

28 January 2025

The Manager  
Australian Securities Exchange  
Exchange Centre  
20 Bridge Street  
Sydney NSW 2000

Attention: Stuart Roberts, Advisor, Listing Compliance  
By email

Dear Sir

I refer to your query letter dated 28 January 2025 and advise as follows in response to the questions raised:

1. **Is AJL 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?**

No.

2. **2. If the answer to question 1 is "yes".**

- (a) **Is AJL relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in AJL's securities would suggest to ASX that such information may have ceased to be confidential and therefore AJL 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.**

N/A.

- (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).**

N/A.

- (c) **If an announcement cannot be made immediately, why not and when is it expected that an announcement will be made?**

N/A.

3. **If the answer to question 1 is “no”, is there any other explanation that AJL may have for the recent trading in its securities?**

The Company is not aware of any specific explanation related to the Company for the recent price increase and increase in volume of shares traded. It's noted that the value of trading at 11:50am was below \$90,000 for the day.

4. **4. Please confirm that AJL is complying with the Listing Rules and, in particular, Listing Rule 3.1.**

Confirmed

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

Confirmed

Yours Sincerely

A handwritten signature in black ink, appearing to read "M. Swierkowski".

Marcin Swierkowski  
Company Secretary

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28 January 2025

Reference: 105519

Mr Marcin Swierkowski  
Company Secretary  
AJ Lucas Group Limited  
Level 22, 167 Eagle St, Brisbane QLD 4001

By email: marcin.swierkowski@lucas.com.au

Dear Mr Swierkowski

### **AJ Lucas Group Limited ('AJL'): Price - Query**

ASX refers to the following:

- A. The change in the price of AJL's securities from a low of \$0.009 at the close of trading on 24 January 2025 to a high of \$0.021 today.

### **Request for information**

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

1. Is AJL 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 AJL relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in AJL's securities would suggest to ASX that such information may have ceased to be confidential and therefore AJL 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 AJL may have for the recent trading in its securities?
4. Please confirm that AJL is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that AJL'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 AJL 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 Tuesday, 28 January 2025**. 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

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within the exceptions mentioned in Listing Rule 3.1A, AJL'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 AJL 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, 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 AJL'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 AJL's securities under Listing Rule 17.3.

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

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

Yours sincerely

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ASX Compliance