



**PROTECT | DETECT | CONNECT**

9 January 2018

Ms Lux Wigneswaran  
Principal Adviser, Listings (Sydney)  
Australian Securities Exchange  
Exchange Square  
20 Bridge Street  
SYDNEY NSW 2000

**Via Email:** [Luxmy.wigneswaran@asx.com.au](mailto:Luxmy.wigneswaran@asx.com.au)

Dear Lux,

**Price Query**

I refer to your correspondence of 8 January 2018 as attached and reply as follows using your numbering:

1. Yes. The company is in the process of undertaking a capital raise and is in negotiations regarding a potential strategic relationship.  
The Company has not given earnings guidance for the 12 month period ended 31 December 2017, it is not covered by analysts and does not expect its earnings result for the period to come as a surprise to the market.
2. a). Yes, however the Company in any event requested a trading halt on 8 January 2018.  
b). No, however the Company is already in a trading halt.  
c). No later than pre-opening 10 January 2018
3. No, however the Company has subsequent to your correspondence requested a trading halt as it is intending to make an announcement in regard to a capital raising and a potential strategic relationship. The requested trading halt will last until open of trading Wednesday 10 January 2018..
4. I can confirm that the Company is in compliance with the listing rules and, in particular, listing rule 3.1.
5. I confirm that the responses are authorised by the Board of YPB.

Yours faithfully

Robert Whitton  
Company Secretary



PROTECT | DETECT | CONNECT



8 January 2018

Robert Whitton  
Company Secretary  
YPB Group Ltd  
c/o William Buck  
Level 29 66 Goulburn Street  
Sydney NSW 2000

By Email

Dear Mr Whitton

**YPB Group Ltd (“YPB”): Price Query**

We note the change in the price of YPB’s securities from a close of \$0.051 on Friday 5 January 2018 to a high of \$0.07 at the time of writing today, 8 January 2018.

We also note the significant increase in the volume of YPB’s securities traded today.

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

1. Is YPB 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 YPB is aware of any information that its earnings for the 12 month period ended 31 December 2017:

- a) are likely to differ materially (downwards or upwards) from any earnings guidance it has given for the period; or
- b) if YPB 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 YPB is not covered by analysts, its earnings for the prior corresponding period)?

2. If the answer to question 1 is “yes”:

- a) Is YPB relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1?

Please note that the recent trading in YPB’s securities would suggest to ASX that such information may have ceased to be confidential and therefore YPB 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 YPB may have for the recent trading in its securities?
4. Please confirm that YPB is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that YPB’s responses to the questions above have been authorised and approved in accordance with its published continuous disclosure policy or otherwise by its board or an officer of YPB 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, and in accordance with, Listing Rule 18.7. Your response is required as soon as reasonably possible and, in any event, by not later than half an hour before the start of trading (i.e. before 9.30am AEDT) on Tuesday 9 January 2018. If we do not have your response by then, ASX will have no choice but to consider suspending trading in YPB’s securities under Listing Rule 17.3.

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, YPB’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.

ASX reserves the right to release a copy of this letter and your response on the ASX Market Announcements Platform under Listing Rule 18.7A. Accordingly, your response should be in a form suitable for release to the market.

Your response should be sent to me by e-mail. 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.

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

Listing Rule 3.1 requires a listed entity to give ASX immediately any information concerning it that a reasonable person would expect to have a material effect on the price or value of the entity’s securities. Exceptions to this requirement are set out in Listing Rule 3.1A.

In responding to this letter, you should have regard to YPB’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 YPB’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.

### **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 YPB’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 may 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*.

If you have any queries or concerns about any of the above, please contact me immediately.

Yours sincerely

*[Sent electronically without signature]*

Lux Wigneswaran  
**Principal Adviser, Listings Compliance (Sydney)**