

# ASX ANNOUNCEMENT



22 February 2024

Ms Melissa Kostopoulos  
Senior Adviser, Listings Compliance  
ASX Limited  
525 Collins Street  
MELBOURNE VIC 3000

**By email: [ListingsComplianceMelbourne@asx.com.au](mailto:ListingsComplianceMelbourne@asx.com.au)**

Dear Melissa

## ASX PRICE QUERY

We refer to the Price and Volume Query received from the ASX today and respond as follows to the specific questions asked:

1. **Is TRI 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?**

**In responding to this question, please consider in particular whether TRI is aware of any information that its earnings for the 6 month period ending on 31 December 2023:**

- a) **are likely to differ materially (downwards or upwards) from any earnings guidance it has given for the period; or**
- b) **if TRI has not given any earnings guidance for the period, are otherwise likely to come as a surprise to the market (by reference to analyst forecasts for the period or, if TRI is not covered by analysts, its earnings for the prior corresponding period)?**

No.

2. **If the answer to question 1 is “yes”.**
  - a) **Is TRI relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in TRI’s securities would suggest to ASX that such information may have ceased to be confidential and therefore TRI 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 – see our response to question 1 above.

- 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 – see our response to question 1 above.

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

Not applicable – see our response to question 1 above.

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

The Company is aware of an article published in Stockhead titled “Diagnosing mental disorder through sleep: How TrivarX could capture this huge research market” and believes that there is nothing in the article which warrants announcement to the ASX and has not previously been announced. The Company notes that it is currently in early-stage discussions concerning potential research collaboration with the Uniformed Services University of the Health Sciences in Bethesda, Maryland, USA. No agreement has been reached in relation to this collaboration or the scope of any potential research.

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

We confirm that the Company is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.

5. **Please confirm that TRI’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 TRI with delegated authority from the board to respond to ASX on disclosure matters.**

Confirmed

Yours sincerely



Stephen Buckley  
**Company Secretary**

**About TrivarX Limited:**

TrivarX (ASX: TRI) (OTCPINK: MDBIF) is a mental health technology company pioneering the use of objective measures to aid in the early detection and screening of mental health conditions. Through their Corporate Health product, the Company offers mental well-being solutions for businesses and are also developing products to serve the healthcare provider market. The Company was founded in Australia, with offices located in Perth (WA) and Minneapolis (MN, USA). TrivarX is listed on the Australian Securities Exchange Ltd and trades on the OTCQB Venture Market. Investors can find additional information on [www.otcm Markets.com](http://www.otcm Markets.com) and [www.asx.com.au](http://www.asx.com.au)



22 February 2024

Reference: 89041

Mr Stephen Buckley  
Company Secretary  
Trivarx Ltd  
647 Beaufort Street  
Mt Lawley, WA

By email: SBuckley@governancecorp.com.au

Dear Mr Buckley

**Trivarx Ltd ('TRI'): Price - Query**

ASX refers to the following:

- A. The change in the price of TRI's securities from a low of \$0.022 at close of trade yesterday to a high of \$0.036 today.
- B. The significant increase in the volume of TRI's securities traded today.

**Request for information**

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

1. Is TRI 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?

In responding to this question, please consider in particular whether TRI is aware of any information that its earnings for the 6 month period ending on 31 December 2023:

- (a) are likely to differ materially (downwards or upwards) from any earnings guidance it has given for the period; or
  - (b) if TRI has not given any earnings guidance for the period, are otherwise likely to come as a surprise to the market (by reference to analyst forecasts for the period or, if TRI is not covered by analysts, its earnings for the prior corresponding period)?
2. If the answer to question 1 is "yes".
    - (a) Is TRI relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in TRI's securities would suggest to ASX that such information may have ceased to be confidential and therefore TRI 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 TRI may have for the recent trading in its securities?

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4. Please confirm that TRI is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that TRI'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 TRI 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 **1:00 PM AEDT Thursday, 22 February 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 within the exceptions mentioned in Listing Rule 3.1A, TRI'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 TRI 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 TRI'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 TRI's securities under Listing Rule 17.3.

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

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

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**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

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