

21 October 2019

Mr Dean Litis  
Principal Adviser, Listings Compliance  
ASX Limited  
Collins Street,  
Melbourne, Vic, 3000

Dear Mr Litis,

**IODM LIMITED ('IOD') : REFERENCE ODIN09273**

We refer to ASX's query dated 21 October 2019 in relation to the movement in the price of the IOD securities.

- 1. Is IOD aware of any information concerning it that has not been announced the market which, if known by some in the market, could explain the recent trading in its securities?**

No

- 2. N/A**

- 3. Is there any other explanation that IOD may have for the recent trading in its securities?**

While the directors do not comment on share price movements or valuation, they do note that the last disclosure that was made on the 25<sup>th</sup> of September 2019 concerned the signing of a reciprocal referral arrangement with Western Union, who is a global leader in cross-currency money movement and has operations in more than 200 countries. We further announced that we were initially focusing on Asia Pacific and the UK and that Western Union believes that our product works well with their platform. Since this announcement, we have accelerated that focus and confirm that previous disclosures are true and correct. Moreover, the directors are aware of their obligations regarding disclosures and will provide updates on this relationship, and other matters, as they are warranted.

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

IOD confirms that it is in compliance with the Listing Rules and, in particular, Listing Rule 3.1

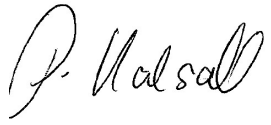
- 5. Please confirm that IOD's responses to that questions above have been authorised and approved in accordance with its published continuous disclosure policy or otherwise by its board or an officer of IOD with delegated authority from the board to respond to ASX on disclosure matters.**

The responses to the questions above have been authorised and approved by the board

IOD does not have any other information at this time (other than as disclosed above).



Yours faithfully,

A handwritten signature in black ink, appearing to read 'P. Halsall'. The signature is written in a cursive style with a large initial 'P'.

**Petrina Halsall**

**Company Secretary**

**IODM Limited**



21 October 2019

Reference: ODIN09273

Ms Petrina Hassall  
Company Secretary  
IODM Limited  
Level 5, 22 Albert Road  
South Melbourne VIC 3205

By email

Dear Ms Hassall

### **IODM Limited ('IOD'): Price Query**

We note the change in the price of IOD's securities from a low of \$0.165 on 14 October 2019 to a high of \$0.305 at the time of writing today.

### **Request for Information**

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

1. Is IOD 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 IOD relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in IOD's securities would suggest to ASX that such information may have ceased to be confidential and therefore IOD 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 IOD may have for the recent trading in its securities?
4. Please confirm that IOD is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that IOD'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 IOD 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 **2:00pm AEDT today Monday, 21 October 2019**. If we do not have your response by then, ASX will likely suspend trading in IOD'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

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does not fall within the exceptions mentioned in Listing Rule 3.1A, IOD'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](mailto: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 IOD'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 IOD'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 IOD'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 IOD's securities under Listing Rule 17.3.

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**Enquiries**

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

Yours sincerely

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**Dean Litis**

Principal Adviser, Listings Compliance (Melbourne)