



Victory Offices
WE MIND **YOUR** BUSINESS

ASX Code: VOL

Geraldi Mimery
Adviser - ASX Listings Compliance (Melbourne)
Level 4, Rialto North Tower
525 Collins Street
MELBOURNE VIC 3000

4 August 2022

Dear Mr Mimery,

Victory Offices Limited ('VOL'): Price - Query

Victory Offices Limited (ASX:VOL) (**Victory Offices** or **the Company**) refers to ASX's letter of 3 August 2022 in relation to the change in the price and significant increase in the volume of VOL's securities from a low of \$0.017 at the close of trade on Tuesday, 2 August 2022, to an intraday high of \$0.035 at the time of sending the letter.

Accordingly, the Company responds to your questions with respect to this particular information, as follows:

- 1) Is VOL 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.
- 2) If the answer to question 1 is "yes":
 - (a) Is VOL relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in VOL's securities would suggest to ASX that such information may have ceased to be confidential and therefore VOL 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.
- 3) If the answer to question 1 is "no", is there any other explanation that VOL may have for the recent trading in its securities?



Victory Offices

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VOL is not aware of anything that would directly affect the recent trading in securities.

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

VOL confirms that it is complying with the Listing Rules, in particular Listing Rule 3.1.

- 5) Please confirm that VOL'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 VOL with delegated authority from the board to respond to ASX on disclosure matters.

VOL confirms that its responses to the questions above have been authorised and approved by the Board of Victory Offices Limited.

Yours sincerely,

Mark Licciardo

**Company Secretary
Victory Offices Limited**



3 August 2022

Reference: 56267

Mr Mark Licciardo
Company Secretary
Victory Offices Limited
Level 7, 330 Collins Street
Melbourne VIC 3000

By email

Dear Mr Licciardo

Victory Offices Limited ('VOL'): Price - Query

ASX refers to the following:

- A. The change in the price of VOL's securities from a low of \$0.017 at the close of trade on Tuesday, 2 August 2022, to an intraday high of \$0.035 today.
- B. The significant increase in the volume of VOL's securities traded today.

Request for information

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

1. Is VOL 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 VOL relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in VOL's securities would suggest to ASX that such information may have ceased to be confidential and therefore VOL 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 VOL may have for the recent trading in its securities?
4. Please confirm that VOL is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that VOL'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 VOL 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 **9:30 AM AEST Thursday, 4 August 2022**. 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, VOL'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 VOL to request a trading halt immediately.

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

Listing Rules 3.1 and 3.1A

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

Geraldi Mimery

Adviser, Listings Compliance (Melbourne)