

WELLFULLY

By email: ListingsCompliancePerth@asx.com.au
Oma.Murad@asx.com.au

20 August 2021

Oma Murad
ASX Limited
Level 40, Central Park
152-158 St Georges Terrace
PERTH WA 6000

Dear Oma

WELLFULLY LIMITED – RESPONSE TO PRICE AND VOLUME QUERY

We acknowledge receipt of your letter dated 20 August 2021 with respect to the change in price and volume for the Company's securities and respond as follows:

1. The Company is not aware of any information concerning it that has not been announced to the market which, if known by some in the market, could be an explanation for the recent trading in the securities of the Company.
2. Not applicable.
3. The Company is not aware of any other explanation for the price and volume change in the securities of the Company.
4. The Company confirms that it is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.
5. The Company's responses have been authorised by the Board.

Should you require any additional information please do not hesitate to contact the Company.

Yours sincerely



John Palermo
Company Secretary

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20 August 2021

Reference: ODIN38392

Mr John Palermo
Company Secretary
Wellfully Limited
Ground Floor, 284 Oxford Street
Leederville, Western Australia 6007

By email: jp@palermo.com.au

Dear Mr Palermo

Wellfully Limited ('WFL'): Price and Volume - Query

ASX refers to the following:

- A. The change in the price of WFL's securities from a low of \$0.077 at the close of trade on 18 August 2021 to an intraday high of \$0.098 at the time of writing this letter today; and
- B. The significant increase in the volume of WFL's securities traded from 19 August 2021 to 20 August 2021

Request for information

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

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

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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 **3:00 PM AWST Friday, 20 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, WFL'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 WFL to request a trading halt immediately.

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

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 WFL'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 WFL's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

In responding to this letter, you should have regard to WFL'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 WFL'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 sincerely

Oma Murad
Listings Compliance (Perth)

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