

25 May 2018

Ms Shannon Nicholson
Principal Adviser, Listings Compliance (Perth)
ASX Compliance Pty Ltd
Level 40, Central Park
152-158 St Georges Terrace
Perth WA 6000

By email: tradinghaltsperth@asx.com.au

Dear Shannon

Response to ASX Aware Letter

I refer to the letter from ASX to Intiger Group Limited (**IAM** or **Intiger**) dated 22 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 Company consider the information contained in the October Update Announcement and the February Update Announcement, in particular, the information regarding the pilot programs that are in addition to the pilot programs conducted with the Commonwealth Bank of Australia (the "Additional Pilot Programs"), to be information that a reasonable person would expect to have a material effect on the price or value of its securities?**

The Company does not believe the statements in relation to the future pilot programs as referenced in the October Update Announcement to be information that a reasonable person would expect to have a material effect on the price or value of its securities ("October Update Announcement Information").

The Company believed that the agreements pertaining to the Letter of Intent with Commonwealth Financial Planning Ltd and the separate Deeds of Agreement with Financial Wisdom Limited and Count Financial Ltd which were disclosed in the February Update Announcement are 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.**

The October Update Announcement Information pilot programs were early and short term trial pilot programs to allow potential customers to assess the Company's services. There was no ongoing obligation on the customers to continue to use the Company's services after the end of the trial period and either party could terminate these agreements at will. The value of the services provided under these pilot programs was expected to be low (revenue generated to date under the Additional Pilot Programs is \$46,164).

On this basis, the Company considers that the October Update Announcement Information would not be likely to influence persons who commonly invest in securities in deciding whether to acquire or disclose of the Company's securities and therefore did not meet the test set out in section 677 of the *Corporations Act 2001* (Cth) for determining whether information is market sensitive and therefore needs to be disclosed under Listing Rule 3.1.

3. When did the Company first commence the Additional Pilot Programs?

Intiger commenced providing services under the Additional Pilot Programs on 9 October 2017.

4. If the answer to question 1 is "yes" and the Company first commenced the Additional Pilot Programs before the relevant date, did the Company make any announcement prior to the relevant date which disclosed the Additional Pilot Programs? 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 Company was obliged to release this information under Listing Rules 3.1 and 3.1A and what steps the Company took to ensure that this information was released promptly and without delay.

Not applicable.

5. Please provide the names of the parties participating in the Additional Pilot Programs.

Floreat Pty Ltd T/A Acton North and Mindarie Pty Limited T/A/ Acton West Coast

(Collectively '**Acton**')

Cyberside Investments Pty Ltd T/A Artisan Financial Services ('**Artisan**')

KRA Financial Group Pty Ltd and President Financial Services Pty Ltd t/as KRA Wealth Management (Collectively '**KRA**')

Blueprint Planning Pty Ltd T/A Blueprint Wealth ('**Blueprint**')

6. Please provide comprehensive details of any and all agreements that the Company has entered into with respect to the Additional Pilot Programs.

Property Management Service Agreement dated 4 October 2017 between the Company and Floreat Pty Ltd T/A Acton North and Mindarie Pty Limited T/A Acton West Coast.

Service Level Agreement dated 18 October 2017 between the Company and Cyberside Investments Pty Ltd T/A Artisan Financial Services.

Confidentiality Agreement dated 18 October 2017 between the Company and Cyberside Investments Pty Ltd T/A Artisan Financial Services.

Service Level Agreement dated 13 October 2017 between the Company and KRA Financial Group Pty Ltd.

Service Level Agreement dated 6 October 2017 between the Company and Blueprint Planning Pty Ltd T/A Blueprint Wealth.

The table below summaries the content of these agreements:

Party	Acton	Artisan	KRA	Blueprint
Term of Agreement	Minimum 6 months	None specified	None specified	None specified
Ability to Terminate	One month's notice from either party	Immediate from either party	Immediate from either party	Immediate from either party
Services provided	Property Management administration tasks	Financial Planning administration and processing solutions	Financial Planning administration and processing solutions	Financial Planning administration and processing solutions
Are fees payable for services?	Yes	Yes	Yes	Yes
How are fees paid?	Bi-monthly Invoices	Bi-Monthly invoices	Monthly Invoice	Bi-Monthly invoices
What if any conditions required to be fulfilled to proceed to long term contract?	None	None	None	None

7. Please provide details of any revenue generated to date from the Additional Pilot Programs.

The total revenue generated to date from the Additional Pilot Programs is \$46,164.

8. Please provide details of the status of the Additional Pilot Programs, including whether the Company is in a position to negotiate longer term service level agreements, based on the Additional Pilot Programs.

Of the four parties which participated in the Additional Pilot Programs:

- three of the parties, Acton, Artisan and Blueprint continue to use Intiger's services on an ongoing basis under the terms of the relevant service agreement entered into at the beginning of the relevant pilot program. The Company is not yet in a position to negotiate longer term service contracts with these firms; and
- one party, KRA, agreed to pilot with Intiger but did not actually commence usage of Intiger's services and has not used Intiger's services after the end of the pilot program period.

9. Please confirm that the Company 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.

10. Please confirm that the Company'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 Company 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 from 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



22 May 2018

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

By email: stephen@companysecsol.com.au

Dear Mr Buckley

Intiger Group Limited (the “Company”): ASX Query Letter

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

- A. The Company’s announcement entitled “Intiger Market Update” lodged on the ASX Market Announcements Platform and released on 27 October 2017 (“October Update Announcement”), which includes the following statements.

The Company is rolling out further pilot programs in November 2017 which if successful, would set the basis for the Company to negotiate longer term service level agreements.

Running for between 3 and 6 weeks, the pilots will enable the customers to assess the integrity and value of Intiger’s services and BOOM2 in both its wholly owned financial advice business and through its licensee network in a range of different sized financial planning practices.

The pilot programs are being delivered on a non-binding service level arrangement and as there is no guaranteed level of service being acquired, future revenue is dependant upon a number of factors and cannot therefore be estimated.

- B. The Company’s announcement entitled “Intiger Enters Into 3 Pilot Agreements” lodged on the ASX Market Announcements Platform and released on 2 February 2018, which includes the following statements.

The Company has, through its wholly owned subsidiary Intiger Asset Management Pty Ltd (“Intiger”), entered into a Letter of Intent (“LOI”) with Commonwealth Financial Planning Limited, and separate Deeds of Agreement (“DOA”) with Financial Wisdom Limited and Count Financial Limited.

These agreements pertain to each of these companies conducting a pilot program trialling the provision of Intiger’s services.

Subsequent agreements may be entered between the parties as the pilot program develops and the parties agree to progress.

- C. The Company’s announcement entitled “Intiger Market Update” lodged on the ASX Market Announcements Platform and released on 7 February 2018 (“February Update Announcement”), which includes the following statements.

The Company has worked closely with the Commonwealth Bank of Australia to agree and prepare for the pilot programs which were announced on February 2, 2018, which will commence in Q1 2018 and may be completed at any time within a 12-month period.

As advised in the Q3 Activity Update dated 27 October 2017, the Company continued to engage in Pilot Programs (in addition to those referred to above and announced on February 2 2018) which commenced in December 2017. If successful, these could set the basis for the Company to negotiate longer term service agreements.

- D. ASX's policy position on the concept of "the contents of announcements under Listing Rule 3.1" which is detailed in section 4.15 of Guidance Note 8 Continuous Disclosure: Listing Rules 3.1 – 3.1B "Guidelines on the contents of announcements under Listing Rule 3.1". In particular, the Guidance Note states as follows:

Wherever possible, an announcement under Listing Rule 3.1 should contain sufficient detail for investors or their professional advisers to understand its ramifications and to assess its impact on the price or value of the entity's securities.

An announcement under Listing Rule 3.1 must be accurate, complete and not misleading.

- E. ASX's policy position on "Disclosure contrary to the short term interests of the entity" which is detailed in section 4.21 of Guidance Note 8 Continuous Disclosure: Listing Rules 3.1 – 3.1B "Disclosure must be made even if it is contrary to the short term interests of the entity". In particular, the Guidance Note states as follows:

An entity must comply with its disclosure obligations under Listing Rule 3.1 and section 674, even if it does not appear to be in its short term interests to do so (eg, because the information might have a materially negative impact on the price of its securities and perhaps jeopardise a transaction that it is trying to conclude).

- F. The Listed@ASX Compliance Update dated 25 July 2016, which reminded listed entities of the guidance in section 4.15 of Guidance Note 8 in relation to an entity's continuous disclosure obligations under Listing Rule 3.1, which includes the announcement of the identity of a party to a material transaction with a listed entity. In particular, the Compliance Update states as follows:

ASX considers that if a transaction is sufficiently material to warrant disclosure under Listing Rule 3.1, the identity of the other party or parties will generally itself be material information that must also be disclosed under that rule. Such information is required by investors and their professional advisers to understand the ramifications of the transaction and to assess its impact on the price or value of the entity's securities.

- G. Listing rule 18.7, which states as follows.

An entity must give ASX any information, document or explanation that ASX asks for to enable it to be satisfied that the entity is, and has been, complying with the Listing Rules. The entity must do so within the time specified by ASX. ASX may submit, or require the entity to submit, any information given to ASX to the scrutiny of an expert selected by ASX. The entity must pay for the expert.

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

1. Does the Company consider the information contained in the October Update Announcement and the February Update Announcement, in particular, the information regarding the pilot programs that are in addition to the pilot programs conducted with the Commonwealth Bank of Australia (the "Additional Pilot Programs"), 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 Company first commence the Additional Pilot Programs?

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4. If the answer to question 1 is “yes” and the Company first commenced the Additional Pilot Programs before the relevant date, did the Company make any announcement prior to the relevant date which disclosed the Additional Pilot Programs? 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 Company was obliged to release this information under Listing Rules 3.1 and 3.1A and what steps the Company took to ensure that this information was released promptly and without delay.
 5. Please provide the names of the parties participating in the Additional Pilot Programs.
 6. Please provide comprehensive details of any and all agreements that the Company has entered into with respect to the Additional Pilot Programs.
 7. Please provide details of any revenue generated to date from the Additional Pilot Programs.
 8. Please provide details of the status of the Additional Pilot Programs, including whether the Company is in a position to negotiate longer term service level agreements, based on the Additional Pilot Programs.
 9. Please confirm that the Company is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.
 10. Please confirm that the Company’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 Company 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 4.00pm AWST) on Friday, 25 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 Company’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 Company 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 Company'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 Company'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 Company'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]

Shannon Nicholson

Principal Adviser, Listings Compliance (Perth)

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E Shannon.Nicholson@asx.com.au