



6 January 2025

The Manager
ASX Compliance

Cyclopharm Ltd
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Kingsgrove NSW 2208 Australia
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By email: ListingsComplianceSydney@asx.com.au

Response to ASX Price – Query

We refer to your letter of 6 January 2025 regarding an increase in the price and volume of trading in the securities of the Company today and respond to your queries as follows:

- 1. Is CYC 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. If the answer to question 1 is “yes”.**
 - (a) Is CYC relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in CYC’s securities would suggest to ASX that such information may have ceased to be confidential and therefore CYC 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?**

Not applicable.

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

No. The Company is carrying on business in the ordinary course in accordance with its disclosed strategic direction and commercialisation plan.

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

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

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

The Company confirms that its responses to the questions above have been authorised and approved under its published continuous disclosure policy.

Yours faithfully

A handwritten signature in black ink, appearing to read "James McBrayer". The signature is written in a cursive style with a large, stylized initial 'J'.

Mr James McBrayer
Managing Director



6 January 2025

Reference: ODIN104987

Mr Craig Beatton & Ms Caryn Cheah
Communication Person
Cyclopharm Limited
Unit 4 1 The Crescent
KINGSGROVE NSW 2208

By email

Dear Mr Beatton & Ms Cheah

Cyclopharm Limited ('CYC'): Price - Query

ASX refers to the following:

- A. The change in the price of CYC's securities from a low of \$1.65 to a high of \$2.23, today, 6 January 2025.
- B. The significant increase in the volume of CYC's securities traded today.

Request for information

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

1. Is CYC 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 CYC relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in CYC's securities would suggest to ASX that such information may have ceased to be confidential and therefore CYC 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 CYC may have for the recent trading in its securities?
4. Please confirm that CYC is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that CYC'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 CYC 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 **3:00 PM AEDT on Monday, 6 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 within the exceptions mentioned in Listing Rule 3.1A, CYC'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 CYC 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 CYC'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 CYC's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

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

Regards

ASX Compliance