

8 December 2020

Melissa Lim  
Adviser, Listings Compliance (Sydney)  
ASX Limited  
20 Bridge Street  
SYDNEY NSW 2000

By email: [ListingsComplianceSydney@asx.com.au](mailto:ListingsComplianceSydney@asx.com.au)

Dear Melissa,

**Re: General - Aware Query**

We refer to your letter of 4 December 2020 to Range International Ltd (**Company**) and adopting similar paragraph numbering and defined terms as contained therein we respond as follows:

1. Yes. The Company considers Information contained in the announcement entitled "Nestle Philippines places further order for RePal pallets" to be information that a reasonable person would expect to have a material effect on the price or value of its securities.
2. Not applicable.
3. The Company became aware of the Information when it received confirmation of order on the evening of 3 December 2020.
4. The Company became aware of the Information after market closed on the evening of 3 December 2020 and made the announcement prior to market open on 4 December 2020.
5. We confirm that the Company is in compliance with the ASX Listing Rules and in particular Listing Rule 3.1.
6. We confirm that this response has been approved by the Board of Directors of the Company.

We trust this answers your queries.

Yours faithfully



**Dean Jagger**  
Company Secretary



4 December 2020

Reference: 28630

Mr Dean Jagger  
Company Secretary  
Range International Limited  
Level 5 126 Phillip Street  
Sydney NSW 2000

By email

Dear Mr Jagger

**Range International Limited ('RAN'): General – Aware Query**

ASX refers to the following:

- A. RAN's announcement entitled "Nestle Philippines places further order for RePal pallets" lodged on the ASX Market Announcements Platform and released at 8:58 AM on 4 December 2020 (the 'Announcement'), disclosing a new order valued at US\$144,100 ('Information').
- B. Listing Rule 3.1, which requires a listed entity to immediately give ASX 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.
- C. The definition of "aware" in Chapter 19 of the Listing Rules, which states that:

*"an entity becomes aware of information if, and as soon as, an officer of the entity (or, in the case of a trust, an officer of the responsible entity) has, or ought reasonably to have, come into possession of the information in the course of the performance of their duties as an officer of that entity" and section 4.4 in Guidance Note 8 Continuous Disclosure: Listing Rules 3.1 – 3.1B "When does an entity become aware of information."*

- D. Listing Rule 3.1A, which sets out exceptions from the requirement to make immediate disclosure, provided that each of the following are satisfied.

*"3.1A Listing rule 3.1 does not apply to particular information while each of the following is satisfied in relation to the information:*

*3.1A.1 One or more of the following applies:*

- *It would be a breach of a law to disclose the information;*
- *The information concerns an incomplete proposal or negotiation;*
- *The information comprises matters of supposition or is insufficiently definite to warrant disclosure;*
- *The information is generated for the internal management purposes of the entity; or*
- *The information is a trade secret; and*

*3.1A.2 The information is confidential and ASX has not formed the view that the information has ceased to be confidential; and*

*3.1A.3 A reasonable person would not expect the information to be disclosed."*

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- E. ASX's policy position on the concept of "confidentiality", which is detailed in section 5.8 of Guidance Note 8 *Continuous Disclosure*: Listing Rules 3.1 – 3.1B. In particular, the Guidance Note states that:

*"Whether information has the quality of being confidential is a question of fact, not one of the intention or desire of the listed entity. Accordingly, even though an entity may consider information to be confidential and its disclosure to be a breach of confidence, if it is in fact disclosed by those who know it, then it ceases to be confidential information for the purposes of this rule."*

### **Request for information**

Having regard to the above, ASX asks RAN to respond separately to each of the following questions and requests for information:

1. Does RAN consider the Information to be information that a reasonable person would expect to have a material effect on the price or value of its securities?
2. If the answer to question 1 is "no", please advise the basis for that view.
3. When did RAN first become aware of the Information?
4. If the answer to question 1 is "yes" and RAN first became aware of the Information before the relevant date, did RAN make any announcement prior to the relevant date which disclosed the information? If so, please provide details. If not, please explain why this information was not released to the market at an earlier time, commenting specifically on when you believe RAN was obliged to release the information under Listing Rules 3.1 and 3.1A and what steps RAN took to ensure that the information was released promptly and without delay.
5. Please confirm that RAN is complying with the Listing Rules and, in particular, Listing Rule 3.1.
6. Please confirm that RAN's responses to the questions above have been authorised and approved in accordance with its published continuous disclosure policy or otherwise by its board or an officer of RAN 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 **9:00AM AEDT Wednesday, 9 December 2020**. 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, RAN'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 RAN to request a trading halt immediately.

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.

### **Trading halt**

If you are unable to respond to this letter by the time specified above, you should discuss with us whether it is appropriate to request a trading halt in RAN's securities under Listing Rule 17.1. If you wish a trading halt, you must tell us:

- the reasons for the trading halt;

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- 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 RAN's securities under Listing Rule 17.3.

### **Listing Rules 3.1 and 3.1A**

In responding to this letter, you should have regard to RAN'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 RAN'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.

Kind regards

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**Melissa Lim**  
Adviser, Listings Compliance (Sydney)