

16 April 2024

Ramona Seeto  
Adviser, Listings Compliance  
ASX Limited  
20 Bridge St,  
Sydney NSW, 2000

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

Dear Ramona

### **Response to ASX Price Query - Gratifii Limited (ASX: GTI)**

We refer to the "Price Query" Letter from the ASX at 12:33pm today (16 April 2024), requesting information regarding today's intraday activity in Gratifii Limited (**GTI**) shares.

Set out below are GTI's responses to the matters raised by the ASX Price.

1. Is GTI 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 securities?

**Response:** - No.

2. If the answer to question 1 is "yes"
  - a. Is GTI relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in GTI's security would suggest that such information may have ceased to be confidential and therefore GTI 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.

**Response** – 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).

**Response** – Not Applicable.

- c. If an announcement cannot be made immediately, why not and when is it expected that an announcement can be made?

**Response** – Not Applicable.

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

**Response** – GTI notes the FY24 half year results released to the ASX provided an outlook with an 'expectation of continued margin and revenue growth'.

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

**Response** – Confirmed.

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

**Response** – Confirmed.

Yours sincerely,

A handwritten signature in black ink, appearing to read "B. Newling".

**Ben Newling**  
Company Secretary  
Gratifii Limited



16 April 2024

Reference: 92493

Mr Ben Newling  
Chief Financial Officer and Company Secretary  
Gratifik Limited

Dear Mr Newling

**Gratifik Limited ('GTI'): Price – Query**

ASX refers to the following:

- A. The change in the price of GTI's securities from a closing price of \$0.004 on 15 April 2024 to an intraday high of \$0.007 at the time of writing today, 15 April 2024.
- B. The significant increase in the volume of GTI's securities traded over this period.

**Request for information**

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

1. Is GTI 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 GTI relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in GTI's securities would suggest to ASX that such information may have ceased to be confidential and therefore GTI 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 GTI may have for the recent trading in its securities?
4. Please confirm that GTI is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that GTI'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 GTI 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 AEDT Tuesday, 16 April 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, GTI's obligation is to disclose the information

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'immediately'. This may require the information to be disclosed before the deadline set out in the previous paragraph and may require GTI to request a trading halt immediately.

Your response should be sent by e-mail at **ListingsComplianceSydney@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 GTI'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 GTI's securities under Listing Rule 17.3.

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

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

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**ASX Compliance**