

Zoono Group Limited

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25 November 2019

Ms. Lin Kang
Adviser, Listings Compliance (Sydney)
ASX Compliance Pty Ltd
Via Email: ListingsComplianceSydney@asx.com.au

Dear Lin

Zoono Group Limited ('ZNO'): Price Query

We refer to your letter dated 22 November 2019 in relation to the change in ZNO's share price and increase in volume of securities traded between 20 November and 22 November 2019 and confirm as follows:

1. ZNO is not aware of any information concerning it that has not been announced to the market which, if known by some of the market could explain the recent trading in securities.

ZNO reminds the market of what has previously been announced. ZNO has signed new distributors globally, a number of trials are currently underway and ZNO is in negotiations with several parties, however there is nothing material to announce at this time.

2. N/A
3. ZNO is not aware of any other explanation for the recent trading in its securities.
4. ZNO confirms it is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.
5. I confirm the above responses have been authorised and approved by ZNO's board.

Yours sincerely

ZOONO GROUP LIMITED

Elissa Hansen
Company Secretary



22 November 2019

Reference: 10987

Ms Elissa Hansen
Company Secretary
Zoono Group Limited
Level 12
225 George Street
SYDNEY NSW 2000

By email

Dear Ms Hansen

Zoono Group Limited ('ZNO'): Price Query

We note the change in the price of ZNO's securities from a low of \$0.205 on Wednesday 20 November 2019 to a high of \$0.31 today, Friday 22 November 2019.

We also note the significant increase in the volume of ZNO's securities traded over this period.

Request for Information

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

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

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5. Please confirm that ZNO'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 ZNO 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 AEDT on Monday, 25 November 2019**. If we do not have your response by then, ASX will likely suspend trading in ZNO'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, ZNO'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 ListingsComplianceSydney@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 ZNO'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 ZNO'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 ZNO'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 ZNO'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

Lin Kang
Adviser, Listings Compliance (Sydney)