



**Fatfish Group Limited**  
(ACN 004 080 460)  
Level 4, 91 William Street  
Melbourne VIC 3000  
Australia

[www.fatfish.co](http://www.fatfish.co)

15 February 2021

Ms Isabelle Andrews  
Senior Adviser, Listings Compliance  
ASX Limited

By email: [Isabelle.andrews@asx.com.au](mailto:Isabelle.andrews@asx.com.au)  
[listingscomplianceperth@asx.com.au](mailto:listingscomplianceperth@asx.com.au)

Dear Isabelle,

In response to your correspondence of 12 February 2021 regarding the increased volume and price of Fatfish Group Limited ("FFG") securities, please find the following:

1. FFG is not aware of any information concerning the Company that has not been announced to the market, which, if known by some in the market, could explain the recent trading in its securities.

However, FFG is aware that iCandy Interactive Limited (**ICI**) (which FFG has an approx. 33% interest in) was in negotiations dispose a subsidiary to RightBridge Ventures AB, (which FFG has an approx. 50.1% interest in via its interest in Abelco Investments Group AB). As this transaction does not result in any material change in FFG's interest in ICI, FFG does not consider this information has any material effect on the value of FFG's shares or the recent trading in its securities.

ICI has made the relevant announcement and the announcement has been cross referenced on FFG's announcement platform.

2. Not applicable.
3. Other than as noted below, FFG is not aware of any other specific information which would explain the recent increase in price and volume of the Company's securities.

FFG however notes that on 3 February 2020, it announced that its Singaporean based investee company, Smartfunding Pte Ltd, had completed the development of its online Buy-Now-Pay-Later (**BNPL**) platform in preparation for the roll out of its BNPL services on **18 February 2021**.



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FFG further notes that some ASX listed companies in the BNPL space have experienced recent strong demand and increases in prices, especially company(s) involved in the Asian geographical market.

4. The Company confirms that it is in compliance with the Listing Rules, and in particular, Listing Rule 3.1.
5. The Company confirms that the above responses have been authorised and approved in accordance with its published continuous disclosure policy and the Board.

Yours Faithfully

A handwritten signature in blue ink, appearing to read 'Jiahui Lan', is positioned above the printed name and title.

Jiahui Lan  
Company Secretary



12 February 2021

Reference: ODIN30803

Ms Jiahui Lan  
Company Secretary  
Fatfish Group Limited  
C/- DW Accounting & Advisory Pty Ltd  
Level 4, 91 William Street  
Melbourne VIC 3000

By email: [jiahui@dwaccounting.com.au](mailto:jiahui@dwaccounting.com.au)

Dear Ms Lan

**Fatfish Group Limited ('FFG'): Price - Query**

ASX refers to the following:

- A. The change in the price of FFG's securities from a low of \$0.036 to an intra-day high of \$0.055 in the last few days.
- B. The significant increase in the volume of FFG's securities traded from 11 February 2021 to 12 February 2021.

**Request for information**

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

1. Is FFG 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 FFG relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in FFG's securities would suggest to ASX that such information may have ceased to be confidential and therefore FFG 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 FFG may have for the recent trading in its securities?
4. Please confirm that FFG is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that FFG'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 FFG with delegated authority from the board to respond to ASX on disclosure matters.

**When and where to send your response**

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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 **12:20 PM AWST Friday, 12 February 2021**. 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, FFG'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 FFG to request a trading halt immediately.

Your response should be sent to me by e-mail at **ListingsCompliancePerth@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 FFG'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 FFG's securities under Listing Rule 17.3.

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

In responding to this letter, you should have regard to FFG'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 FFG'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**

We reserve the right to release a copy of this letter, your reply and any other related correspondence between us to the market under Listing Rule 18.7A.

### **Questions**

If you have any questions in relation to the above, please do not hesitate to contact me.

Kind regards

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**Isabelle Andrews**  
Senior Adviser, Listings Compliance (Perth)