

27 March 2020

Melissa Kostopoulos
Australian Securities Exchange
Compliance Adviser, Listings Compliance (Melbourne)

Dear Melissa

Response to ASX query

Lifespot Health Limited (LSH or Company) refers to your letter dated 26 March 2020 and responds as follows:

1. Is LSH 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.

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 LSH may have for the recent trading in its securities?

The Company released an announcement to ASX at 9am on 25 March 2020 (titled "*BODYTEL™ PLATFORM TO BE EXTENDED TO FEVER TRACKING*") which outlined the Company's steps to extend the BodyTel digital health monitoring platform to incorporate Bluetooth enabled thermometers to support fever monitoring by individuals and organisations in response to the unmet need arising from the COVID-19 pandemic.

The change in the Company's share price and increase in trading volumes occurred after the release of this announcement. The Company considers that the market's response to this announcement explains the recent trading in its securities.

4. In relation to the Announcement please provide:

(a) Details of the 'Australian and International resources to further develop and complete the BodyTel™ APP and platform extension to incorporate temperature monitoring via the Bodytel platform and a branded Bluetooth thermometer' said to have been deployed and when it is expected to be completed, as referred to in Statement 1.



In 2017 and 2018 the Company's BodyTel™ ISO 13485 accredited platform and APP's were developed and deployed with connected bluetooth devices to assist patients and their healthcare professionals in the management of chronic metabolic syndrome diseases such as cardiovascular disease and diabetes. These diseases require ongoing tracking of blood pressure, pulse, international normalise ratio (INR), blood sugar and body weight, amongst other parameters.

The Company made a substantial investment in the development of the BodyTel™ platform, however due to competitive pressure and the changing environment in the healthcare system, the revenue expected from utilising the BodyTel™ platform in the management of metabolic syndrome disease has not yet been realised.

The Company did not previously consider body temperature, or tracking of a patient fever, as an important measure for metabolic syndrome diseases and therefore did not develop a Bluetooth connected device for temperature tracking in the suite of its current devices.

However, with the rapid rise of COVID-19 the Company has received enquiries from a Pharmacy distributor and a Pharmacist enquiring as to the availability of body temperature devices with Bluetooth connectivity.

In addition, the Australian Government recently announced as part of its COVID-19 measures the expansion of MBS Telehealth items with a focus on the need for remote monitoring. The Company believes the BodyTel™ platform and its connected Bluetooth device can greatly assist Healthcare practitioners by enabling remote diagnostic data to the Telehealth practitioner.

The Company reviewed the overall market opportunity and decided to focus efforts on adding a range of body temperature devices to the BodyTel™ platform with the intention of having the first devices in market by winter 2020 in Australia.

The Company has therefore engaged with a TGA regulatory consultant to advise on the TGA regulatory approval processes for the products in development and has engaged with software developers in Australia in order to prepare the Bodytel APP and platform to integrate body temperature thermometers.

The Company has also re-engaged the BodyTel™ platform software architect in Germany to provide the Australian software developers with on-boarding to facilitate the local development and enhancement of the technology platform, and to connect the Company to several body temperature thermometer manufacturers in China and Europe to source an existing range of Bluetooth devices branded with the Company's chosen brand name.

The Company has also engaged with its legal advisors in relation to intellectual property rights protection for its intended product branding.

The Company has made strong progress in sourcing and plans to source suitable devices that are existing on the market and adapt the software platform locally. The Company's goal is to have the first product in market in June 2020.

(b) Evidence of 'negotiation with a pharmacy channel distributor in Australia' (not for release to the market) and how advanced LSH is with the negotiation as referred to in Statement 2

Evidence and summary of negotiation provided to ASX (not for release to market).

The Company has had ongoing negotiations over the past week with a pharmacy distributor organisation. The Company and the pharmacy distributor are currently negotiating over the cost of servicing pharmacies



and the costs of maintaining inventory and shipping for a potential ongoing distribution arrangement for the Company's products throughout Australia.

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

The Company is currently in compliance with the Listing Rules, and in particular, Listing 3.1.

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

Confirmed. This response has been authorised accordingly.

Mr Justyn Stedwell

Company Secretary

On behalf of the Board of Directors

Lifespot Health Limited

Go to www.lifespot-health.com

Follow us on Twitter - @LifespotH

About Lifespot Health Ltd.

CONNECTING HARDWARE WITH SOFTWARE – DIGITAL TECHNOLOGY FOR BETTER HEALTHCARE

Our core expertise is in connecting medical diagnostic devices and digital medicine delivery systems via Bluetooth and Smart device APPs to our cloud based ISO13485 accredited BodyTel™ patient management system. Our systems and applications are cloud and smartphone-based and easy to use.

We provide our diagnostic systems and medicine delivery platforms to healthcare enterprises for own branding white label contracts. Our German based BodyTel™ system is based on modern and future-proof internet technology utilizing advanced technologies such as document-based databases and biological neural networks.

Our German based Seng-Vital is specialized in development of hardware in the medical and non-medical Cannabis categories. In 2019 the company launched Medihale®, a digitally integrated medical cannabis vaporiser hardware and software solution that incorporates BodyTel™ App's to be the world's first fully integrated vaporising system. The Company continues to lead the way in innovative vaporiser hardware and software for OEM clients.



26 March 2020

Reference: ODIN16009

Mr Justyn Stedwell
Company Secretary
Lifespot Health Ltd
1B/205-207 Johnston Street
Fitzroy VIC 3065

By email: justyn@stedwell.com.au

Dear Mr Stedwell

Lifespot Health Ltd ('LSH'): Price Query

We note the change in the price of LSH's securities from a closing price of 1.7 cents on 23 March 2020 to a high of 6.9 cents today, prior to the pause in trading imposed at 11.53am AEDT when LSH's securities had last traded at 6.2 cents.

We also note the very significant increase in the volume of LSH's securities traded yesterday and this morning which may be attributed to the LSH announcement released on the ASX Market Announcements Platform yesterday, 25 March 2020 at 9:00am AEDT, headed '*BodyTel Platform to be Extended to Fever Tracking*' (the 'Announcement') which included the following statements:

A. Statement 1:

Following market requests for a fully integrated temperature self-tracking and monitoring system for individuals and organisations, the Company has deployed Australian and International resources to further develop and complete the BodyTel™ APP and platform extension to incorporate temperature monitoring via the Bodytel platform and a branded Bluetooth thermometer.

B. Statement 2:

The Company is currently in negotiation with a pharmacy channel distributor in Australia to begin the Australian and then Asia Pacific regional rollout.

Request for Information

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

1. Is LSH 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 LSH relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in LSH's securities would suggest to ASX that such information may have ceased to be confidential and therefore LSH 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 LSH may have for the recent trading in its securities?
4. In relation to the Announcement please provide:
- (a) Details of the ‘*Australian and International resources to further develop and complete the BodyTel™ APP and platform extension to incorporate temperature monitoring via the Bodytel platform and a branded Bluetooth thermometer*’ said to have been deployed and when it is expected to be completed, as referred to in Statement 1.
 - (b) Evidence of ‘*negotiation with a pharmacy channel distributor in Australia*’ (not for release to the market) and how advanced LSH is with the negotiation as referred to in Statement 2
5. Please confirm that LSH is complying with the Listing Rules and, in particular, Listing Rule 3.1.
6. Please confirm that LSH’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 LSH 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 **12:00 PM AEDT Friday, 27 March 2020**. If we do not have your response by then, ASX will likely suspend trading in LSH’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, LSH’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 ListingsComplianceMelbourne@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

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 LSH’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 LSH’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

LSH’s securities are presently in a trading halt which is due to end no later than the commencement of trading on Monday, 30 March 2020, being the second business day after the halt was granted.

If you are unable to respond to this letter by 9:30am AEDT, Monday 30 March 2020, ASX will likely suspend trading in LSH’s securities under Listing Rule 17.3.

Enquiries

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

Yours sincerely

Melissa Kostopoulos

Compliance Adviser, Listings Compliance (Melbourne)