

29 December 2023

The Australian Securities Exchange
Level 4, Rialto North Tower
525 Collins Street
Melbourne Vic 3000.

Email: ListingsComplianceMelbourne@asx.com.au

Dear Sirs,

Response to ASX Share Price Query

AVJennings Limited (ASX: AVJ) ("AVJennings" "the Company") refers to your letter dated 29 December 2023 regarding:

- A. the change in the price of AVJ's securities from yesterday close of \$0.305 to a high of \$0.345 today;
- B. The change in the price of AVJ's securities since the close 5 trading days ago from \$0.275 to a high of \$0.345 today; and
- C. The significant increase in the volume of AVJ's securities traded from 27 December 2023 to 29 December 2023.

AVJennings provides the following responses :

1. Is AVJ 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.

In responding to this question, please consider in particular whether AVJ is aware of any information that its earnings for the 6 month period ending on 31 December 2023:

- (a) are likely to differ materially (downwards or upwards) from any earnings guidance it has given for the period; or

Response: Not Applicable.

- (b) if AVJ 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 AVJ is not covered by analysts, its earnings for the prior corresponding period)?

Response: No.

2. (a) Is AVJ relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1?

Response: No.

- (b) Can an announcement be made immediately?

Response: Not Applicable.

- (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 AVJ may have for the recent trading in its securities?

Response: We are not aware of anything that would give rise to the recent trading.

4. Please confirm that AVJ is complying with the Listing Rules and, in particular, Listing Rule 3:

Response: Yes.

5. Please confirm that AVJ'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 AVJ with delegated authority from the board to respond to ASX on disclosure matters.

Response: Yes.

Yours sincerely



Carl Thompson
Company Secretary



29 December 2023

Reference: 86530

Mrs Chrishanthi Halliday
Assistant Company Secretary
AVJennings Limited
Level 4, 108 Power Street
Hawthorn VIC 3122

By email

Dear Mrs Halliday

AVJennings Limited ('AVJ'): Price - Query

ASX refers to the following:

- A. The change in the price of AVJ's securities from yesterday close of \$0.305 to a high of \$0.345 today.
- B. The change in the price of AVJ's securities since the close 5 trading days ago from \$0.275 to a high of \$0.345 today.
- C. The significant increase in the volume of AVJ's securities traded from 27 December 2023 to 29 December 2023.

Request for information

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

1. Is AVJ 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 AVJ is aware of any information that its earnings for the 6 month period ending on 31 December 2023:

- (a) are likely to differ materially (downwards or upwards) from any earnings guidance it has given for the period; or
 - (b) if AVJ 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 AVJ is not covered by analysts, its earnings for the prior corresponding period)?
2. If the answer to question 1 is "yes".
 - (a) Is AVJ relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in AVJ's securities would suggest to ASX that such information may have ceased to be confidential and therefore AVJ 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?

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3. If the answer to question 1 is “no”, is there any other explanation that AVJ may have for the recent trading in its securities?
 4. Please confirm that AVJ is complying with the Listing Rules and, in particular, Listing Rule 3.1.
 5. Please confirm that AVJ’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 AVJ 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 **2 PM AEDT Friday, 29 December 2023**. 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, AVJ’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 AVJ 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 AVJ’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 AVJ’s securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

In responding to this letter, you should have regard to AVJ’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 AVJ’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

ASX reserves the right to release all or any part of this letter, your reply and any other related correspondence between us to the market under Listing Rule 18.7A.

Kind regards

ASX Compliance