



1 May 2020

Ms Anjuli Sinniah
Senior Adviser, Listing Compliance (Perth)
Australian Securities Exchange
Level 40, Central Park
152 St Georges Terrace
PERTH WA 6000
BY EMAIL: anjuli.sinniah@asx.com.au

Dear Ms Sinniah

Neurotech International Limited (ASX: NTI) - PRICE QUERY

We refer to your letter dated 8 April 2020 querying the trading of NTI shares. In response to your questions outlined in the letter, we provide the following information:

1. The Company was aware of information concerning it that had not been announced to the market which, if known by some in the market, could explain the recent trading in the Company's securities. The information related to negotiation of a proposed heads of agreement for a strategic collaboration in respect of rights under a distribution agreement to market and sell TGA approved IgM, IgG Antibody COVID-19 testing kits in Australia, New Zealand (exclusive) and all other countries (non-exclusive) other than China ("Proposed Transaction").
2.
 - a. At the time of the negotiation of the Proposed Transaction the Company was relying on Listing Rule 3.1A not to announce the information to the market. At the time of the trading the negotiations were incomplete, and no agreement had been entered into. At that time the Company had no reason to believe that confidentiality of the negotiations had been lost.
 - b. An announcement was not able to be made immediately at the time of the trading. Accordingly, the Company contacted ASX.
 - c. An announcement was not able to be made immediately at the time of the trading for the reasons stated above. The ASX sought and the Company subsequently provided a submission to ASX in relation to the Proposed Transaction so that ASX could consider the application of Listing Rule 11 should the Proposed Transaction ultimately be undertaken. ASX has informed the Company that it would apply Listing Rule 11.1.3 to the Proposed Transaction, such that the Company would be required to re-comply with Chapters 1 and 2 of the Listing Rules if the Proposed Transaction was to be undertaken. The Company has formed the view that the regulatory burden of complying with Listing Rule 11.1.3 and re-compliance with Chapters 1 and 2 of the Listing Rules is such that the Proposed Transaction is not able to be undertaken by the Company at this time and accordingly negotiations between the parties have ended without an agreement being reached. Accordingly, an announcement is no longer

Neurotech International Ltd

ABN 73 610 205 402
Suite 5 CPC, 145 Stirling Highway
Nedlands, Western Australia 6009
www.neurotechinternational.com

relevant. The Company is continuing its search for suitable value accretive opportunities to complement its existing operations.

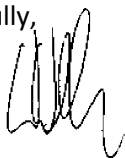
3. N/A

4. The Company confirms it is in compliance with the Listing Rules, in particular Listing Rule 3.1.

5. The Company confirms its responses to the above questions have been authorised by the Board of Directors.

Please do not hesitate to contact me if further information is required.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Winton Willesee', is written over a horizontal line.

Winton Willesee
Non-Executive Director



8 April 2020

Miss Erlyn Dale
Company Secretary

By email:

Dear Miss Dale

Neurotech International Limited ('NTI'): Price Query

We note the change in the price of NTI's securities from a close of \$0.007 to an intraday high of \$0.012 at the time of writing today.

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

Request for Information

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

1. Is NTI 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 NTI relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in NTI's securities would suggest to ASX that such information may have ceased to be confidential and therefore NTI 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 NTI may have for the recent trading in its securities?
4. Please confirm that NTI is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that NTI'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 NTI 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 **7:30 AM AWST Friday, 10 April 2020**. If we do not have your response by then, ASX will likely suspend trading in NTI'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, NTI'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 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 NTI’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 NTI’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 NTI’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 NTI’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

Anjuli Sinniah
Senior Adviser, Listings Compliance (Perth)