

6 July 2023

Laura Gomme
Adviser, Listing Compliance (Perth)
Australian Securities Exchange
Level 40, Central Park
152 St Georges Terrace
Perth WA 6000

By email: ListingsCompliancePerth@asx.com.au; laura.gomme@asx.com.au

Dear Ms Gomme,

ARCHTIS LIMITED (ASX:AR9) – RESPONSE TO PRICE QUERY

We refer to your letter dated 6 July 2023 in which you queried the recent trading in archTIS Limited (the “Company”) shares.

In response to your questions outlined in the letter, we provide the following information:

1. The Company published the Press Release entitled “archTis awarded \$270,000 contract with an Australian University to extend NC Protect Capabilities” at 6:15am WST on 6 July 2023.
2. 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 recent trading in the Company’s securities.
3. Not applicable.
4. On 29 June 2023, the Company announced that it had won material contract with the Department of Defence, with a total contract value of \$4.06 million.

On 5 July 2023, the Company announced that it had signed a contract with the Bank of Finland with a total contract value of \$235,291. On 6 July 2023, the Company announced via a press release that it had also signed a contract with an Australian University with a total contract value of \$270,000.

Collectively, these contract wins demonstrate strong revenue growth opportunities, and further validate the Company’s product offering and ability to win competitive tenders.

5. No.
6. The Company considers the contract with the Australian University to be non-price sensitive on the basis that it represents less than 10% of the Company’s FY2023 revenue and contains no other terms that would otherwise cause it to be considered material or price sensitive.

7. The Company confirms it is in compliance with the Listing Rules, in particular Listing Rule 3.1.
8. The Company confirms its responses to the above questions have been authorised and approved by an officer with delegated authority by the Board to respond to ASX on disclosure matters.

Yours sincerely,

A handwritten signature in black ink that reads 'E Dawson'.

Erlyn Dawson
Company Secretary



6 July 2023

Reference: 76117

Ms Eryln Dawson
archTIS Limited
Level 3, archTis House
10 National Circuit
Barton ACT 2600

By email: erlyn@azc.com.au

Dear Ms Dawson

archTIS Limited ('AR9'): Price Query

ASX refers to the following:

- A. AR9's announcement entitled "archTis Awarded Contract with Bank of Finland for NC Protect" lodged on the ASX Market Announcement Platform ('MAP') on 5 July 2023 at 8.48am AEST, and not marked price sensitive, which contained the following disclosure:

archTis Limited, a global provider of data-centric software solutions for the secure collaboration of sensitive information, today announced that the Company has signed a new agreement with the Bank of Finland, an existing customer, to license NC Protect and the NC Encrypt module. The purchase migrates Bank of Finland from the previously acquired cp.Protect offering.

The Bank of Finland signed a total contract value of A\$235,291 (€143,660) of which A\$51,787, is for annual recurring licensing revenue (ARR) across a four-year period with the ability to purchase additional licences during the contract period. The Bank of Finland may terminate or partially terminate the contract at its discretion by 30 days prior written notice but will be liable for any fees or costs due for the balance of the contract period in any such event.

('MAP Announcement')

- B. AR9's press release entitled "archTis awarded \$270,000 contract with an Australian University to extend NC Protect Capabilities" released on AR9's website on 5 July 2023 which contained the following disclosure:

'archTis Limited, a global provider of data-centric software solutions for the secure collaboration of sensitive information, today announced that the Company has signed an agreement with an Australian university to extend NC Protect capabilities to data in Microsoft Power Business Intelligence (Power BI).

As a current archTIS client the university has seen the value in extending NC Protect's data-centric access controls from unstructured data (Microsoft documents) in SharePoint to structured data (data held in databases) managed by Power BI. This contract is to provide services to the value of \$270,000 to extend NC Protect functionality to Power BI. This project will open new opportunities for NC Protect in the business intelligence market.

('Press Release')

ASX notes that the contract value of the agreement subject of the MAP Announcement was less than the contract value of the agreement the subject of the Press Release.

- C. The change in the price of AR9's securities from a low of \$0.082 on 5 July 2023 to a closing price of \$0.085 on 5 July 2023.

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- D. The change in the price of AR9's securities from an opening price of \$0.088 on 6 July 2023 to an intraday high of \$0.11 on 6 July 2023.
- E. The significant increase in the volume of AR9's securities traded on 6 July 2023.

Request for information

In light of this, ASX asks AR9 to respond separately to each of the following questions and requests for information:

1. When did AR9 publish the Press Release? Please specify the date and time of the release of the Press Release.
2. Is AR9 aware of any information concerning it that has not been announced to the market on MAP which, if known by some in the market, could explain the recent trading in its securities on 6 July 2023?
3. If the answer to question 2 is "yes".
 - (a) Is AR9 relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in AR9's securities would suggest to ASX that such information may have ceased to be confidential and therefore AR9 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", please explain why.
4. If the answer to question 2 is "no", is there any other explanation that AR9 may have for the recent trading in its securities on 6 July 2023.
5. In light of the movement of the share price on 6 July 2023, does AR9 consider the information contained in the Press Release to be information that a reasonable person would expect to have a material effect on the price of value of its securities.
6. If the answer to this question 5 "no" please advise the basis for that view.
7. Please confirm that AR9 is complying with the Listing Rules and, in particular, Listing Rule 3.1.
8. Please confirm that AR9'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 AR9 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 **1.00 PM AWST Thursday, 6 July 2023**. 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, AR9'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 and may require AR9 to request a trading halt immediately.

Your response should be sent to me by e-mail at **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.

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 AR9’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 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 AR9’s securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

In responding to this letter, you should have regard to AR9’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 AR9’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.

Release of correspondence between ASX and entity

ASX reserves the right to release all or any part of this letter, your reply and any other related correspondence between us to the market under Listing Rule 18.7A.

Questions

If you have any questions in relation to the above, please do not hesitate to contact me.

Yours sincerely

Laura Gomme
Senior Adviser, Listings Compliance