



10 August 2021

Dean Litis
Principal Adviser, Listings Compliance (Melbourne)
Level 4, 525 Collins St
Melbourne VIC 3000

By email only: dean.litis@asx.com.au

Dear Dean

KNeoMedia Limited (the Company)

We refer to your letter to the Company dated 10 August 2021 entitled **KNeoMedia Ltd ('KNM'):**
Price - Query.

We respond to each of your queries as follows (adopting your numbering):

- 1. Is KNM 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 that could explain the recent trading in its securities.

- 2. If the answer to question 1 is "yes":**

- a. Is KNM relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in KNM's securities would suggest to ASX that such information may have ceased to be confidential and therefore KNM 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 KNM may have for the recent trading in its securities?**
4. On 31 July the Company released a Quarterly Activities Report and Appendix 4C which referred to a new sales cycle beginning in the current quarter due to in-person teaching resuming in the USA and the roll-out of previously stalled education programs.
5. **Please confirm that KNM is complying with the Listing Rules and, in particular, Listing Rule 3.1.**

The Company confirms it is complying with the Listing Rules and, in particular, Listing Rule 3.1.

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

This response has been authorised and approved by the Company’s Executive Chairman on behalf of the Board of Directors.

Yours sincerely

James Kellett
Executive Chairman
KneoMedia Limited



10 August 2021

Reference: ODIN37839

Ms Eryl Baron
Company Secretary
KneoMedia Limited
Level 9, 401 Collins Street
VIC 3000

By email

Dear Ms Baron

KneoMedia Limited ('KNM'): Price - Query

ASX refers to the following:

- A. The change in the price of KNM's securities from a low of 0.7 cents to a high (and closing price) of 1 cent today.
- B. The significant increase in the volume of KNM's securities traded today.

Request for information

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

1. Is KNM 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 KNM relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in KNM's securities would suggest to ASX that such information may have ceased to be confidential and therefore KNM 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 KNM may have for the recent trading in its securities?
4. Please confirm that KNM is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that KNM'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 KNM 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 Wednesday, 11 August 2021**. 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, KNM'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 KNM 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 KNM'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 KNM's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

In responding to this letter, you should have regard to KNM'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 KNM'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 faithfully

Dean Litis

Principal Adviser, Listings Compliance (Melbourne)