

30 April 2019

Penelope Reid Adviser ASX Compliance Pty Ltd Level 40, Central Park 152-158 St Georges Terrace Perth WA 6000

By e-mail: Penelope.reid@asx.com.au

Dear Penelope,

RE: Response to ASX Price Query

Vonex Limited (ASX: VN8, VN8O) (**Vonex** or the **Company**) refers to your Price Query letter dated 30 April 2019 and provides the following responses:

- 1. No.
- 2. Not applicable.
- 3. The Company notes the following additional factors that may also explain the recent trading in its securities:
 - a. Development of the Oper8tor App is on-going. An article published on the "Next Tech Stock" website on 29 April 2019 titled "Mirror, Mirror on The Wall: Who's The Greatest App of Them All?" in relation to Vonex's Oper8tor App and its applicability to the growing pursuit of connectivity and multi-networking of social media platforms. The article can be accessed through the Company's website at https://www.vonex.com.au/news/; and
 - b. Vonex is on pace to exceed 28,000 Registered Active PBX Users as Vonex continues to penetrate the multibillion-dollar Australian market for telco services to small and medium enterprises.
- 4. The Company confirms the responses to the questions above are authorised and approved in accordance with its published continuous disclosure policy.
- 5. The Company confirms that the Company's response has been authorised and approved by officers of the Company that have delegated authority from the Board to respond to ASX disclosure matters.

Faithfully,

Matthew Foy Company Secretary Vonex Limited



About Vonex

Vonex is a full service, award-winning telecommunications service provider selling mobile, internet, traditional fixed lines, and hosted PBX and VoIP services - predominately to the small to medium enterprise ("SME") customer under the Vonex brand. The Company also provides wholesale customers, such as internet service providers, access to the core Vonex PBX and call termination services at wholesale rates via a white label model.

Vonex also develops new technologies in the telecommunications industry, including a feature-rich cloud-hosted PBX system. Vonex is also developing the Oper8tor App, a multi-platform real-time voice, messaging and social media app that allows users to connect with all social media friends, followers and contacts across different social medias, all consolidated into one app.



30 April 2019

Reference: ODIN01065

Mr Nicholas Ong Company Secretary Vonex Limited Level 8, 99 St Georges Terrace PERTH WA 6000

By email: nicholas.ong@minervacorporate.com.au

Dear Mr Ong

Vonex Limited ('VN8'): Price Query

We note the change in the price of VN8's securities from a closing of \$0.10 on Friday 26 April 2019 to an intraday high of \$0.165 today, Tuesday 30 April 2019.

Request for Information

In light of this, ASX asks VN8 to respond separately to each of the following questions and requests for information:

- 1. Is VN8 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 VN8 relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in VN8's securities would suggest to ASX that such information may have ceased to be confidential and therefore VN8 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 VN8 may have for the recent trading in its securities?
- 4. Please confirm that VN8 is complying with the Listing Rules and, in particular, Listing Rule 3.1.
- 5. Please confirm that VN8'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 VN8 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 **11:25 AM AWST today Tuesday**, **30 April 2019**. If we do not have your response by then, ASX will likely suspend trading in VN8'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, VN8'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 <u>ListingsCompliancePerth@asx.com.au</u>. 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 VN8'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 VN8'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 VN8'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 VN8's securities under Listing Rule 17.3.

Enquiries

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

Yours sincerely

Penelope Reid

Adviser, Listings Compliance (Perth)