT is in the process of overhauling the RentConnect product involving a new exclusive arrangement with a utility provider. RNT does not believe that this overhaul in the RentConnect product through this arrangement is material.

Because RNT is small and is tightly held (less than 1,000 shareholders), it typically has low daily share trade volumes. The recent "Becoming a Substantial Holder" notice by a respected fund manager detailed the buying that this party had recently undertaken, and this may have had the effect of lifting RNT's profile. The lodgement of the substantial shareholder notice may have also had the effect of attracting further new investors.

To put recent trading in context, buying activity on 12 December 2019 resulted in a price change of 21.7% even though the total value of shares that were traded on the ASX was only approximately $125,000.

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

   RENT confirms that it is in compliance with the Listing Rules and, in particular Listing Rule 3.1.

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

   The Company confirms that this letter and the responses above have been authorised and approved by the Board.

Yours sincerely

Jan Ferreira
Company Secretary

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12 December 2019

Mr Jan Ferreira
Company Secretary
Rent.com.au Limited
GPO Box 2543
PERTH WA 6001

By email: janf@rent.com.au

Dear Mr Ferreira

**Rent.com.au Limited ('RNT'): Price and Volume Query**

We note the change in the price of RNT's securities from a low of $0.038 on 10 December 2019 to a high of $0.059 today, 12 December 2019.

We also note the significant increase in the volume of RNT's securities traded from 9 December 2019 to today, 12 December 2019.

**Request for Information**

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

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

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

5. Please confirm that RNT'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 RNT 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 AWST today Thursday, 12 December 2019**. If we do not have your response by then, ASX will likely suspend trading in RNT's securities under Listing Rule 17.3. 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, RNT'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.

ASX reserves the right to release a copy of this letter and your response on the ASX Market Announcements Platform under Listing Rule 18.7A. Accordingly, your response should be in a form suitable for release to the market. Your response should be sent to me by e-mail at **ListingsCompliancePerth@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.

**Listing Rules 3.1 and 3.1A**

Listing Rule 3.1 requires a listed entity to give ASX immediately 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. Exceptions to this requirement are set out in Listing Rule 3.1A. In responding to this letter, you should have regard to RNT'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 RNT'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.

**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 RNT'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 may 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 RNT's securities under Listing Rule 17.3.

**Enquiries**

If you have any queries or concerns about any of the above, please contact me immediately.

Yours sincerely

**Penelope Reid**
Adviser, Listings Compliance (Perth)