

18 September 2019

Isabelle Andrews  
Senior Advisor, Listings Compliance (Perth)  
Australian Securities Exchange

BY EMAIL: [ListingsCompliancePerth@asx.com.au](mailto:ListingsCompliancePerth@asx.com.au)

### ASX price query

We refer to the letter from ASX to DXN Limited (ASX: DXN) (**DXN** or the **Company**) dated 18 September 2019 regarding a price query by ASX (**ASX Letter**).

We respond to the questions raised by ASX in the ASX Letter as follows:

1. *Is DXN 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?*

No

2. *If the answer to question 1 is “yes”:*

- a) *Is DXN relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1?*

Not applicable

- b) *Can an announcement be made immediately?*

Not applicable

- c) *If an announcement cannot be made immediately, why not and when is it expected that an announcement will be made?*

Not applicable

3. *If the answer to question 1 is “no”, is there any other explanation that DXN may have for the recent trading in its securities?*

As disclosed to the market on 16 September 2019, the Company has officially opened the Data Centre at Sydney Olympic Park.

Currently, DCD Singapore is on (across 17 and 18 September 2019) and one of the Company's Non-Executive Directors, John Duffin is a presenter at the conference. In addition, Shalini Lagrutta, the Company's Head of Global Infrastructure Sales, is part of a panel fielding questions.

As disclosed on 19 August 2019, the Company's next milestone is the Tier Certification of Constructed Facility (TCCF) of the Sydney Data Centre by the independent specialist, Uptime Institute. The Tier III TCCF audit took place in late August 2019, with the Company waiting for the Uptime Institute to provide the Company with its TCCF.

Other than the information that has already been announced to the market, the Company is not aware of any other explanation for the recent trading in its securities.

4. *Please confirm that DXN is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.*

The Company is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.

5. *Please confirm that DXN'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 DXN with delegated authority from the board to respond to ASX on disclosure matters.*

We confirm that DXN's responses above to the questions in the ASX Letter have been authorised and approved by an officer of DXN with delegated authority from the Board to respond to ASX on disclosure matters.

On behalf of the Board

George Lazarou  
Company Secretary



18 September 2019

Reference: ODIN07314

Mr George Lazarou  
Company Secretary  
DXN Limited  
Level 28 AMP Tower 140 St Georges Terrace  
Perth WA 6000

By email:

Dear Mr Lazarou

### **DXN Limited ('DXN'): Price Query**

We note the change in the price of DXN's securities from a low of \$0.06 to an intra-day high of \$0.071 today.

We also note the significant increase in the volume of DXN's securities traded today.

### **Request for Information**

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

1. Is DXN 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 DXN relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in DXN's securities would suggest to ASX that such information may have ceased to be confidential and therefore DXN 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 DXN may have for the recent trading in its securities?
4. Please confirm that DXN is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that DXN'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 DXN 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 **1 PM AWST today Wednesday, 18 September 2019**. If we do not have your response by then, ASX will likely suspend trading in DXN'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

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and it does not fall within the exceptions mentioned in Listing Rule 3.1A, DXN'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 [ListingsCompliancePerth@asx.com.au](mailto: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.

### **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 DXN'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 DXN'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 DXN'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 DXN'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

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