

25 October 2017

Elizabeth Harris  
Principal Adviser, Listings Compliance (Perth)  
Australian Securities Exchange  
Level 40, Central Park  
152 St Georges Terrace  
PERTH WA 6000

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

## **DIGITALX PRICE QUERY**

Dear Elizabeth,

We refer to your letter dated 25 October 2017 querying the change in trading price of DCC shares from \$0.063 on Friday 20 October 2017 to an intra-day price of \$0.099, today 25 October 2017.

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

1. 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.
2. Not applicable.
3. The Company is continuing to execute on its stated objective of providing ICO advisory services, blockchain based consulting and blockchain-related software development.

The Company also notes that there has been a significant amount of media attention around ICOs in recent times, together with an increase in the values of certain cryptocurrencies, in particular Bitcoin which DigitalX maintains a significant holding in.

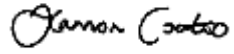
As part of its service offering, DigitalX provides corporate advice to projects conducting or looking to conduct fund raising activities through ICOs. To this end, the Company has been engaged by SingularityNET and has taken their team and an example of their expertise, the world's most expressive humanoid robot, 'Sophia', on a roadshow through Perth, Sydney and Melbourne. The roadshow attracted significant media attention on television, print and digital throughout Australia and a number of major cryptocurrency investors and venture capital firms attended the events. This is in addition to the Company's role in promoting the recent ICO of Power Ledger, which also attracted significant media attention.

The Company considers that it is reasonable to believe that ongoing work promoting its business and the companies that it is working with is introducing it to new investors who may not otherwise have been aware of the Company or its business.

4. The Company confirms it is in compliance with the Listing Rules, in particular Listing Rule 3.1.
5. I confirm that the Entity's responses to the questions above have been authorised and approved by its Board.

Please do not hesitate to contact me if further information is required.

Yours sincerely

A handwritten signature in black ink that reads "Shannon Coates". The signature is written in a cursive, flowing style.

Shannon Coates  
Company Secretary



25 October 2017

Ms Shannon Coates  
Company secretary  
DigitalX Limited  
Suite 5, 62 Ord Street  
West Perth WA 6005

*By Email: shannon@evolutioncapital.com.au*

Dear Ms Coates

**DigitalX Limited (“DCC”): Price Query**

We note a change in the price of DCC’s securities from a closing price of \$0.063 on Friday 20 October 2017 to an intra-day price today of \$0.099.

We also note an increase in the trading volume of DCC’s securities today to a level that is significantly above the average trading volume on days when DCC’s securities are traded.

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

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

Please note that the recent trading in DCC’s securities would suggest to ASX that such information may have ceased to be confidential and therefore DCC 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 DCC may have for the recent trading in its securities?
4. Please confirm that DCC is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.

5. Please confirm that DCC'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 DCC 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 **4:00 pm AWST** today **Wednesday 25 October 2017**. If we do not have your response by then, ASX will have no choice but to consider suspending trading in DCC'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, DCC'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 at [Elizabeth.Harris@ASX.com.au](mailto:Elizabeth.Harris@ASX.com.au) copying in [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 DCC'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 DCC'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 DCC'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*.

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

Yours sincerely

*[Sent electronically without signature]*

Elizabeth Harris

**Principal Adviser, Listings Compliance (Perth)**