

Australian Securities Exchange
Level 40 Central Park
152-158 St Georges Terrace
Perth WA 6000

Attention: Ms Jenita Iyalu
By email only: ListingsCompliancePerth@asx.com.au

15 February 2023

Dear Ms Iyalu

RESPONSE TO ASX QUERY

Halo Food Co. Limited ("Halo" or "HLF") refers to the price and volume query letter received from the ASX on 14 February 2023.

Halo responds to each of the ASX's questions below:

1. Is HLF 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?

No, HLF is not aware of 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 HLF relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in HLF's securities would suggest to ASX that such information may have ceased to be confidential and therefore HLF 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.



Halo Food Co. Limited
ABN: 49 621 970 652
Level 5, 126 Phillip Street
Sydney NSW 2000 Australia
halofoodco.com

- 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 HLF may have for the recent trading in its securities?

HLF is not aware of any other explanation for the trading in its securities. HLF notes that there has been speculation on social media regarding a potential sale of assets by the company. The company is considering the sale and leaseback of wholly owned land and buildings in New Zealand and is testing market valuation and appetite, however, at this time no decision has been made by the board and no formal agreements have been entered into in respect of such a sale and, as such, the company does not reasonably expect that this would explain the trading in the company's securities.

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

HLF confirms that, in its opinion, it is in compliance with the Listing Rules

- 5. Please confirm that HLF's responses to the questions above have been authorised and approved under its continuous disclosure policy or otherwise by its board or an officer of HLF with delegated authority from the board to respond to ASX on disclosure matters.

HLF's responses have been authorised and approved by the board.

Yours sincerely,



Jourdan Thompson
Chief Executive Officer



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14 February 2023

Reference: ODIN68228

Mr Jourdan Thompson
Chief Executive Officer
Halo Food Co. Limited

By email

Dear Mr Thompson

Halo Food Co. Limited ('HLF'): Price and Volume - Query

ASX refers to the following:

- A. The change in the price of HLF's securities from a high of \$0.027 to a low of \$0.021 today.
- B. The significant increase in the volume of HLF's securities traded today.

Request for information

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

1. Is HLF 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 HLF relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in HLF's securities would suggest to ASX that such information may have ceased to be confidential and therefore HLF 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 HLF may have for the recent trading in its securities?
4. Please confirm that HLF is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that HLF'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 HLF 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 AWST Tuesday, 14 February 2023**. 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, HLF'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 HLF 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 HLF'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 HLF's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

In responding to this letter, you should have regard to HLF'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 HLF'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

Jenita Iyalu
Adviser, Listings Compliance