



**Fatfish Internet Group Ltd**  
(ACN 004 080 460)  
Level 4, 91 William Street  
Melbourne  
Victoria 3000  
Australia  
[www.fatfish.co](http://www.fatfish.co)

8 October 2018

Ms Penelope Reid  
Adviser, Listings Compliance  
ASX Compliance Pty Ltd

**Email:** [penelope.reid@asx.com.au](mailto:penelope.reid@asx.com.au)  
**Copy:** [tradinghaltsperth@asx.com.au](mailto:tradinghaltsperth@asx.com.au)

Dear Ms Reid

### **Response to price query**

Fatfish Internet Group Limited (the **Company**) refers to the ASX price and volume query dated 5 October 2018 and responds as follows (using your numbering):

1. Fatfish Internet Group Limited (the **Company**) is not aware of any information concerning it which has not been announced to the market which, if known by some in the market, could explain the recent trading in its securities.
2. Not applicable.
3. The Company is not aware of any other specific information which would explain the recent increase in price in the Company's securities. The Company wishes to note that it is of the opinion that the recent increase in price in the Company's securities is within the securities' trading range, and does not represent unusual trading activities.

Further, the Company holds a minority investment interest in Kryptos-X Pte. Ltd. (**Kryptos-X**), a private Singaporean incorporated company that is in the process of establishing an online digital currency exchange. The Company had previously announced that it anticipated the exchange to be launched in Q3 2018, after final testing is completed and final regulatory requirements are met. This launch has been delayed. The Company confirms that it is not aware of when the Kryptos-X exchange will launch. The Company will make a further announcement once it has received confirmation from Kryptos-X on when the exchange will be launched.

The Company understands that on or about 3 October 2018, there was a Tweet on Twitter about the upcoming launch of the digital currency exchange of Kryptos-X. This tweet was removed shortly afterwards after



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Kryptos-X decided to remove it for various reasons. The Tweet was not made on the official Kryptos-X Twitter account. The Tweet was made by an officer of the Company who is also consulting with Kryptos-X. The Company has confirmed that the tweet was made by the officer in his capacity in Kryptos-X and not on behalf of the Company. The Company has no prior knowledge and authority over the Tweet nor Kryptos-X's social media activities.

In general, the Company does not comment and has no control over its investee companies' advertising and marketing activities, especially in investee companies that the Company has a minority stake in. When Kryptos-X is planning for a launch, the Company anticipates Kryptos-X to scale up its marketing activities in the public domain, in which the Company has no control or prior visibility on.

The Company has adopted a suite of corporate governance policies, including a Shareholder Communications Policy and a Continuous Disclosure Policy. The policies are available on the Company's website. The directors and officers of the Company, including key management, have been reminded of these policies. Any breaches of these policies may result in disciplinary action, up to and including termination of employment or engagement.

4. The Company confirms that it is 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

Jiahui Lan  
Company Secretary



5 October 2018

**Ms Jiahui Lan**

Company Secretary  
Fatfish Internet Group Ltd  
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 Internet Group Ltd (“FFG”): price query**

We note the change in the price of FFG’s securities from a low of \$0.017 to a high of \$0.021 on 4 October 2018.

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 in compliance 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 in accordance with 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**

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 **11 am WST on 5 October 2018**. If we do not have your response by then, ASX will have no choice but to consider suspending trading in FFG’s securities under Listing Rule 17.3.

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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.

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](mailto: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 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.

### **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 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]*

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**Penelope Reid**

Adviser, Listings Compliance (Perth)