



17 February 2020

Ms Isabelle Andrews
Senior Adviser, Listings Compliance (Perth)
ASX Compliance Pty Ltd
Level 40, Central Park
152-158 St Georges Terrace
PERTH WA 6000

By Email: isabelle.andrews@asx.com.au

Dear Ms Andrews,

AssetOwl Limited ('AO1'): Appendix 4C Query

We refer to your letter to AssetOwl Limited ('the Company') dated 11 February 2020 in relation to Company's Appendix 4C Cashflow Report for the period ended 31 December 2019 (lodged with ASX and released on 31 January 2020) and respond as follows:

1. Does AO1 expect that it will continue to have negative operating cash flows for the time being and, if not, why not?

Yes. For the quarter to 31 December 2019, AO1 had negative operating cash flows as reported in the Company's Appendix 4C announced on 31 January 2020.

The Company's recent activities focussed on the continued development of its Property Management Platform, Inspector360, for which it has incurred material cost.

The Company has recently completed a commercial trial with RE/MAX WA, and RE/MAX WA has confirmed its intention to implement Inspector360 under contract and refer it to other Australian RE/MAX franchisees. Further, Inspector360 trials are scheduled to commence later this month with Colliers International WA, The Agency, Attree Real Estate and others.

Whilst the Company expects to generate cash receipts from the implementation of Inspector360 by RE/MAX WA during the quarter to 31 March 2020, having regard to the Company's cost base and anticipated gradual roll out of Inspector360 in the market place, AssetOwl expects that it will continue to have negative operating cash flows for the time being.

2. Has AO1 taken any steps, or does it propose to take any steps, to raise further cash to fund its operations and, if so, what are those steps and how likely does it believe that they will be successful?

Yes. The Company is currently engaging with a financial services firm regarding an anticipated capital raising to meet the Company's working capital requirements.

The Company has no reason to believe this anticipated capital raising will not be successful, and will provide an update once the details have been settled.

3. Does AO1 expect to be able to continue its operations and to meet its business objectives and, if so, on what basis?

Yes. The Company expects to be able to continue its operations and to meet its business objectives.

The Company is meeting its business objectives and has achieved the following notable milestones in recent months:

- Reaching agreement with cornerstone customer RE/MAX WA for the implementation of Inspector360.
- The scheduling of commercial trials with Colliers International WA, The Agency, Attree Real Estate and others, anticipated to commence this month.
- Reaching agreement with PropertyMe, a leading trust accounting and communication platform, and one of Australia's largest and most complete cloud property management software providers. The integration work is underway and AssetOwl expects technical integration of Inspector360 with PropertyMe to be finalised this month ahead of plans to launch an integrated service offering to PropertyMe customers in March 2020.
- The filing of a provisional patent application with the Australian Patent Office for the Intellectual Property which AssetOwl has developed, being the process and technology for capturing evidence in a novel way. Filing the provisional patent application allows AssetOwl's software to be sold commercially whilst protecting the Company's Intellectual Property.

These achievements are expected to facilitate the continued commercialisation of Inspector360 and generate revenue and increasing cash-flow for the Company.

4. Please confirm that AO1 is complying with Listing Rule 3.1 and that there is no information that should be given to ASX about its financial condition under that rule that has not already been released to the market.

We confirm that AO1 is in compliance with the listing rules and, in particular, Listing Rule 3.1 concerning the Company's continuous disclosure obligations.

5. Please confirm that AO1'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 AO1 with delegated authority from the board to respond to ASX on disclosure matters.

We confirm that AO1's response in this letter has been approved by the Company's Board of Directors.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Sm', is positioned above the typed name of Sean Meakin.

Sean Meakin
Company Secretary



11 February 2020

Reference: 13815

Mr Sean Meakin
Company Secretary
AssetOwl Limited
Level 14, 225 St Georges Terrace
PERTH WA 6000

By email: smeakin@transrg.com.au

Dear Mr Meakin

AssetOwl Limited ('AO1'): Appendix 4C Query

ASX refers to AO1's Appendix 4C quarterly report for the period ended 31 December 2019 lodged with the ASX Market Announcements Platform and released on 31 January 2020 (the 'Appendix 4C').

ASX notes that AO1 has reported:

- negative net operating cash flows for the quarter of \$404,000;
- cash at the end of the quarter of \$201,000; and
- estimated cash outflows for the next quarter of \$180,000.

It is possible to conclude, based on the information in the Appendix 4C, that if AO1 were to continue to expend cash at the rate indicated by the Appendix 4C, AO1 may not have sufficient cash to continue funding its operations.

Request for Information

In view of that, ASX asks AO1 to answer separately each of the following questions and provide the following confirmations in a format suitable for release to the market under Listing Rule 18.7A:

1. Does AO1 expect that it will continue to have negative operating cash flows for the time being and, if not, why not?
2. Has AO1 taken any steps, or does it propose to take any steps, to raise further cash to fund its operations and, if so, what are those steps and how likely does it believe that they will be successful?
3. Does AO1 expect to be able to continue its operations and to meet its business objectives and, if so, on what basis?
4. Please confirm that AO1 is complying with Listing Rule 3.1 and that there is no information that should be given to ASX about its financial condition under that rule that has not already been released to the market.
5. Please confirm that AO1'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 AO1 with delegated authority from the board to respond to ASX on disclosure matters.

Please also provide any other information that AO1 considers may be relevant to ASX forming an opinion on whether AO1 is complying with Listing Rule 12.2 that a listed entity's financial condition must, in ASX's opinion, be adequate to warrant the continued quotation of its securities and its continued listing.

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 **09:00 AM AWST Monday, 17 February 2020**.

If we do not have your response by then, ASX will have no choice but to consider suspending trading in AO1'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, AO1'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 ListingsCompliancePerth@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 Rule 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 AO1'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 AO1'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, you should discuss with us whether it is appropriate to request a trading halt in AO1's securities under Listing Rule 17.1. 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*.

Enquiries

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

Yours sincerely

Isabelle Andrews
Senior Adviser, Listings Compliance (Perth)