



Monday 13 April 2015

Ms Kate Kidson,  
Principal Adviser, Listings  
ASX Compliance Pty Ltd  
Level 4, North Tower Rialto  
525 Collins Street  
Melbourne VIC 3000

*Sent via email only*

Dear Kate,

**Environmental Clean Technologies Limited (ASX Code: ESI) - Price Query**

I refer to your letter of 10 April 2015 regarding the increase in share price and trading volume for Environmental Clean Technologies Limited (the Company).

The following is the Company's response to your specific questions:

1. No, the Company is not aware of any information concerning it that has not been announced that, if known, could be an explanation for recent trading in the securities of the Company.
  - a. The company has not provided earnings guidance for the period ending 30 June 2015.
  - b. At present the Company has no reason to believe it may record any material abnormal or extraordinary items in the six months to 30 June 2015.
2. Not applicable, in that the answer above is 'No'.
3. The Company is not aware of any other explanation for the price change and increase in volume in traded securities but notes the following matters:
  - The Company has been in confidential discussions with various parties in relation to the development of its technologies in India, as advised as recently as 18 March 2015 in its Shareholder Update released to ASX, and in prior communications. These discussions are incomplete and any disclosure of negotiating detail may jeopardise the negotiations.
  - An online news article on a website titled 'Responding to Climate Change' featured comments attributed to a staff member of the Company's corporate adviser in India, YES Bank. The article touts YES Bank's green credentials in the context of the Indian banking market. In relation to ECT, the article states:

*"From a business community perspective, given the whole energy demand for India, there is a huge demand for coal,"...*

*"The use of coal is inevitable, but then how do you make it more sustainable?..."*

*...One of the case studies in Yes Bank's sustainability report regards "Coldry", a technology brought in from Australia to make India's lignite cleaner to burn.*

*It works by drying out the lignite, a brown variety of coal with high moisture content, before using it to generate power.*

*That results in coal with 280% higher calorific value, it claims, generating "substantially lower" greenhouse gas emissions than lignite in its natural form.*

*While it is far from the lowest carbon way of generating electricity, it makes a cheap source of fuel a bit less dirty."*


The above became a discussion thread on an online stock market forum after market close on Thursday 9 April 2015 and was an active subject of further discussion in that forum during the course of the day on Friday 10 April 2015.

The content of the article and comments attributed to YES Bank are not new or material information, with both our relationship with YES Bank and plans for business development in India being the subject of frequent disclosure.

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

If you have any further queries please do not hesitate to contact me.

Sincerely,



**Adam Giles**  
*Operations Manager  
& Company Secretary*



10 April 2015

Mr Adam Giles  
Company Secretary  
Environmental Clean Technologies Limited

Dear Mr Giles

**Environmental Clean Technologies Limited (the "Entity") - ASX PRICE QUERY**

We have noted a change in the price of the Entity's securities from a close of 0.8 cents on 9 April 2015 to an intra-day high of 1.2 cents today at the time of writing this letter. We have also noted an increase in the volume of trading in the Entity's securities over this period.

In light of the price change and increase in volume, ASX asks you to respond separately to each of the following questions:

1. Is the Entity 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?

In responding to this question, please consider in particular whether the Entity is aware of any information that its earnings for the 6 month period ending on 30 June 2015:

- a) are likely to differ materially (downwards or upwards) from any earnings guidance it has given for the period; or
- b) if the Entity has not given any earnings guidance for the period, are otherwise likely to come as a surprise to the market (by reference to analyst forecasts for the period or, if the Entity is not covered by analysts, its earnings for the prior corresponding period)?

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

- a) Is the Entity relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1?

Please note that the recent trading in the Entity's securities would suggest to ASX that such information may have ceased to be confidential and therefore the Entity 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 the Entity may have for the recent trading in its securities?
4. Please confirm that the Entity is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.

### **When and where to send your response**

This request is made under, and in accordance with, Listing Rule 18.7. Your response is required as soon as reasonably possible and, in any event, by not later than half an hour before the start of trading (ie before 9.30 a.m. AEST) on Monday, 13 April 2015. If we do not have your response by then, ASX will have no choice but to consider suspending trading in the Entity'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, the Entity'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 or by facsimile. 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 Rule 3.1**

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.

The obligation of the Entity to disclose information under Listing Rules 3.1 and 3.1A is not confined to, nor is it necessarily satisfied by, answering the questions set out in this letter.

In responding to this letter, you should have regard to the Entity's obligations under Listing Rules 3.1 and 3.1A and also to Guidance Note 8 *Continuous Disclosure: Listing Rules 3.1 – 3.1B*.

### **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 the Entity'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*.

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

Yours sincerely

*[Sent electronically without signature]*

Kate Kidson

**Principal Adviser, Listings Compliance (Melbourne)**