

14 August 2020

Ms Sandra Wutete  
Senior Advisor, Listings Compliance (Perth)  
ASX Limited  
Level 40, Central Park  
152-158 St Georges Terrace  
PERTH WA 6000

By email: ListingsCompliancePerth@asx.com.au

Dear Sandra

**ADVERTITAS LIMITED ("COMPANY"): PRICE QUERY**

I refer to your letter to the Company dated 14 August 2020 in relation to the change in price and trading volume of the Company's securities (your letter).

Utilising the numbering in your letter, the Company responds as follows:

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 its securities.
2. Not applicable.
3. The Company has no other explanation for the recent trading in the Company's securities, however it does draw attention to the strong traction across all marketing channels and pricing models which was noted in the Company's recent June 2020 Quarterly Activities Report released to ASX on 31 July 2020. In addition to the momentum gained during the June 2020 quarter in the Freemium subscriber conversions, the Company also noted the enterprise-level sales pipelines continue to build, driven by both the direct sales team and referral partner introductions.
4. The Company confirms that it has, at all times, complied with, and continues to comply with the ASX Listing Rules and in particular, Listing Rule 3.1.
5. This response has been authorised and approved by the Board.

Yours faithfully



**Susan Hunter**  
Company Secretary

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**For more information, please contact:**

**Investor Enquiries**

Mathew Ratty  
Chief Executive Officer  
Adveritas Limited  
(08) 9473 2500  
[investor.enquiry@adveritas.com.au](mailto:investor.enquiry@adveritas.com.au)

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14 August 2020

Reference: 22493

Ms Susan Hunter  
Company Secretary  
Adveritas Limited

By email

Dear Ms Hunter

### **Adveritas Limited ('AV1'): Price - Query**

ASX refers to the following:

- A. The change in the price of AV1's securities from a low of \$0.084 on Wednesday, 12 August 2020 to an intra-day high at the time of writing this letter of \$0.12 today.
- B. The significant increase in the volume of AV1's securities traded from 12 August 2020 to 14 August 2020.

### **Request for information**

In light of this, ASX asks AV1 to respond separately to each of the following questions and requests for information:

1. Is AV1 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 AV1 relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in AV1's securities would suggest to ASX that such information may have ceased to be confidential and therefore AV1 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 AV1 may have for the recent trading in its securities?
4. Please confirm that AV1 is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that AV1'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 AV1 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 **3:30 PM AWST Friday, 14 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

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within the exceptions mentioned in Listing Rule 3.1A, AV1'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 AV1 to request a trading halt immediately.

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.

### **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 AV1'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 AV1's securities under Listing Rule 17.3.

### **Listing Rules 3.1 and 3.1A**

In responding to this letter, you should have regard to AV1'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 AV1'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.

### **Questions**

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

Yours sincerely

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**Sandra Wutete**

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Senior Adviser, Listings Compliance (Perth)