

7 May 2018

Mr Nick Harrison
Listings Compliance (Perth)
ASX Compliance Pty Ltd
Level 40, Central Park
152-158 St Georges Terrace
Perth WA 6000

By email: tradinghaltspert@asx.com.au

Dear Nick

Response to ASX Aware Letter

I refer to the letter from ASX to Intiger Group Limited (**IAM** or **Intiger**) dated 4 May 2018 (**Aware Letter**).

Capitalised terms used in this letter have the meaning given in the Aware Letter, unless expressly defined otherwise.

On behalf of Intiger, I respond to the Aware Letter as follows:

- 1. Does the Entity consider the Information or any part thereof to be information that a reasonable person would expect to have a material effect on the price or value of its securities?**

No.

- 2. If the answer to question 1 is "no", please advise the basis for that view.**

Each of the Information relates to the process and activities undertaken as part of the CBA Pilot Programs. The CBA Pilot Programs remain continuing and not are completed.

- 3. When did the Entity first become aware of the Information or any part thereof?**

The Information (other in respect of the closure of the India operation) relates to various activities conducted as part of the CBA Pilot Programs. Intiger was aware of the commencement of production of statements of advice for the CBA Pilot Programs in early March 2018 as that was an on-going part of pilot program; and the site visit by the CBA senior management and third party site inspectors to the Entity's Manila Operating Centre occurring on or about 10 April 2018; the Entity commenced discussions and agreed to a training and upskilling program on or about 10 April 2018 as part of the ongoing process associated with the CBA Pilot Program. The Entity finalised the closure of the Indian operations on or about 31 January 2018 and transferred its processing to Cebu and Manila Operating Centres thereafter. The Indian operations were not significant or material to the Entity's operations.

4. **If the answer to question 1 is “yes” and the Entity first became aware of the Information before the relevant date, did the Entity make any announcement prior to the relevant date which disclosed the Information? If so, please provide details. If not, please explain why this Information was not released to the market at an earlier time, commenting specifically on when you believe the Entity was obliged to release the Information under Listing Rules 3.1 and 3.1A and what steps the Entity took to ensure that the Information was released promptly and without delay.**

The Information was disclosed as part of a general market update. Intiger does not believe that the Information is information that a reasonable person would expect to have a material effect on the price or value of its securities and on that basis, Intiger does not believe that it is obliged to release the Information under Listing Rules 3.1 and 3.1A.

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

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

6. **Please confirm that the Entity’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 the Entity with delegated authority from the board to respond to ASX on disclosure matters.**

Yes, Intiger confirms that its responses to the questions above has been authorised and approved in accordance with its continuous disclosure policy or otherwise by its board or an officer of Intiger with delegated authority form the board to respond to ASX on disclosure matters.

I trust this letter addresses the Aware Letter to the satisfaction of ASX. Please contact me if you have any further queries.

Yours sincerely



Stephen Buckley
Company Secretary



4 May 2018

Mr Stephen Buckley
Company Secretary
Intiger Group Limited
Barringtons House
283 Rokeby Road
Subiaco WA 6008

By email: stephen@companysecsol.com.au

Dear Mr Buckley

Intiger Group Limited (the “Entity”): aware query

ASX Limited (“ASX”) refers to the following:

- A. The Entity’s announcement entitled “Intiger Enters Into 3 Pilot Agreements” lodged on the ASX Market Announcements Platform and released at 1:32 pm AEST on 2 February 2018, disclosing information including that the Entity has, through its wholly owned subsidiary Intiger Asset Management Pty Ltd, entered into agreements with Commonwealth Financial Planning Limited, Financial Wisdom Limited and Count Financial Limited (collectively, “CBA”) under which CBA are to conduct pilot programs trialling the provision of the Entity’s services (“CBA Pilot Programs”).
- B. The Entity’s announcement entitled “Intiger Market Update” lodged on the ASX Market Announcements Platform and released at 09:47 am AEST on 4 May 2018, disclosing information including the following:
- a) that production of statements of advice for the CBA Pilot Programs commenced in early March;
 - b) that the Entity hosted a team of CBA senior management and third party site inspectors to its Manila Operating Centre during early April;
 - c) that CBA and the Entity have agreed to a training and upskilling program to commence imminently; and
 - d) that the Entity has completed closure of its India operation as processing is transferred to the Cebu and Manila Operating Centres;
- (together, “the Information”).
- C. Listing Rule 3.1, which 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.
- D. The definition of “aware” in Chapter 19 of the Listing Rules, which states that:

“an entity becomes aware of information if, and as soon as, an officer of the entity (or, in the case of a trust, an officer of the responsible entity) has, or ought reasonably to have, come into possession of the information in the course of the performance of their duties as an officer of that entity”

and section 4.4 in Guidance Note 8 *Continuous Disclosure: Listing Rules 3.1 – 3.1B* “When does an entity become aware of information”.

- E. Listing Rule 3.1A, which sets out exceptions from the requirement to make immediate disclosure, provided that each of the following are satisfied.

“3.1A Listing rule 3.1 does not apply to particular information while each of the following is satisfied in relation to the information:

3.1A.1 One or more of the following applies:

- *It would be a breach of a law to disclose the information;*
- *The information concerns an incomplete proposal or negotiation;*
- *The information comprises matters of supposition or is insufficiently definite to warrant disclosure;*
- *The information is generated for the internal management purposes of the entity; or*
- *The information is a trade secret; and*

3.1A.2 *The information is confidential and ASX has not formed the view that the information has ceased to be confidential; and*

3.1A.3 *A reasonable person would not expect the information to be disclosed."*

- F. ASX's policy position on the concept of "confidentiality", which is detailed in section 5.8 of Guidance Note 8 *Continuous Disclosure: Listing Rules 3.1 – 3.1B*. In particular, the Guidance Note states that:

"Whether information has the quality of being confidential is a question of fact, not one of the intention or desire of the listed entity. Accordingly, even though an entity may consider information to be confidential and its disclosure to be a breach of confidence, if it is in fact disclosed by those who know it, then it ceases to be confidential information for the purposes of this rule."

Having regard to the above, ASX asks the Entity to respond separately to each of the following questions and requests for information:

1. Does the Entity consider the Information or any part thereof to be information that a reasonable person would expect to have a material effect on the price or value of its securities?
2. If the answer to question 1 is "no", please advise the basis for that view.
3. When did the Entity first become aware of the Information or any part thereof?
4. If the answer to question 1 is "yes" and the Entity first became aware of the Information before the relevant date, did the Entity make any announcement prior to the relevant date which disclosed the Information? If so, please provide details. If not, please explain why this Information was not released to the market at an earlier time, commenting specifically on when you believe the Entity was obliged to release the Information under Listing Rules 3.1 and 3.1A and what steps the Entity took to ensure that the Information was released promptly and without delay.
5. Please confirm that the Entity is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.
6. Please confirm that the Entity'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 the Entity 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 9.30 a.m. AEST) on Wednesday, 9 May 2018.

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, the Entity'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 the Entity to request a trading halt immediately.

If you wish to request 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*.

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. 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

In responding to this letter, you should have regard to the Entity'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 the Entity'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.

Suspension

If you are unable to respond to this letter by the time specified above ASX will likely suspend trading in the Entity's securities under Listing Rule 17.3.

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

Yours sincerely

[Sent electronically without signature]

Nick Harrison

Listings Compliance (Perth)

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