

13 July 2017

Ben Secrett  
Senior Advisor, ASX Listings Compliance (Perth)  
Australian Securities Exchange  
Level 40, Central Park  
152-158 St Georges Terrace  
PERTH WA 6000

Dear Mr Secrett,

**Re: 8I Holdings Limited (8IH) – ASX Price and Volume Query**

In response to your letter of 12 July 2017 regarding the Company's share price and trading volume, the Company's response is as follows:

1. *Is 8IH 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?*

*In responding to this question, please consider in particular whether is aware of any information that its earnings for the 6 month period ending on 30 September 2017:*

- a) *are likely to differ materially (downwards or upwards) from any earnings guidance it has given for the period; or*

Not applicable. The Company has not given any earnings guidance for the period.

- b) *if 8IH has not given any earnings guidance for the period, are otherwise likely to come as a surprise to the market (by reference to analyst forecasts for the period or, if 8IH is not covered by analysts, its earnings for the prior corresponding period)?*

No, the Company is not aware of any information concerning it that has not been announced which, if known by some in the market, could be an explanation for the recent trading in the Company's securities.

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

- a) *Is 8IH relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1?*

*Please note that the recent trading in 8IH's securities would suggest to ASX that such information may have ceased to be confidential and therefore 8IH 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.*

Not applicable.

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).*

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 8IH may have for the recent trading in its securities?*

The Company notes that it is required to announce its net tangible asset backing (“NTA”) within 14 days after the end of each month. The Company has earlier today released its NTA announcement for the month of June 2017. It has been noted that the Company’s NTA as at the end of June 2017 has reduced by 4.6% as compared to the previous month (“Reduction”). However, the Company does not consider this Reduction material enough to affect the price of the Company’s security.

4. *Please confirm that 8IH is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.*

The Company confirms it is in compliance with the ASX Listing Rules, in particular, Listing Rule 3.1.

5. *Please confirm that 8IH’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 8IH with delegated authority from the board to respond to ASX on disclosure matters.*

The Company confirms that its responses to the questions above have been authorised and approved in accordance with its published continuous disclosure policy and approved by the Board.

Yours faithfully,



Louis Chua

**Company Secretary**

For personal use only



12 July 2017

Mr Zane Lewis  
SmallCap Corporate Pty Ltd  
Suite 6, 295 Rokeby Road  
SUBIACO WA 6008

By email

Dear Mr Lewis

**8I HOLDINGS LIMITED ("8IH"): ASX PRICE AND VOLUME QUERY**

We note the change in the price of 8IH's securities from an opening price of \$0.46 on Friday, 7 July 2017 to a closing price of \$0.315 today, Wednesday, 12 July 2017.

We also note a significant increase in the volume of 8IH's securities traded during this period to a level well in excess of the average trading volume on days when 8IH's securities are traded.

In light of this, ASX asks 8IH to answer separately each of the following questions and provide the following confirmations in a format suitable for release to the market in accordance with Listing Rule 18.7A:

1. Is 8IH 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?

In responding to this question, please consider in particular whether is aware of any information that its earnings for the 6 month period ending on 30 September 2017:

- a) are likely to differ materially (downwards or upwards) from any earnings guidance it has given for the period; or
- b) if 8IH has not given any earnings guidance for the period, are otherwise likely to come as a surprise to the market (by reference to analyst forecasts for the period or, if 8IH is not covered by analysts, its earnings for the prior corresponding period)?

2. If the answer to question 1 is "yes":

- a) Is 8IH relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1?

Please note that the recent trading in 8IH's securities would suggest to ASX that such information may have ceased to be confidential and therefore 8IH 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 8IH may have for the recent trading in its securities?
4. Please confirm that 8IH is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that 8IH’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 8IH 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 half an hour before the start of trading (ie before 7.30 am AWST) on Thursday, 13 July 2017**. If we do not have your response by then, ASX will have no choice but to consider suspending trading in 8IH’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, 8IH’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 [tradinghaltspert@asx.com.au](mailto:tradinghaltspert@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 8IH’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 8IH’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 8IH’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]*

Ben Secrett  
**Senior Adviser, ASX Listings Compliance (Perth)**