



8 November 2019

Belinda Chiu
Senior Advisor, Listings Compliance (Sydney)
Australian Securities Exchange
20 Bridge Street
SYDNEY NSW 2000

Dear Belinda

Response to ASX Price Query

Corum Group Limited (ASX: COO) refers to your letter dated Friday, 8 November 2019 and provides the following information in response:

1. 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 its securities.
2. Not applicable.
3. The Company is not aware of any other explanation for the recent trading in its securities beyond matters already announced to the market.
4. The Company is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.
5. This response has been authorised and approved by the directors of the Company.

Yours sincerely

A handwritten signature in black ink, appearing to read 'David Clarke', written over a light blue horizontal line.

David Clarke
Company Secretary



8 November 2019

Reference: ODIN10450

Mr David Clarke
CEO and Company Secretary
Corum Group Limited

By email:

Dear Mr Clarke

Corum Group Limited ('COO'): Price Query

We note the change in the price of COO's securities from a low of \$0.045 to a high of \$0.082 today, 8 November 2019.

We also note the significant increase in the volume of COO's securities traded from 7 November 2019 to 8 November 2019.

Request for Information

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

1. Is COO 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 COO relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in COO's securities would suggest to ASX that such information may have ceased to be confidential and therefore COO 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 COO may have for the recent trading in its securities?
4. Please confirm that COO is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that COO'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 COO 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 **1:00 PM AEDT today Friday, 8 November 2019**. If we do not have your response by

then, ASX will likely suspend trading in COO'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, COO'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 at ListingsComplianceSydney@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 COO'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 COO'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 COO'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 COO's securities under Listing Rule 17.3.

Enquiries

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

Regards

Belinda Chiu

Senior Adviser, Listings Compliance (Sydney)