# 6 July 2020

Vanessa Nevjestic Adviser, Listings Compliance (Perth) ASX Compliance Pty Ltd **By email** 

Dear Vanessa,

# QuickFee Limited (ASX:QFE) - Price query

QFE refers to your letter dated 6 July 2020 regarding:

- A. The change in the price of QFE's securities from an intraday low of \$0.510 on 2 July 2020 to an intraday high of \$0.815 today.
- B. The significant increase in the volume of QFE's securities traded from today.

QFE provides the following responses in relation to your letter:

- 1. Is QFE 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 QFE is aware of any information that its earnings for the 12 month period ending on 30 June 2020:
    - (a) are likely to differ materially (downwards or upwards) from any earnings guidance it has given for the period; or
    - (b) if QFE 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 QFE is not covered by analysts, its earnings for the prior corresponding period)?

QFE has not provided earning guidance for FY20 and is not 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 QFE relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in QFE's securities would suggest to ASX that such information may have ceased to be confidential and therefore QFE 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?

# Not applicable.

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

No, QFE does not have any other explanation for the price change in its securities. QFE's quarterly market update is planned for release to the ASX this week.

QFE observes that several other buy now, pay later (BNPL) entities listed on the ASX have experienced large securities price increases in recent weeks.

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

QFE confirms that it is in compliance with the ASX Listing Rules and, in particular, ASX Listing Rule 3.1.

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

The responses as noted above have been authorised and approved by the board of directors.

For and on behalf of QuickFee Limited

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Kind regards,

Jennifer James

Company Secretary

QuickFee Limited



6 July 2020

Reference: ODIN20172

Ms Jennifer James Company Secretary QuickFee Limited '4 07', 10 Century Circuit BAULKHAM HILLS NSW 2153

By email: jennifer@quickfee.com.au

Dear Ms James

## QuickFee Limited ('QFE'): Price - Query

ASX refers to the following:

- A. The change in the price of QFE's securities from an intraday low of \$0.510 on 2 July 2020 to an intraday high of \$0.815 today.
- B. The significant increase in the volume of QFE's securities traded from today.

### **Request for information**

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

- 1. Is QFE 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 QFE is aware of any information that its earnings for the 12 month period ending on 30 June 2020:
    - (a) are likely to differ materially (downwards or upwards) from any earnings guidance it has given for the period; or
    - (b) if QFE 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 QFE is not covered by analysts, its earnings for the prior corresponding period)?
- 2. If the answer to question 1 is "yes".
  - (a) Is QFE relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in QFE's securities would suggest to ASX that such information may have ceased to be confidential and therefore QFE 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 QFE may have for the recent trading in its securities?

- 4. Please confirm that QFE is complying with the Listing Rules and, in particular, Listing Rule 3.1.
- 5. Please confirm that QFE'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 QFE 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 12.30 PMAWST Monday, 6 July 2020. 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, QFE'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 QFE to request a trading halt immediately.

Your response should be sent to me by e-mail at ListingsCompliancePerth@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 QFE'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 QFE's securities under Listing Rule 17.3.

## Listing Rules 3.1 and 3.1A

In responding to this letter, you should have regard to QFE'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 QFE'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 sincerely

Vanessa Nevjestic

Adviser, Listings Compliance (Perth)