

19 March 2024

Ms. Yulia Gurdina  
Senior Adviser, Listings Compliance (Sydney)  
ASX Compliance Pty Ltd  
Via Email: [ListingsComplianceSydney@asx.com.au](mailto:ListingsComplianceSydney@asx.com.au)

Dear Yulia

**Zoono Group Limited ('ZNO'): Price Query**

We refer to your letter dated 19 March 2024 in relation to the change in ZNO's share price from a low of \$0.044 on 12 March 2024 to a high of \$0.069 today and the significant increase in the volume of ZNO's securities today, 19 March 2024, and confirm as follows:

1. ZNO is not aware of any information concerning it that has not been announced to the market which, if known by some of the market could explain the recent trading in securities.
2. N/A
3. ZNO is not aware of any explanation for the recent trading in its securities other than the Company's announcement advising its entry into an Exclusive Agency Agreement with OSY Group Limited to promote the sale of Zoono products for the food supply chain sector as announced on 6 March 2024.
4. ZNO confirms it is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.
5. I confirm the above responses have been authorised and approved by the Zoono Group Limited Board.

Yours sincerely

**ZOONO GROUP LIMITED**



Elissa Hansen  
Company Secretary



19 March 2024

Reference: ODIN91048

Ms Elissa Hansen  
Company Secretary  
Zoono Group Limited

By email

Dear Ms Hansen

**Zoono Group Limited ('ZNO'): Price Query**

ASX refers to the following:

- A. The change in the price of ZNO's securities from a low of \$0.044 on 12 March 2024 to a high of \$0.069 on 19 March 2024.
- B. The significant increase in the volume of ZNO's securities traded on 19 March 2024.

**Request for information**

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

- 1. Is ZNO 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 ZNO relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in ZNO's securities would suggest to ASX that such information may have ceased to be confidential and therefore ZNO 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 ZNO may have for the recent trading in its securities?
- 4. Please confirm that ZNO is complying with the Listing Rules and, in particular, Listing Rule 3.1.
- 5. Please confirm that ZNO'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 ZNO 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 **4:30 PM AEDT on Tuesday, 19 March 2024**. 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

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within the exceptions mentioned in Listing Rule 3.1A, ZNO'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 ZNO to request a trading halt immediately.

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

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

In responding to this letter, you should have regard to ZNO'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 ZNO'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.

Regards

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ASX Compliance