

22 September 2017

Lisa Banh  
Senior Listings Adviser  
ASX Compliance Pty Ltd  
20 Bridge St  
SYDNEY NSW 2000

Dear Lisa

**RESPONSE TO PRICE QUERY**

I refer to your letter to Invion Limited (Company) dated 22 September 2017, and respond to your questions 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 be an explanation for recent trading in the securities of the Company. The Company has considered this question in the context of earnings guidance. The Company notes that it does not provide earnings guidance and confirms that, on 31 August 2017, it lodged full year statutory accounts for the year ended 30 June 2017.
2. In light of 1. above, not applicable.
3. Aside from information that is in the public domain, including announcements dated 31 August 2017 and 5 September 2017 regarding a strategic transaction, the Company does not have any other explanation for the recent trading of its securities.
4. The Company is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.
5. The Company confirms that its responses provided above have been authorised and approved in accordance with its published continuous disclosure policy and by an officer of the Company with delegated authority from the Board to respond to ASX on disclosure matters.

Yours sincerely



Melanie Farris  
Company Secretary & Head of Operations



22 September 2017

Melanie Farris  
Head of Operations & Company Secretary  
Invion Limited  
GPO Box 1557  
Brisbane QLD 4001

By email: [Melanie.Farris@inviongroup.com](mailto:Melanie.Farris@inviongroup.com)

Dear Ms Farris

**Invion Limited ("IVX"): price query**

We note the change in the price of IVX's securities from an open of \$0.3 to a high of \$0.4 today on 22 September 2017.

We also note the significant increase in the volume of IVX's securities traded today on 22 September 2017.

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

1. Is IVX 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?

In responding to this question, please consider in particular whether IVX is aware of any information that its earnings for the 12 month period ending on 30 June 2017;

- a) are likely to differ materially (downwards or upwards) from any earnings guidance it has given for the period; or
- b) if IVX has not given any earnings guidance for the period, are otherwise likely to come as a surprise to the market (by reference to analyst forecasts for the period or, if IVX is not covered by analysts, its earnings for the prior corresponding period)?

2. If the answer to question 1 is "yes":

- a) Is IVX relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1?

Please note that the recent trading in IVX's securities would suggest to ASX that such information may have ceased to be confidential and therefore IVX 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 IVX may have for the recent trading in its securities?
4. Please confirm that IVX is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that IVX’s responses to the questions above have been authorised and approved in accordance with its published continuous disclosure policy or otherwise by its board or an officer of IVX 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, and in accordance with, Listing Rule 18.7. Your response is required as soon as reasonably possible and, in any event, **by no later than 3.30pm (AEST) on 22 September 2017**. If we do not have your response by then, ASX will have no choice but to consider suspending trading in IVX’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, IVX’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 [lisa.banh@asx.com.au](mailto:lisa.banh@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 IVX’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 IVX’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 IVX’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*.

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

Yours sincerely

*[Sent electronically without signature]*

Lisa Banh  
Senior Listings Adviser  
P: (02) 9227 0000