

22 May 2015

By email: [Adrian.Smythe@asx.com.au](mailto:Adrian.Smythe@asx.com.au)

Mr Adrian Smythe  
ASX Compliance Pty Limited  
20 Bridge Street  
SYDNEY NSW 2000

Dear Adrian,

## Alchemia Limited – Price Query Response

I refer to your letter dated 21 May 2015 in relation to ASX Price Query.

Alchemia Limited (**Alchemia**) provides the following responses to the questions in your letter.

1. **Question:** 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?

**Response:** No; Alchemia 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. **Question:** If the answer is “yes”?

**Response:** Not applicable.

3. **Question:** If the answer is “no”, is there any other explanation that the Entity may have for the recent trading in its securities?

**Response:** On 20 May 2015, both Alchemia and ASX were notified via the lodgement of substantial holder notices that two entities had become substantial shareholders of Alchemia – being Sandon Capital Pty Ltd (at voting power of 6.2%) and Australian Ethical Smaller Companies Trust (at voting power of 6.4%). Further, on 20 May 2015 both Alchemia and ASX were notified via the lodgement of in substantial holder notice that Sandon Capital Pty Ltd had increased its interest in Alchemia (to voting power of 10%).

**Alchemia Limited**  
**Brisbane Head Office**  
(ACN 071 666 334 ABN 43 071 666 334)  
3 Hi –Tech Court Brisbane Technology Park  
Eight Mile Plains QLD 4113 Australia  
PO Box 4851 Eight Mile Plains QLD 4113, Australia  
T +61 7 3340 0200 F +61 7 3340 0222

**Melbourne Office**  
Ground Floor, Room BG08, Building 13B  
Department of Biochemistry and Molecular Biology,  
Monash University,  
Wellington Road, Clayton, VIC 3800, Australia  
T +61 3 9905 3760 F +61 3 9905 3726

These recent significant changes in Alchemia's shareholdings may explain the recent trading in its securities.

4. **Question:** Please confirm that the Entity is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.

**Response:** Alchemia is in compliance with the Listing Rules including Listing Rule 3.1. For completeness, I note that Alchemia has today requested a trading halt in respect of its shares pending the release of an announcement by Alchemia regarding its profit share on sales of its generic anti-coagulant drug fondaparinux for the quarter ending 31 March 2015.

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

Yours sincerely

A handwritten signature in black ink, appearing to read 'SD', with a long horizontal stroke extending to the right.

Stephen Denaro  
Company Secretary



ASX Compliance Pty Limited  
ABN 26 087 780 489  
20 Bridge Street  
Sydney NSW 2000  
PO Box H224  
Australia Square NSW 1215

Telephone 61 2 9227 0000  
Facsimile 61 2 9241 7620  
www.asx.com.au

21 May 2015

Mr Stephen Denaro  
Company Secretary  
Alchemia Limited  
3 Hi-Tech Court, Brisbane Technology Park  
Eight Mile Plains, QLD 4113

By email: sdenaro@triobi.com.au

Dear Mr Denaro

### **Alchemia Limited (the "Entity"): ASX price query**

We have noted a change in the price of the Entity's securities from a close of \$0.065 yesterday to a high of \$0.087 today at the time of writing.

In light of the price increase, 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?
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 am AEST on Friday, 22 May 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 at [adrian.smythe@asx.com.au](mailto:adrian.smythe@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 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]*

Adrian Smythe  
**Manager, Listings Compliance**