

10 June 2021

Ms Melissa Kostopoulos  
Compliance Advisor, Listings Compliance (Melbourne)  
ASX Compliance Pty Ltd (ASX)  
North Tower, Rialto  
Level 4, 525 Collins Street  
Melbourne Victoria 3000

**By email:** listingscompliancemelbourne@asx.com.au

Dear Melissa,

**Response to Price and Volume Query**

We refer to your letter dated 10 June 2021 requesting details relating to the increase in our share price from a low of \$0.115 to a high of \$0.15 on 10 June 2021, together with the significant increase in the volume of the securities traded.

Austco Healthcare Limited (“AHC”) responds to each of the queries set out in your letter as follows:

1. Is AHC 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.

If the answer to question 1 is “yes”.

- (a) Is AHC relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in AHC’s securities would suggest to ASX that such information may have ceased to be confidential and therefore AHC 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.

Not applicable.

- (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).

Not applicable.

- (c) If an announcement cannot be made immediately, why not and when is it expected that an announcement will be made?

Not applicable.

2. If the answer to question 1 is “no”, is there any other explanation that AHC may have for the recent trading in its securities?

AHC is aware that an analyst commenced coverage of the Company and we understand released a report this morning. The report included a valuation of AHC with a price recommendation of \$0.13, commentary on the positive prospects of AHC and referred to AHC’s profit upgrade announcement made to the ASX on 28 May 2021.

The report was published by Under the Radar Pty Ltd and is available by subscription at [www.undertheradarreport.com.au](http://www.undertheradarreport.com.au)

AHC has historically received very nominal amounts of analyst coverage.

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

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

4. Please confirm that AHC’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 AHC with delegated authority from the board to respond to ASX on disclosure matters.

AHC confirms that these responses have been authorised by the Board.

If you have any further queries or require further information, please do not hesitate to contact me.

Yours sincerely



**Brendan Maher**  
Company Secretary  
Austco Healthcare Limited



10 June 2021

Reference: ODIN35759

Mr Brendan Maher  
Company Secretary  
Austco Healthcare Limited  
Unit 1, 31 Sabre Drive  
Port Melbourne Vic 3207

By email: [brendan.maher@austco.com](mailto:brendan.maher@austco.com)

Dear Mr Maher

### **Austco Healthcare Limited ('AHC'): Price - Query**

ASX refers to the following:

- A. The change in the price of AHC's securities from a low of \$0.115 to a high of \$0.150 today.
- B. The significant increase in the volume of AHC's securities traded today.

### **Request for information**

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

1. Is AHC 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?

If the answer to question 1 is "yes".

- (a) Is AHC relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in AHC's securities would suggest to ASX that such information may have ceased to be confidential and therefore AHC 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?
2. If the answer to question 1 is "no", is there any other explanation that AHC may have for the recent trading in its securities?
  3. Please confirm that AHC is complying with the Listing Rules and, in particular, Listing Rule 3.1.
  4. Please confirm that AHC'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 AHC 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 **2:30 PM AEST Thursday, 10 June 2021**. 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, AHC'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 AHC to request a trading halt immediately.

Your response should be sent to me by e-mail at [ListingsComplianceMelbourne@asx.com.au](mailto:ListingsComplianceMelbourne@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 AHC'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 AHC's securities under Listing Rule 17.3.

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

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

Regards

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**Melissa Kostopoulos**  
Compliance Adviser, Listings Compliance (Melbourne)