

30 November 2021

Ms Laura Gomme
Advisor, Listings Compliance (Perth)
ASX Limited
Level 40, Central Park
152-158 St Georges Terrace
PERTH WA 6000

By email: ListingsCompliancePerth@asx.com.au

Dear Ms Gomme

ADVERTITAS LIMITED ("COMPANY"): PRICE QUERY

I refer to your letter to the Company dated 30 November 2021 in relation to the change in price and trading volume of the Company's securities (your "Letter").

Utilising the numbering in your Letter, the Company responds as follows:

1. The Company 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. Not applicable.
3. The Company has no other explanation for the recent trading in the Company's securities, however it does draw attention to the strong traction across all marketing channels and pricing models which was noted in the Company's recent Annual General Meeting CEO Presentation that was released to ASX on 23 November 2021 and the continued promotion of TrafficGuard, the Company's full funnel measurement, verification and fraud prevention solution for digital advertising. In addition to the momentum gained during 2021, TrafficGuard will be marketed worldwide to all of the Google Cloud's customers that use Google PPC advertising (refer ASX announcement of 14 October 2021) and Adveritas and Google are currently working on joint PR, customer engagement and marketing of TrafficGuard. The Company has also re-shaped its sales team this year with talented sales representatives across Asia and Europe to position the Company for future growth.
4. The Company confirms that it has, at all times, complied with, and continues to comply with the ASX Listing Rules and in particular, Listing Rule 3.1.
5. This response has been authorised and approved by the Board.

On behalf of the Board



Susan Park
Company Secretary

For more information, please contact:

Investor Enquiries

Mathew Ratty
Chief Executive Officer
Adveritas Limited
(08) 9473 2500
investor.enquiry@adveritas.com.au



30 November 2021

Reference: ODIN43472

Ms Susan Park
Suite 10, 16 Brodie Hall Drive
Bentley
WA 6102

By email: spark@parkadvisory.com.au

Dear Ms Park

Adveritas Limited ('AV1'): Price - Query

ASX refers to the following:

- A. The change in the price of AV1's securities from \$0.155 at close of trading on 29 November 2021 to an intraday high of \$0.195 on 30 November 2021, and
- B. The significant increase in the volume of AV1's securities traded on 30 November 2021.

Request for information

In light of this, ASX asks AV1 to respond separately to each of the following questions and requests for information:

- 1. Is AV1 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 AV1 relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in AV1's securities would suggest to ASX that such information may have ceased to be confidential and therefore AV1 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 AV1 may have for the recent trading in its securities?
- 4. Please confirm that AV1 is complying with the Listing Rules and, in particular, Listing Rule 3.1.
- 5. Please confirm that AV1'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 AV1 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 **11.00 AM AWST Tuesday, 30 November 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 within the exceptions mentioned in Listing Rule 3.1A, AV1'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 AV1 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 AV1'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 AV1's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

In responding to this letter, you should have regard to AV1'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 AV1'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

For personal use only

Laura Gomme
Adviser, Listings Compliance (Perth)