

'Defining Life's Signals'

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Ms. Cheng Tang  
Senior Advisor  
Listing Compliance (Melbourne)  
ASX Limited

24 July 2019

Dear Ms. Tang

**Response to Compumedics Limited (CMP) Price Query, 24 July 2019**

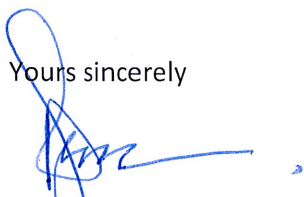
We have considered the ASX's query (attached) in relation to the change in price of the Company's securities from a close of 81.5 cents on 23 July 2019 to an intra-day high of 89.0 cents at the time of your letter to Compumedics Limited (Compumedics) and respond to those queries as follows:

1. Compumedics is not aware of any information concerning it that has not been announced to market which, if known by some in the market, could explain the trading in its securities.

Compumedics plans to release its full-year results (Appendix 4E) the last week of August 2019. At this point in time and subject to audit, Compumedics does not expect those results to materially differ (downwards or upwards) from the revenue and earnings guidance it has given for the period, which was last provided to market on 21 March 2019.

2. Not applicable
3. Compumedics is not aware of any other explanation for the recent trading in its securities. The Company continues to pursue its stated strategy, which is contained in communication available to market participants.
4. Compumedics confirms it is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.
5. These responses to the ASX's queries have been authorised and approved by its board.

Yours sincerely



David Lawson  
Company Secretary, Compumedics Limited





24 July 2019

Reference: ODIN04363

Mr David Lawson  
Company Secretary  
Compumedics Limited

By email only

Dear Mr Lawson

**Compumedics Limited ('CMP'): Price Query**

We note the change in the price of CMP's securities from a low of \$0.815 at close of trade yesterday to an intra-day high of \$0.89 at the time of writing.

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

**Request for Information**

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

1. Is CMP 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 CMP is aware of any information that its earnings for the 12 month period ending on 30 June 2019:

- (a) are likely to differ materially (downwards or upwards) from any earnings guidance it has given for the period; or
  - (b) if CMP 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 CMP is not covered by analysts, its earnings for the prior corresponding period)?]
2. If the answer to question 1 is "yes".
  - (a) Is CMP relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in CMP's securities would suggest to ASX that such information may have ceased to be confidential and therefore CMP 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 CMP may have for the recent trading in its securities?
4. Please confirm that CMP is complying with the Listing Rules and, in particular, Listing Rule 3.1.

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5. Please confirm that CMP'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 CMP 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 **2:00 PM AEST today Wednesday, 24 July 2019**. If we do not have your response by then, ASX will likely suspend trading in CMP'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, CMP'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](mailto: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 CMP'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 CMP'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 CMP'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*.

#### **Suspension**

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If you are unable to respond to this letter by the time specified above ASX will likely suspend trading in CMP'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

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**Cheng Tang**

Senior Adviser, Listings Compliance (Melbourne)