

19 September 2019

Dean Litis
ASX Limited
Level 4, North Tower, Rialto Towers
525 Collins St
MELBOURNE VIC 3000

Dear Mr Litis,

ISIGNTHIS LTD (ASX: ISX)

I refer to your letter dated 19 September 2019 in regard to the volume traded and the change in price of the securities of iSignthis Ltd (Entity) that has occurred since close of trade on 18 September 2019 and current trading on 19 September 2019.

Using the numbering outlined in your letter, the Entity responds to the questions outlined in your correspondence as follows;

1. No. The Company has made announcements in accordance with continuous disclosure requirements. The latest update on GPTV dated 9th September 2019 remains supportive of the earnings guidance. The Company has also addressed the purported governance issues raised by Ownership Matters in their report dated 10 September 2019, which are unsubstantiated and refuted by the Company.

There have been no changes to operations and the business continues to strengthen as per operational updates provided.

With specific reference to the questions raised in your letter, please note the following;

- (a) The article in today's Australian Financial Review refers to a dispute between historical (pre listing) shareholders and the former company iSignthis Ltd incorporated in the BVI, which held the assets acquired by the ASX listed iSignthis Ltd. This matter will be dealt with by Mr Karantzis and has no impact on the operations of iSignthis Ltd, it's shares on issue and cost base.
- (b) The Australian Stock Exchange listed iSignthis Ltd is not a party to the legal action, with the article in the Australian Financial Review (AFR) failing to distinguish adequately between the BVI and Australian entities. The AFR title "*iSignthis defends share dispute brought by investor*" is misleading, as it is an action brought by one set of shareholders against another.
- (c) The Company continues to operate as noted in the Half Yearly Accounts and as per the announcement made on 28 August 2019. It will provide guidance updates based on information available per its continuous disclosure obligations.

2. Not applicable.
3. No.
4. The Entity considers that it is in compliance with the ASX Listing Rules including Listing Rule 3.1.
5. We confirm that this is the case.

Yours Sincerely



Todd Richards
Company Secretary



19 September 2019

Reference: ODIN

Mr Todd Richards
Company Secretary
iSignthis Ltd
456 Victoria Parade
East Melbourne VIC 3002

By email: todd.richards@isignthis.com

Dear Mr Richards

ISIGNTHIS LIMITED ('ISX'): Price Query

We note the change in the price of ISX's securities from a closing price of \$1.01 yesterday, 18 September 2019 to a low of \$0.66 at the time of writing today.

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

We also refer to the fact that ISX responded to an ASX Price Query letter dated 12 September 2019 on 13 September 2019.

Request for Information

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

1. Is ISX 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?

In responding to this question, please address and consider:

- (a) the reference in today's Australian Financial Review entitled *iSignthis defends share dispute brought by early investor* by John Shapiro and Vesna Poljak which refers to Federal Court proceedings brought against iSignthis Ltd BVI and John Karantzis;
 - (b) whether ISX is aware of any information that its earnings guidance provided in its announcement of 28 August 2019, 'Half Yearly Report and Accounts', is likely to differ materially (downwards or upwards).
2. If the answer to question 1 is "yes".
 - (a) Is ISX relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in ISX's securities would suggest to ASX that such information may have ceased to be confidential and therefore ISX 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?

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3. If the answer to question 1 is “no”, is there any other explanation that ISX may have for the recent trading in its securities?
 4. Please confirm that ISX is complying with the Listing Rules and, in particular, Listing Rule 3.1.
 5. Please confirm that ISX’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 ISX 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 AEST Thursday, 19 September 2019**. If we do not have your response by then, ASX will likely suspend trading in ISX’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, ISX’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 ListingsComplianceMelbourne@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 ISX’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 ISX’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 ISX’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 ISX's securities under Listing Rule 17.3.

Enquiries

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

Yours sincerely

Dean Litis
Principal Adviser, Listings Compliance (Melbourne)