

Dear Mr. Mah,

**JGY Holdings Limited (the "Company" or "JGY")**

**Re: Periodic Disclosure Query**

We refer to the Company's Annual Report<sup>1</sup> released on 17 July 2019, and the Company's responses to Periodic Disclosure Queries released on 20 September 2019<sup>2</sup> and 18 October 2019<sup>3</sup>. NSX notes the following:

- a) The Company has provided a revised aging analysis to its Trade receivables account which is significantly different from the Company's previous response on 20 September 2019.

In the Company's response released on 20 September 2019:

Trade receivables

Outstanding period	Financial period ended 30 September 2018	Financial period ended 31 March 2019
3 to 6 months	7,713,989	7,094,841
6 to 12 months	635,019	2,125,964
12 to 24 months		
24 to 36 months		
More than 36 months		
Total		

In the Company's response released on 18 October 2019:

Trade receivables

Outstanding period	Financial period ended 30 September 2018	Financial period ended 31 March 2019
3 to 6 months	2,154,289	840,129
6 to 12 months	3,642,460	4,007,187
12 to 24 months	2,552,259	4,373,489
24 to 36 months		
More than 36 months		
Total		

- b) In the Company's response to question 6 released on 18 October 2019 regarding 'Other receivables – Third parties'

Outstanding period	Financial period ended 30 September 2018	Financial period ended 31 March 2019
3 to 6 months	5,330,209	4,669,826
6 to 12 months		
12 to 24 months		
24 to 36 months		
More than 36 months		
Total	5,330,209	4,669,826

"The amount of \$5,330,209 is the prepayment the company made to owner of rural land for using land every year, when the company made the payment the company recorded as other receivable, when the actual amount need to be paid are available then the company do the adjustment accordingly, after doing the adjustment the company recorded as cost of using land."

<sup>1</sup> <https://www.nsx.com.au/ftp/news/021737118.PDF>

<sup>2</sup> <https://www.nsx.com.au/ftp/news/021737361.PDF>

<sup>3</sup> <https://www.nsx.com.au/ftp/news/021737476.PDF>

- c) In note 6 of the Annual Report on page 18, the Company provided a breakdown as follows:

Trade and other receivables:

	The Company		The Group	
	2019 \$	2018 \$	2019 \$	2018 \$
Trade receivables	-	-	9,220,805	6,559,313
Prepayment	-	-	900,026	840,864
Other receivables – Third parties	-	-	3,769,800	3,747,571
Other receivables – Related parties	-	-	4,347,305	2,753,843
Amount due from staff	-	-	20,000	9,063

In relation to the above, please respond to the following questions.

1. In relation to a), please explain why the Company has provided different responses to the Exchange's queries.
2. The Company's response in b), states that the amount of \$5,330,209 in 'other receivables – third parties' is the prepayment the Company '*made to owner of rural land for using land every year*'. However, in the Annual Report referenced in c), the 'prepayment' and 'other receivables – third parties' are separate accounts. Can the Company please confirm whether the full amount of \$4,669,826 mentioned in b) as the 'other receivables – Third parties' also relates to a prepayment to the owner of rural land used by the Company?
3. If the answer to question 2 is yes, please explain why the 'prepayment' account and the 'other receivables – third parties' were recorded separately in its Annual Report?
4. If the answer to question 2 is no, please explain what the full amount of \$4,669,826 mentioned in b) relates to.

This request is made under, and in accordance with, Listing Rule 2.7. It goes to whether the Company is in compliance with Listing Rules Section IIA 6.4 and 6.5A.

Your response should be sent to me directly via email no later than **4 pm on 4 November 2019**. Your response will be released to the market along with a copy of this letter. If you wish to discuss the content of your response, please do not hesitate to contact me as soon as possible.

Yours sincerely

**Ingrid Wei**  
**Market Surveillance Analyst**