

13 December 2024

**ASX Compliance**

**Level 40, Central Park**

**152-158 St Georges Terrace**

**PERTH WA 6000**

by email: [ListingsCompliancePerth@asx.com.au](mailto:ListingsCompliancePerth@asx.com.au)

**Adisyn Ltd**

Adisyn Ltd (**ASX: AI1 (Company)**) refers to your price and volume query letter dated 12 December 2024 (**Query Letter**) and provides the following responses.

**1. Is AI1 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?**

The Company has previously announced its intended divestment of the Company's Miner Hosting Business (see announcements dated 24 April 2024, 31 July 2024 and 30 September 2024). This intended divestment has also been represented in the Company's audited accounts.

As a result of the receipt of the Query Letter, the Company has made the announcement released today (13 December 2024) to update shareholders regarding the Company's proposed divestment of the Miner Hosting Business (**Proposed Divestment**).

Noting the small scale of the Proposed Divestment, the Company does not consider that the Company's current negotiation of the Proposed Divestment would:

- (a) be the reason for the recent trading in the Company's securities; or
- (b) have a material effect on price or value of the Company's securities. The Company notes that the Proposed Divestment referred to in the announcement remains subject to negotiation by the parties and the execution of a formal legally binding agreement.

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

**(a) Is AI1 relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in AI1's securities would suggest to ASX that such information may have ceased to be confidential and therefore AI1 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.**

Not applicable.

**(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).**

As noted above, in conjunction with this response, the Company has provided an announcement released today (13 December 2024) regarding the Proposed Divestment.

**(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 AI1 may have for the recent trading in its securities?**

See the Company's response to question 1 above.

4. Please confirm that AI1 is complying with the Listing Rules and, in particular, Listing Rule 3.1.

Confirmed.

5. Please confirm that AI1'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 AI1 with delegated authority from the board to respond to ASX on disclosure matters.

Confirmed.

Your Sincerely,

Ms Kyla Garic  
Company Secretary  
Adisyn Ltd



12 December 2024

Reference: ODIN104470

Ms Kyla Garic  
Company Secretary  
Adisyn Limited  
Suite 7 63 Shepperton Road  
Victoria Park WA AU 6100

By email: [kyla.garic@onyxcorporate.com](mailto:kyla.garic@onyxcorporate.com)

Dear Ms Garic

### **Adisyn Limited ('AI1'): Price and Volume - Query**

ASX refers to the following:

- A. The change in the price of AI1's securities from a low of \$0.065 on 10 December to a high of \$0.089 today.
- B. The significant increase in the volume of AI1's securities traded from 10 December 2024 to 12 December 2024.

### **Request for information**

In light of this, ASX asks AI1 to respond separately to each of the following questions and requests for information:

1. Is AI1 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 AI1 relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in AI1's securities would suggest to ASX that such information may have ceased to be confidential and therefore AI1 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 AI1 may have for the recent trading in its securities?
4. Please confirm that AI1 is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that AI1'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 AI1 with delegated authority from the board to respond to ASX on disclosure matters.

### **When and where to send your response**

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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 AWST Thursday, 12 December 2024**. 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, AI1'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 AI1 to request a trading halt immediately.

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.

### **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 AI1'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 AI1's securities under Listing Rule 17.3.

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

In responding to this letter, you should have regard to AI1'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 AI1'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**

ASX reserves the right to release all or any part of this letter, your reply and any other related correspondence between us to the market under Listing Rule 18.7A.

Yours sincerely

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ASX Compliance

For personal use only

