

16 June 2017  
Via email: kate.kidson@asx.com.au

Ms Kate Kidson  
Principal Adviser  
Listing Compliance (Melbourne)  
20 Bridge St  
Sydney NSW 2000

Dear Kate

**Adairs Limited ("ADH"): price query**

I refer to your letter of 16 June 2017 and advise the following responses to the questions asked:

- ADH is not 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.

In particular, ADH is not aware of any information that its earnings for the 6 month period ending 30 June 2017 are likely to differ materially (upwards or downwards) from the current earnings guidance it has given for the period.

- There is no explanation that ADH are aware of that caused the recent trading in its securities.
- I confirm that ADH is in compliance with the Listing Rules, and, in particular, Listing Rule 3.1.
- I also confirm that ADH's responses to the questions asked have been authorised and approved in accordance with its published continuous disclosure policy.

If you have any queries about the above, please contact me on (03) 8888 4500.

Regards



Mandy Drake

Company Secretary  
Adairs Limited



16 June 2017

Mandy Drake  
Company Secretary  
Adairs Limited

By email only

Dear Ms Drake

**Adairs Limited (“ADH”): price query**

We note the change in the price of ADH’s securities from a low of 57 cents at close on Thursday, 15 June 2017 to an intraday high of 66.5 cents today.

We also note an increase in the volume of ADH’s securities traded today.

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

1. Is ADH 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?

In responding to this question, please consider in particular whether ADH is aware of any information that its earnings for the 6 month period ending on 30 June 2017:

- a) are likely to differ materially (downwards or upwards) from any earnings guidance it has given for the period; or
- b) if ADH has not given any earnings guidance for the period, are otherwise likely to come as a surprise to the market (by reference to analyst forecasts for the period or, if ADH is not covered by analysts, its earnings for the prior corresponding period)?

2. If the answer to question 1 is “yes”:

- a) Is ADH relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1?

Please note that the recent trading in ADH’s securities would suggest to ASX that such information may have ceased to be confidential and therefore ADH 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 ADH may have for the recent trading in its securities?
4. Please confirm that ADH is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that ADH’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 ADH 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 the close of trading (ie before 4.00 pm AEST) today, Friday, 16 June 2017. If we do not have your response by then, ASX will have no choice but to consider suspending trading in ADH’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, ADH’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 [kate.kidson@asx.com.au](mailto:kate.kidson@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 ADH’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 ADH’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 ADH’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]*

Kate Kidson  
**Principal Adviser, Listings Compliance (Melbourne)**