

Mr Wade Baggott  
Manager, Listings Compliance (Perth)  
Australian Stock Exchange  
Level 40, Central Park  
152-158 St George's Terrace  
PERTH WA 6000

## Price and Volume Query

We, being VDM Group Limited (**VDM** or the **Company**) (ASX: VMG), hereby respond to your letter of today regarding the price increase of the Company's shares to an intra-day high of \$0.008 and an increase in the volume of trading in the Company's securities, and respond to your questions as follows:

1. Is VDM 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 VDM relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1?; b) can an announcement be made immediately?; c) If an announcement cannot be made immediately, why not and when is it expected that an announcement will be made?

**Response:** Not applicable.

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

**Response:** No.

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

**Response:** We confirm that the Company is in compliance with the Listing Rules, and in particular, Listing Rule 3.1.

These responses have been authorised for release by members of the Board of VDM.

Yours sincerely  
VDM GROUP LTD



**MICHAEL FRY**  
DIRECTOR and COMPANY SECRETARY

### BOARD & MANAGEMENT

Mr Luk Hiuming  
NON-EXECUTIVE CHAIRMAN

Dr Dongyi Hua  
EXECUTIVE DIRECTOR  
OF MINING

Mr Michael Fry  
DIRECTOR  
COMPANY SECRETARY

### REGISTERED OFFICE

Suite 2, Level 2, 123 Adelaide  
Terrace, East Perth, WA 6004

### POSTAL ADDRESS

PO Box 3347  
East Perth, WA 6892

### CONTACT DETAILS

Tel: (08) 9221 6739

### WEBSITE

[vdmgroup.com.au](http://vdmgroup.com.au)

### SHARE REGISTRY

Computershare Investor  
Services Pty Limited  
GPO Box 2975  
Melbourne, VIC 3001  
Tel: 1300 850 505

### ASX CODE

VMG

**For further information please contact:**

Michael Fry  
Company Secretary  
VDM Group Limited  
(08) 9221 6739



2 March 2020

Mr Michael Fry  
Company Secretary  
VDM Group Limited

By email:

Dear Mr Fry

### **VDM Group Limited ('VMG'): Price and Volume Query**

We note the change in the price of VMG's securities from a last traded price of \$0.0015 on 21 February 2020 to an intra-day high of \$0.008 at the time of writing today.

We also note the significant increase in the volume of VMG's securities traded today.

### **Request for Information**

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

1. Is VMG 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?

If the answer to question 1 is "yes".

- (a) Is VMG relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in VMG's securities would suggest to ASX that such information may have ceased to be confidential and therefore VMG 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?
2. If the answer to question 1 is "no", is there any other explanation that VMG may have for the recent trading in its securities?
  3. Please confirm that VMG is complying with the Listing Rules and, in particular, Listing Rule 3.1.
  4. Please confirm that VMG'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 VMG 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 **10:30 AM AWST today Monday, 2 March 2020**. If we do not have your response by then, ASX will likely suspend trading in VMG'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, VMG's obligation is to disclose the

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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 at [ListingsCompliancePerth@asx.com.au](mailto: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.

### **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 VMG’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 VMG’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 VMG’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*.

### **Suspension**

If you are unable to respond to this letter by the time specified above ASX will likely suspend trading in VMG’s securities under Listing Rule 17.3.

### **Enquiries**

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

Yours sincerely

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**Wade Baggott**  
Manager, Listings Compliance (Perth)