



23 March 2020

Dean Litis  
Principal Adviser, Listings Compliance (Melbourne)  
Level 4, 525 Collins St  
Melbourne VIC 3000

By email only: [dean.litis@asx.com.au](mailto:dean.litis@asx.com.au)

Dear Dean

**KNeoMedia Limited (the Company)**

We refer to your letter to the Company dated today, 23 March 2020 regarding the recent increase in the price of the Company's securities from a low of \$0.008 on 18 March to a high of \$0.02 earlier today.

The Company notes as a general comment that in light of the social distancing measures being introduced in response to the COVID-19 outbreak, the Company is receiving a greater level of enquiries for its online story based and game assessment learning products in all of the Company's international markets. The Company will continue to keep the market advised of any material developments that arise from these enquiries.

We respond to each of your queries as follows (adopting your numbering):

- 1. Is KNM 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?**

The Company is not aware of any information that could explain the recent trading in its securities.

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

- a. Is KNM relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1?**

Not Applicable

- b. Can an announcement be made immediately?**

Not Applicable

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

Not Applicable

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



The Company is not aware of any matter that would have affected the recent trading in its securities other than as previously noted that the Company's online education programs are potentially in greater demand as a result of more students studying from home.

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

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

We trust this information addresses your concerns.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Sophie Karzis", with a stylized flourish at the end.

Sophie Karzis  
**Company Secretary**



23 March 2020

Reference: ODIN15898

Ms Sophie Karzis  
Company Secretary  
KNeoMedia Limited  
Level 9, 401 Collins Street  
Melbourne VIC 3000

By email:

Dear Ms Karzis

### **KNeoMedia Limited ('KNM'): Price Query**

We note the change in the price of KNM's securities from a low of \$0.008 on 18 March 2020 to a high of \$0.02 at the time of writing today.

We also note the significant increase in the volume of KNM's securities traded today.

### **Request for Information**

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

1. Is KNM 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 KNM relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in KNM's securities would suggest to ASX that such information may have ceased to be confidential and therefore KNM 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 KNM may have for the recent trading in its securities?
4. Please confirm that KNM is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that KNM'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 KNM 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 **2:00 PM AEDT today, Monday, 23 March 2020**. If we do not have your response by

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then, ASX will likely suspend trading in KNM'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, KNM'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 [ListingsComplianceMelbourne@asx.com.au](mailto:ListingsComplianceMelbourne@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 KNM'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 KNM'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 KNM'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 KNM's securities under Listing Rule 17.3.

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**Enquiries**

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

Yours sincerely

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**Dean Litis**

Principal Adviser, Listings Compliance (Melbourne)