

16 February 2021

Mr. Ivan Tatkovich Adviser, Listings Compliance (Sydney) ASX 20 Bridge Street Sydney NSW 2000

Via email

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Dear Ivan

GENERAL – AWARE QUERY

We refer to your letter dated 16 February 2021 referring to Identitii's The change in the price of ID8's securities from yesterday's close of \$0.135 to an intraday high of \$0.19 today and the significant increase in the volume of Identitii's securities traded today and respond to each of your questions as follows:

1. Is ID8 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 ID8 is aware of any information that its earnings for the 6 month period ending on 31 December 2020:

- (a) are likely to differ materially (downwards or upwards) from any earnings guidance it has given for the period; or
- (b) if ID8 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 ID8 is not covered by analysts, its earnings for the prior corresponding period)?

Identitii is not aware of any information that is not in the market that could explain the recent trading in securities and is not aware of any information with regards to its half year report (six months earnings for the period ended 31 December 2020) that would come as a surprise to the market.

- 2. If the answer to question 1 is "yes".
 - (a) Is ID8 relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in ID8's securities would suggest to ASX that such information may have ceased to be confidential and therefore ID8 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?

Not applicable

3. If the answer to question 1 is "no", is there any other explanation that ID8 may have for the recent trading in its securities?

Identitii is not aware of any explanation for the recent trading in its securities other than its recent announcements in relation to its Master Services Agreement with Mastercard enabling the two customer engagements with:

- Mastercard which will use Identitii's Overlay+ platform to enable the secure sharing of information over the Mastercard account-to-account network, to help streamline financial crime compliance in cross-border payments; and
- ii. HomeSend, a global cross-border payments network that enables financial institutions to transfer money internationally, to support the delivery of financial crime compliance information.

The Master Services Agreement and two customer engagements under that Agreement continue to validate Identiti's Overlay+ platform as a tool to support enterprise banking to deal with AML issues.

Identitii was also recently been granted patent approval in the United States. This approval covers Identitii's global ecosystem for secure sharing of financial transaction information, further increasing Identitii's competitive advantage and defensibility in this space and potentially generates new revenue streams for the Company.

4. Please confirm that ID8 is complying with the Listing Rules and, in particular, Listing Rule 3.1.

Identitii confirms that it is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.

 Please confirm that ID8'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 ID8 with delegated authority from the board to respond to ASX on disclosure matters.

Identitii confirms that the responses provided in this letter have been authorised and approved by the Board.

Yours sincerely

IDENTITII LIMITED

Elissa Hansen Company Secretary



16 February 2021

Reference: 30942

Ms Elissa Hansen Company Secretary Identitii Limited

By email:

Dear Ms Hansen

Identitii Limited ('ID8'): Price - Query

ASX refers to the following:

- A. The change in the price of ID8's securities from yesterday's close of \$0.135 to an intraday high of \$0.19 today.
- B. The significant increase in the volume of ID8's securities traded today.

Request for information

In light of this, ASX asks ID8 to respond separately to each of the following questions and requests for information:

1. Is ID8 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 ID8 is aware of any information that its earnings for the 6 month period ending on 31 December 2020:

- (a) are likely to differ materially (downwards or upwards) from any earnings guidance it has given for the period; or
- (b) if ID8 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 ID8 is not covered by analysts, its earnings for the prior corresponding period)?]
- 2. If the answer to question 1 is "yes".
 - (a) Is ID8 relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in ID8's securities would suggest to ASX that such information may have ceased to be confidential and therefore ID8 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 ID8 may have for the recent trading in its securities?

- 4. Please confirm that ID8 is complying with the Listing Rules and, in particular, Listing Rule 3.1.
- 5. Please confirm that ID8'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 ID8 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 **3:30 PM AEDT Tuesday**, **16 February 2021**. 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, ID8'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 ID8 to request a trading halt immediately.

Your response should be sent to me by e-mail. 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 ID8'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 ID8's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

In responding to this letter, you should have regard to ID8'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 ID8'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

We reserve the right to release a copy 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.

Regards

Ivan Tatkovich

Adviser, Listings Compliance (Sydney)