

Mr. Alex Sutton Compliance Adviser, Listings Compliance (Sydney) ASX Compliance Pty Limited 20 Bridge Street Sydney NSW 2000 8 April 2019

Price Query

Dear Alex

We refer to the ASX Price Query dated 8 April 2019 and respond as follows:

- 1. The Company is not aware of any information concerning it that would, if known by some in the market, explain the recent trading in its securities.
- 2. Not Applicable.
- 3. The Company is not aware of any other explanation for the recent trading in its securities other than to refer to the recent acquisition of AIC Investment Corporation Pty Ltd and a 50% interest in BNNT Technology Ltd. This acquisition secures an opportunity for PPK to participate in the bulk scale production and commercialisation of Boron Nitride Nanotubes (BNNT) which are light weight and are considered to be stronger than high-strength steel and industrial-grade carbon fibre.

This transaction was first announced on 13 November 2018 and completion of the acquisition occurred and was announced on 22 March 2019 following shareholder approval at an Extraordinary General Meeting on 15 March 2019.

- 4. The Company believes that it is in compliance with ASX Listing Rule 3.1.
- 5. The Company's responses to the ASX Price Query dated 8 April 2019 have been authorised and approved by the Company's Executive Chairman who has been delegated authority from the Board to respond to the ASX on disclosure matters.

Please do not hesitate to contact me if you require any additional information in relation to this matter.

Yours sincerely

Andrew J. Cooke Company Secretary

PPK GROUP LIMITED

ABN: 65 003 964 181



8 April 2019

Mr Andrew Cooke Company Secretary PPK Group Limited Level 27 10 Eagle St Brisbane QLD 4000

By email:

Dear Mr Cooke

PPK Group Limited ('PPK'): Price Query

We note the change in the price of PPK's securities from a low of \$1.04 on Wednesday, 3 April 2019 to a high of \$1.50 today.

Request for Information

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

- 1. Is PPK 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 PPK relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in PPK's securities would suggest to ASX that such information may have ceased to be confidential and therefore PPK 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 PPK may have for the recent trading in its securities?
- 4. Please confirm that PPK is complying with the Listing Rules and, in particular, Listing Rule 3.1.
- 5. Please confirm that PPK'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 PPK 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 AEST today Monday**, **8 April 2019**. If we do not have your response by then, ASX will likely suspend trading in PPK'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, PPK'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 <u>ListingsComplianceSydney@asx.com.au</u>. 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 PPK'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 PPK'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 PPK'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 PPK's securities under Listing Rule 17.3.

Enquiries

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

Kind regards

Alex Sutton

Alex Sutton

Compliance Adviser, Geology, Listings Compliance (Sydney)