

# Neurotech

5 June 2019

James Rowe  
Manager, Listing Compliance (Perth)  
Australian Securities Exchange  
Level 40, Central Park  
152 St Georges Terrace  
PERTH WA 6000  
BY EMAIL: james.rowe@asx.com.au

Dear James

## Neurotech International Limited (ASX: NTI) - PRICE QUERY

We refer to your letter dated 5 June 2019 querying the recent trading of NTI shares. In response to your questions outlined in the letter, we provide the following information:

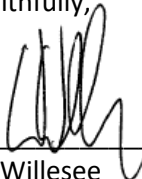
1. The Company is not aware of any information concerning it that has not been announced to the market which, if known by some in the market, could explain the recent trading in the Company's securities.
2. Not applicable.
3. The Company has recently undergone a Board renewal and indicated a targeted focus on the best possible outcomes for shareholders, this process is continuing. The Board notes the volatile nature of trading in its securities since the Board renewal in April 2019.

Further the Board notes its announcement of this morning noting the launch of its online clinic and confirms that the launch of the clinic is not a price sensitive event.

4. The Company confirms it is in compliance with the Listing Rules, in particular Listing Rule 3.1.
5. The Company confirms its responses to the above questions have been authorised by an officer with delegated authority to respond to such matters.

Please do not hesitate to contact me if further information is required.

Yours faithfully,



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Winton Willesee  
Non-Executive Director

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## Neurotech International Ltd

ABN 73 610 205 402  
Suite 5 CPC, 145 Stirling Highway  
Nedlands, Western Australia 6009  
[www.neurotechinternational.com](http://www.neurotechinternational.com)

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5 June 2019

Mr Winton Willesee  
Director  
Neurotech International Limited

By email

Dear Mr Willesee

### **Neurotech International Limited ('NTI'): Price and Volume Query**

We note the change in the price of NTI's securities from a low of \$0.012 on 3 June 2019 to an intra-day high of \$0.037 at the time of writing today, 5 June 2019.

We also note the significant increase in the volume of NTI's securities traded during this period as well.

ASX also notes the announcement titled 'Neurotech launches Mente Clinic' lodged on ASX Market Announcements Platform today, marked as non-sensitive by NTI.

### **Request for Information**

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

1. Is NTI 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 NTI relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in NTI's securities would suggest to ASX that such information may have ceased to be confidential and therefore NTI 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 NTI may have for the recent trading in its securities?
4. Please confirm that NTI is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that NTI'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 NTI 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 **11:00 AM AWST today Wednesday, 5 June 2019**. If we do not have your response by then, ASX will likely suspend trading in NTI'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

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not fall within the exceptions mentioned in Listing Rule 3.1A, NTI'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](mailto: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 NTI'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 NTI'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 NTI'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 NTI'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

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**James Rowe**  
Manager, Listings Compliance (Perth)