

15 February 2021

Mr Dean Litis
Senior Adviser – Listings Compliance (Sydney)
ASX Compliance Pty Ltd
20 Bridge Street
SYDNEY NSW 2000

Dear Sir

PRICE QUERY

We refer to your letter dated 15 February 2021.

1. Is NOV 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?

Response: No

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

Response: N/A

3. Is there any other explanation that NOV may have for the recent trading in its securities?

Response: Novatti notes that the Payments and Fintech sectors globally have seen significant growth and re-rating by markets, in particular as a result of COVID-19 and the rapid digital transformation of payments and financial services. Novatti’s business has continued to grow strongly, as announced in the recent Quarterly Update which highlighted major business and financial progress, including:

- New record quarterly sales revenue of \$3.79m, up 52% year-on-year, highlighting consistent, long term growth
- New record half yearly sales revenue of \$7.35m, 49% higher year-on-year, as first half total revenue hits \$8.2m
- Core payment processing business achieving seventh consecutive quarter of record revenue
- Past investment in platforms delivering strong and consistent growth as new partnerships, including UnionPay, Google Pay, Samsung Pay, providing leverage for the business to scale
- Capital applied to accelerate growth as current strategy remains fully-funded with \$9m in cash as at 31 December 2020.

4. Please confirm NOV is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.

Response: Confirmed

5. Please confirm that NOV's responses to the questions above have been authorized and approved.

Response: Confirmed

Yours sincerely



Ian Hobson
Company Secretary



15 February 2021

Reference: ODIN30846

Mr Ian Hobson
Company Secretary
Novatti Group Limited
Level 3, 461 Bourke Street
Melbourne VIC 3000

By email

Dear Mr Hobson

Novatti Group Limited ('NOV'): Price - Query

ASX refers to the following:

- A. The change in the price of NOV's securities today from a low (and opening price) of \$0.27 to a high of \$0.34 at the time of writing today.
- B. The significant increase in the volume of NOV's securities traded today.

Request for information

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

- 1. Is NOV 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 NOV relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in NOV's securities would suggest to ASX that such information may have ceased to be confidential and therefore NOV 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 NOV may have for the recent trading in its securities?
- 4. Please confirm that NOV is complying with the Listing Rules and, in particular, Listing Rule 3.1.
- 5. Please confirm that NOV'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 NOV 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, 15 February 2021**. 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, NOV'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 NOV to request a trading halt immediately.

Your response should be sent to me by e-mail at **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.

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 NOV'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 NOV's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

In responding to this letter, you should have regard to NOV'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 NOV'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

We reserve the right to release a copy of this letter, your reply and any other related correspondence between us to the market under Listing Rule 18.7A.



Questions

If you have any questions in relation to the above, please do not hesitate to contact me.

Yours faithfully

Dean Litis

Principal Adviser, Listings Compliance (Melbourne)