

23 September 2024

Mr Riley Jackson  
Adviser – Listings Compliance  
ASX Compliance Pty Ltd  
Rialto, South Tower Level 50  
525 Collins Street,  
Melbourne VIC 3000

By email: ListingsComplianceMelbourne@asx.com.au

Dear Sir

**PRICE QUERY**

We refer to your letter dated 23 September 2024.

1. Is NOV 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?

**Response:** No

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

**Response:** N/A

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

**Response:** NOV is unaware of any specific reason for the recent trading in its securities other than continued successful execution of the company's strategy to simplify its business and lift financial performance, demonstrated through recent announcements to ASX. This includes the release on 30 August 2024 in which the unaudited FY24 results highlighted significant year-on-year improvements, including a 10% increase to revenue, a 19% decrease in operating expenses and a 16% improvement in underlying EBITDA. Similarly, the announcement on 29 August 2024 and amended Appendix 4C noted operating cash use reducing to \$1.9m for the June quarter highlighting continued progress to achieving the company's goal of positive operating cashflow by the end of H1 FY25.

4. Please confirm NOV is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.

**Response:** Confirmed

5. Please confirm that NOV's responses to the questions above have been authorized and approved under its published continuous disclosure policy or otherwise by its board or an officer of NOV with delegated authority from the board to respond to ASX on disclosure matters.

**Response:** Confirmed

Yours faithfully  
Novatti Group Limited



**Ian Hobson**  
Company Secretary

flexepin



VascoPay



Novatti  
BILLPAY



23 September 2024

Reference: ODIN100412

Mr Steven Stamboultgis  
Company Secretary  
Novatti Group Limited  
Level 3 461 Bourke Street  
MELBOURNE VIC AU 3000

By email:

Dear Mr Stamboultgis

**Novatti Group Limited ('NOV'): Price - Query**

ASX refers to the following:

- A. The change in the price of NOV's securities from a low of \$0.06 to a high of \$0.09 today.
- B. The significant increase in the volume of NOV's securities traded from 20 September 2024 to 23 September 2024.

**Request for information**

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

1. Is NOV 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 NOV relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in NOV's securities would suggest to ASX that such information may have ceased to be confidential and therefore NOV 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 NOV may have for the recent trading in its securities?
4. Please confirm that NOV is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that NOV'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 NOV with delegated authority from the board to respond to ASX on disclosure matters.

**When and where to send your response**

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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 **1:30 PM AEST Monday, 23 September 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, NOV'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 NOV 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 NOV'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 NOV's securities under Listing Rule 17.3.

### Listing Rules 3.1 and 3.1A

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

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.

Yours sincerely

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ASX Compliance