

14 June 2024

Zufishan Anjum  
20 Bridge Street  
Sydney NSW 2000

Sent by email: [ListingsComplianceSydney@asx.com.au](mailto:ListingsComplianceSydney@asx.com.au)

Dear Zufishan,

### **LBT Innovations Limited (ASX:LBT) – Response to ASX Price and Volume Query**

We refer to your letter dated 13 June 2024 regarding an increase in the price and volume of trading in the securities of LBT Innovations Limited (“**Company**”) and respond to your queries as follows:

- 1. Is LBT 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.

- 2. If the answer to question 1 is “yes”:**

- a. Is LBT relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in LBT’s securities would suggest to ASX that such information may have ceased to be confidential and therefore LBT 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.**

N/A.

- 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).**

N/A.

- c. If an announcement cannot be made immediately, why not and when is it expected that an announcement will be made?**

N/A.

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

The Company lodged an announcement with the ASX on the morning of 13 June 2024 which, after further consultation with the ASX, the Company formed the view that it was not market sensitive and withdrew the announcement. The Company believes that the resulting pause in trading and the lift of the pause in trading announcements to the ASX on 13 June 2024 may have resulted in speculation causing the recent increase in trading in its securities. The Company does not consider the volume of securities being traded to be material.

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

The Company confirms it is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.

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

The Company confirms that its responses to the questions above have been authorised and approved by the Board of the Company.

Yours sincerely,



Ray Ridge  
**Company Secretary**



13 June 2024

Reference: 95753

Mr Ray Ridge  
Company Secretary  
LBT Innovations Limited

By email: ray.ridge@lbtinnovations.com

Dear Mr Ridge

### **LBT Innovations Limited ('LBT'): Price - Query**

ASX refers to the following:

- A. The change in the price of LBT's securities from a low of \$0.014 to a high of \$0.02 today.
- B. The significant increase in the volume of LBT's securities traded from 12 June 2024 to 13 June 2024.

### **Request for information**

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

1. Is LBT 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 LBT relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in LBT's securities would suggest to ASX that such information may have ceased to be confidential and therefore LBT 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 LBT may have for the recent trading in its securities?
4. Please confirm that LBT is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that LBT'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 LBT 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 **4:30 PM AEST Thursday, 13 June 2024**. 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, LBT'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 LBT to request a trading halt immediately.

Your response should be sent by e-mail at [ListingsComplianceSydney@asx.com.au](mailto: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.

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

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

In responding to this letter, you should have regard to LBT'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 LBT'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**

ASX reserves the right to release all or any part of this letter, your reply and any other related correspondence between us to the market under Listing Rule 18.7A.

Yours sincerely

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ASX Compliance