



5 August 2020

Mr Dean Litis  
Principal Adviser, Listings Compliance  
ASX Compliance Pty Ltd  
Level 4, North Tower  
525 Collins Street  
Melbourne VIC 3000

By email

Dear Mr. Litis,

### **CPT Global Limited (CGO) – Price Query**

CGO refers to your letter of 5 August 2020 regarding a change in the price of CGO's securities from a close of \$0.10 on 28 July 2020 (when securities were last traded) to an intraday high of \$0.23 on 5 August 2020 and the increase in the volume of CGO's securities traded on 5 August 2020.


CGO provides the following responses to your letter.

1. *Is CGO 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. CGO will announce results for the 2020 financial year later this month. The net profit before tax announced will be consistent with information previously announced to the market.

2. *If the answer to question 1 is "yes".*
  - a. *Is CGO relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in CGO's securities would suggest to ASX that such information may have ceased to be confidential and therefore CGO 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?*

Not Applicable

 +61 3 9684 7900

 3/818 Bourke Street, Docklands, VIC 3008

 [www.cptglobal.com](http://www.cptglobal.com)



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

CGO is a thinly traded security and closely held. Historically, the share price has been volatile with low value trades resulting in significant price movements. However, CGO is unable to confirm that the change in price and increase in volume was specifically related to this or any other factor.

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

This is confirmed.

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

These responses have been authorised and approved under CGO's published continuous disclosure policy.

Please feel free to contact me if you would like to discuss these responses further.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Grant Sincock', written over a white background.

Grant Sincock  
Chief Financial Officer and Company Secretary  
CPT Global Limited



5 August 2020

Reference: ODIN21926

Mr Grant Sincock  
Company Secretary  
CPT Global Limited  
3/818 Bourke Street  
Docklands VIC 3008

By email

Dear Mr Sincock

**CPT Global Limited ('CGO'): Price - Query**

ASX refers to the following:

- A. The change in the price of CGO's securities from a close of \$0.10 on 28 July 2020 (when the securities were last traded) to an intraday high of \$0.23 at the time of writing today.
- B. The significant increase in the volume of CGO's securities traded today.

**Request for information**

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

1. Is CGO 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 CGO relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in CGO's securities would suggest to ASX that such information may have ceased to be confidential and therefore CGO 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 CGO may have for the recent trading in its securities?
4. Please confirm that CGO is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that CGO'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 CGO 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 **9:30 AM AEST Thursday, 6 August 2020**. 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, CGO'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 CGO to request a trading halt immediately.

Your response should be sent to me by e-mail at **ListingsComplianceMelbourne@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 CGO'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 CGO's securities under Listing Rule 17.3.

### Listing Rules 3.1 and 3.1A

In responding to this letter, you should have regard to CGO'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 CGO'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 a copy of this letter, your reply and any other related correspondence between us to the market under Listing Rule 18.7A.



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**Questions**

If you have any questions in relation to the above, please do not hesitate to contact me.

Yours sincerely

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**Dean Litis**

Principal Adviser, Listings Compliance (Melbourne)

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