

# FLEXIROAM

02 March 2023

Damian Dinelli  
ASX Listings Compliance – Perth  
Level 40, Central Park  
152-158 St Georges Terrace  
Perth WA 6000

By email: [damian.dinelli@asx.com.au](mailto:damian.dinelli@asx.com.au); [ListingsCompliancePerth@asx.com.au](mailto:ListingsCompliancePerth@asx.com.au)

Dear Damian,

## **FLEXIROAM LIMITED (ASX:FRX) – ASX PRICE AND VOLUME QUERY**

We refer to your letter dated 2 March 2023 in relation to a noted increase in the price and trading volume of the Company's securities and respond to your queries in the same order as raised:

1. Is FRX 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?

*No, the Company is not aware of any information not already released to the market.*

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

*Not applicable.*

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

*Other than recent ASX announcements or general media releases reporting the matters as follows:*

- *a business update webinar regarding the Company's December 2022 quarterly report and Appendix 4C; and*
- *media releases relating to new white label reseller agreements with Sky Call and Telesim;*

*the Company is not aware of any other matters which could explain the increase in price and trading volume of the Company's securities in the last few days.*

*The Company notes that the recent white label reseller agreement with Telesim was released last week and whilst the reseller deal is a great opportunity for the Company to increase data usage globally and grow its database, its potential dollar value cannot be ascertained at this stage. The media releases were considered under the Company's market communications policy and approved for release. The media releases are not considered to be individually material for the purposes of Listing Rule 3.1.*

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

*The Company confirms it is in compliance with the Listing Rules, including Listing Rule 3.1.*



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

*The above has been authorised and approved in accordance with the Company's 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.*

Yours sincerely  
Natalie Teo

**Company Secretary**



2 March 2023

Reference: 69558

Ms Natalie Teo  
Company Secretary  
Flexiroam Limited

By email

Dear Ms Teo

### **Flexiroam Limited ('FRX'): Price and Volume Query**

ASX refers to the following:

- A. The change in the price of FRX's securities from a low of \$0.038 on 24 February 2023 to an intraday high of \$0.056 today.
- B. The significant increase in the volume of FRX's securities traded from 24 February 2023 to 2 March 2023.

### **Request for information**

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

1. Is FRX 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?
2. If the answer to question 1 is "yes".
  - (a) Is FRX relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in FRX's securities would suggest to ASX that such information may have ceased to be confidential and therefore FRX 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 FRX may have for the recent trading in its securities?
4. Please confirm that FRX is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that FRX'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 FRX 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 **10:15 AM AWST Thursday, 2 March 2023**. 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

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within the exceptions mentioned in Listing Rule 3.1A, FRX'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 FRX to request a trading halt immediately.

Your response should be sent to me by e-mail at [ListingsCompliancePerth@asx.com.au](mailto: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.

### **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 FRX'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 FRX's securities under Listing Rule 17.3.

### **Listing Rules 3.1 and 3.1A**

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

Yours faithfully

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**Damian Dinelli**  
Senior Adviser, Listings Compliance