

ShareRoot

20 July 2018

Mr Ben Secrett
Principal Adviser, ASX Listings Compliance
ASX Compliance Pty Limited
Level 40, Central Park
152 -158 St Georges Tce
PERTH WA 6000

By Email: ben.secrett@asx.com.au
Tradinghaltsperth@asx.com.au

Dear Mr Secrett

SHAREROOT LIMITED (THE "COMPANY") – PRICE AND VOLUME QUERY

With reference to your letter dated 19 July 2018 and with specific reference to your queries contained therein, we advise as follows:

1. No, the Company is not 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 trading in the Company's securities.
2. Not applicable.
3. The Company recently launched the MediaConsent beta program, in accordance with the timetable previously announced to the ASX on 25 May 2018 and as announced to the ASX as part of the Company's update released on 26 June 2018. The Company is not aware of any other information concerning it that has not been announced which, if known, could be an explanation for recent trading in the securities of the Company.
4. The Company confirms that it is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.
5. The responses as noted above have been authorised and approved by the Board of Directors.

For and on behalf of the Board,



Andrew Bursill
Company Secretary

19 July 2018

Mr Andrew Bursill

Shareroot Ltd
Suite 2, Level 10, 70 Phillip Street
SYDNEY NSW 2000

By email

Dear Mr Bursill

SHAREROOT LTD ("SRO"): PRICE & VOLUME QUERY

We note the change in the price of SRO's securities from a closing price of \$0.006 yesterday, 18 July 2018 to an intra-day high at the time of writing of \$0.008 today, 19 July 2018.

We also note the increase in the volume of SRO's securities traded today to a level significantly above the average daily volume.

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

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

Please note that the recent trading in SRO's securities would suggest to ASX that such information may have ceased to be confidential and therefore SRO 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 SRO may have for the recent trading in its securities?
4. Please confirm that SRO is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that SRO'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 SRO 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 7.00am AWST tomorrow, Friday, 20 July 2018**. If we do not have your response by then, ASX will have no choice but to consider suspending trading in SRO'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, SRO'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 tradinghaltspert@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 SRO'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 SRO'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 SRO's securities under Listing Rule 17.1.

If you wish to request 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*.

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

Kind regards

[Sent electronically without signature]

Ben Secrett

Principal Adviser, Listings Compliance (Perth)