



Holdings Limited

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Non-Executive Chairman

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Peter Wall

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Company Secretary

Scott Mison

ASX Code: ZYB

17 November 2017

Isabelle Andrews

Adviser, Listing Compliance Perth
Australian Securities Exchange Limited
Level 40, Central Park 152-158
St Georges Terrace Perth WA 6000

Dear Isabelle,

ASX Response Letter in relation to Price Query

I refer to the Letter sent from ASX on 17 November 2017 in regards to the increase in price and in the volume.

In response to your questions (using your numbering), we advise as follows:

1. No, however as outlined in the Quarterly Activities Report released to the market on 31 October 2017, the Company continues to review new commercial opportunities both within the cyber security space and in other sectors, with a view to ensuring the best outcome possible for all shareholders. Discussions are ongoing in this respect, however nothing has been finalized or is announceable at this time. The Company continues with the development of the Zyber technology.
2. Not applicable.
3. Beyond the comments made in point one, there is no further explanation for the recent trading in Zyber securities that the Company is aware of.
4. Zyber confirms that it is in compliance with the Listing Rules, and in particular Listing Rule 3.1.
5. The above responses have been approved by the majority of the board.

Scott Mison
Company Secretary / Director



17 November 2017

Mr Scott Mison
Company Secretary
Zyber Holdings Limited
Level 11, London House
216 St George's Terrace
Perth WA 6000

By email:

Dear Mr Mison

Zyber Holdings Limited ("ZYB"): price and volume query

We note the change in the price of ZYB's securities from a low of \$0.07 to an intraday high of \$0.11 today 17 November 2017.

We also note the significant increase in the volume of ZYB's securities traded today 17 November 2017.

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

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

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

5. Please confirm that ZYB'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 ZYB 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 12.00 pm WST on 17 November 2017. If we do not have your response by then, ASX will have no choice but to consider suspending trading in ZYB'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, ZYB'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 tradinghaltsperth@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 ZYB'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 ZYB'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 ZYB'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]

Isabelle Andrews

Adviser Listings Compliance

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