



**Australian
Agricultural
Projects Ltd**

ABN: 19 104 555 455

Head Office

Suite 14, 456 St Kilda Road
Melbourne VIC 3004

E:admin@voopl.com.au

17 November 2020

Sandra Wutete
ASX Listings Compliance – Perth
Level 40, Central Park
152-158 St Georges Terrace
Perth WA 6000

By email: Sandra.Wutete@asx.com.au; ListingsCompliancePerth@asx.com.au

Dear Sandra,

AUSTRALIAN AGRICULTURAL PROJECTS LIMITED (ASX: AAP) – ASX PRICE AND VOLUME QUERY

We refer to your letter dated 17 November 2020 in relation to a noted increase in the price and trading volume of the Company's securities and respond to your queries in the same order as raised:

1. Is AAP 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?

The Company is not aware of any information concerning it that has not been announced to the market which, if known, could explain the recent trading in the securities of the Company.

2. If the answer to question 1 is "yes".

Not applicable.

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

Other than the recent ASX releases stated below the Company is not aware of any other matters which could explain the increase in price and trading volume of the Company's securities this morning:

- *Full year 2019/2020 Financial Result and Operating Review dated 31 August 2020;*
- *2020 Annual Report dated 30 September 2020; and*
- *Quarterly Update and Appendix 4C – September 2020 dated 30 October 2020.*

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

The Company confirms it is in compliance with the Listing Rules, including Listing Rule 3.1.

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

The above has been authorised and approved in accordance with the Company's published continuous disclosure policy or otherwise by its board or an officer of the Company with delegated authority from the board to respond to ASX on disclosure matters.

Yours sincerely

Paul Challis
Managing Director

For personal use only



17 November 2020

Reference: 27916

Mr Kim Hogg
Company Secretary
Australian Agricultural Projects Limited

By email

Dear Mr Hogg

Australian Agricultural Projects Limited ('AAP'): Price - Query

ASX refers to the following:

- A. The change in the price of AAP's securities from a close of \$0.014 on Friday, 13 November 2020 to an intra-day high, at the time of writing this letter, of \$0.045 today.
- B. The significant increase in the volume of AAP's securities traded today, 17 November 2020.

Request for information

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

1. Is AAP 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 AAP relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in AAP's securities would suggest to ASX that such information may have ceased to be confidential and therefore AAP 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 AAP may have for the recent trading in its securities?
4. Please confirm that AAP is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that AAP'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 AAP 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, 17 November 2020**. 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, AAP'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 AAP 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 AAP'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 AAP's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

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

Sandra Wutete

For personal use only

Senior Adviser, Listings Compliance (Perth)