

21 May 2018

Clare Porta Adviser, Listings Compliance Australian Securities Exchange 20 Bridge Street Sydney NSW 2000

By email: clare.porta@asx.com.au

Dear Clare

# COMOPS LIMITED (ASX: COM) - ASX PRICE QUERY

We refer to your letter dated 18 May 2018, received by email, requesting a response to the change in price of securities of ComOps Limited (ComOps or COM) in recent days.

ComOps responds to each of the questions contained in your letter as follows:

1. Is COM 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?

Yes

- 2. If the answer to question 1 is yes:
  - a) Is COM relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in COM's securities would suggest to ASX that such information may have ceased to be confidential and therefore COM 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.

Yes

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.

No

c) If an announcement cannot be made immediately, why not and when is it expected that an announcement will be made?

ComOps is currently in contract negotiation with a prospective customer for which it has been named as the preferred supplier following a tender process. The contract with this new customer may be material in size. These negotiations are ongoing and as such, there is no certainty of value or term or when these negotiations will be concluded. ComOps considers



any announcement at this stage may be detrimental to these negotiations. The company will make an announcement at the conclusion of these negotiations.

The company believes that the recent positive news contained in its company update to shareholders (see announcement made on 7 May 2018) may have had a positive impact on investor sentiment when valuing the shares of ComOps.

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

n/a

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

ComOps confirms that it is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.

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

We confirm our responses to the questions above have been authorised and approved in accordance with our published continuous disclosure policy or otherwise by our Board or an officer of COM with delegated authority from the board to respond to ASX on disclosure matters.

Yours faithfully

Christopher Brooke

Company Secretary & Chief Financial Officer



18 May 2018

Mr Christopher Brooke Company Secretary ComOps Limited Level 16 132 Arthur Street NORTH SYDNEY NSW 2060

By email

Dear Mr Brooke,

## ComOps Limited ("COM"): price query

We note the increase in the price of COM's securities from a closing price of 1.0 cent on 4 May 2018 to a closing price of 1.3 cents yesterday (17 May 2018) and to an intraday high of 1.7 cents today.

We also note the significant increase in the volume of COM's securities traded today.

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

- A. Is COM 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?
- B. If the answer to question 1 is "yes":
  - a) Is COM relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1?
    - Please note that the recent trading in COM's securities would suggest to ASX that such information may have ceased to be confidential and therefore COM 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?
- C. If the answer to question 1 is "no", is there any other explanation that COM may have for the recent trading in its securities?
- D. Please confirm that COM is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.
- E. Please confirm that COM'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 COM 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 (i.e. before 9.30 am AEST) on Monday, 21 May 2018. If we do not have your response by then, ASX will have no choice but to consider suspending trading in COM'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, COM'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. It should <u>not</u> 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 COM'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 COM'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, 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 COM'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 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.

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

Yours sincerely,

[Sent electronically without signature]

### **Clare Porta**

Adviser, Listings Compliance (Sydney)