

31 October 2017

ASX Market Announcements  
ASX Securities Exchange Limited  
20 Bridge Street  
Sydney NSW 2000

Attention: Andrew Kabega

**Re: First Growth Funds Limited ("FGF"): price query**

We refer to your letter dated 31 October 2017 to First Growth Funds Limited (ASX:FGF) (**Company**) regarding a change in the Company's share price from 30 October 2017 to 31 October 2017 and the volume increase on 31 October 2017.

In light of the price change, you have asked the Company to respond to five questions. The Company's response to each question is set out below.

1. No
2. Not applicable.
3. As previously announced the board is actively reviewing several investment opportunities across a number of sectors, including in the emerging markets of **blockchain technology**, conversion of **energy to currency** and the use of **crypto currencies** to fund these initiatives.

The Company also notes that other ASX listed companies with a particular focus in Blockchain, Digital Assets and crypto currency have recently had an increase in volume and share price.

4. The Company confirms it is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.
5. The Company confirms that its responses to the questions above have been authorised and approved by its board.

Yours sincerely

Geoff Barnes  
Chairman



31 October 2017

Julie Edwards  
Company Secretary  
First Growth Funds Limited  
C/- Peloton Capital  
Level 5  
56 Pitt Street  
Sydney NSW 2000

By email: [juliee@lowell.net.au](mailto:juliee@lowell.net.au)

Dear Ms Edwards,

**First Growth Funds Limited ("FGF"): price query**

We note the change in the price of FGF's securities from a close of \$0.009 on 30 October 2017 to a close of \$0.012 today 31 October 2017.

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

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

1. Is FGF 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 FGF relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1?

Please note that the recent trading in FGF's securities would suggest to ASX that such information may have ceased to be confidential and therefore FGF 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 FGF may have for the recent trading in its securities?
4. Please confirm that FGF is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.

5. Please confirm that FGF'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 FGF 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, and in accordance with, Listing Rule 18.7. Your response is required as soon as reasonably possible and, in any event, by not later than half an hour before the start of trading (ie before 9.30 am AEST on 1 November 2017. If we do not have your response by then, ASX will have no choice but to consider suspending trading in FGF'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, FGF'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. 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 FGF'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 FGF'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 FGF'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*.

If you have any queries or concerns about any of the above, please contact me immediately.

Yours sincerely

*[Sent electronically without signature]*

Andrew Kabega  
Senior Adviser, Listings Compliance