



21 December 2023

Mr Dean Litis  
Principal Adviser  
Australian Stock Exchange Limited

**By email:** [ListingsComplianceMelbourne@asx.com.au](mailto:ListingsComplianceMelbourne@asx.com.au)

Dear Sirs

**CPT Global Limited (ASX: CGO) – Price Query**  
**ASX ref: ODIN86421**

We refer to your letter dated 21 December 2023. In response to your questions we have taken instructions from our client, CPT Global Limited (ASX:CGO), and advise as follows:

- 1. Is CGO 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?**

*CGO response:* No.

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

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

*CGO response:* Not applicable.

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

*CGO response:* To the knowledge of our client there is no explanation for the recent trading in our client’s securities other than the recent change in substantial shareholdings by Westferry Operations Pty Ltd and Clapsy Pty Ltd as announced to the market in accordance with the requirements of the Listing Rules.

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

*CGO response:* We confirm that to the knowledge of our client and to the best of our knowledge and information our client is complying with the Listing Rules including, without limitation, Listing Rule 3.1.

- 5. Please confirm that CGO’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 CGO with delegated authority from the board to respond to ASX on disclosure matters.**

*CGO response:* We confirm that our client’s responses to the ASX questions set out in the letter dated 21 December 2023 as noted above and issued to me as Company Secretary of our client have been provided in accordance with our client’s continuous disclosure policy and are authorised by the Chairman of the Board of Directors of our client and our client’s Continuous Disclosure Committee.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Mark Licciardo', written over a light blue rectangular background.

**Mark Licciardo**  
**Company Secretary**  
**CPT Global Limited**



21 December 2023

Reference: ODIN86421

Mr Mark Licciardo  
Company Secretary  
CPT Global Limited

By email

Dear Mr Licciardo

### **CPT Global Limited ('CGO'): Price - Query**

ASX refers to the following:

- A. The change in the price of CGO's securities from a low of \$0.115 yesterday, 20 December 2023 to an intra-day high of \$0.20 at the time of writing today.
- B. The significant increase in the volume of CGO's securities traded during the same period.

### **Request for information**

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

1. Is CGO 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 CGO relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in CGO's securities would suggest to ASX that such information may have ceased to be confidential and therefore CGO 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 CGO may have for the recent trading in its securities?
4. Please confirm that CGO is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that CGO'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 CGO 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 **3:15 PM AEDT Thursday, 21 December 2023**. You should note that if the

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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, CGO'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 CGO to request a trading halt immediately.

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.

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

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

In responding to this letter, you should have regard to CGO'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 CGO'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 faithfully

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ASX Compliance