

CETTIRE

Level 40/140 William Street
Melbourne VIC 3000

15 June 2021

Kate Kidson
Principal Adviser, Listings Compliance (Melbourne)
By email: kate.kidson@asx.com.au

Dear Ms Kidson

Cettire Limited (CTT) – Response to price query

Cettire Limited (**Cettire** or the **Company**) refers to your letter of 15 June 2021.

The Company's responses to the questions and requests for information in your letter are as follows.

1. Is CTT 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 CTT is aware of any information that its earnings for the 12 month period ending on 30 June 2021:

(a) are likely to differ materially (downwards or upwards) from any earnings guidance it has given for the period; or

(b) if CTT 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 CTT is not covered by analysts, its earnings for the prior corresponding period)?

No.

Cettire recently provided guidance to the market on 3 May 2021, to the effect that the Company expected sales revenue for FY21 to be "at least \$80.0 million", and statutory EBITDA to be positive (subject to timing of select brand marketing initiatives).

Cettire remains of the view that this earnings (statutory EBITDA) guidance is materially correct. Based on unaudited current sales figures, Cettire expects that sales revenue for FY21 will now be at least \$85 million. A further update may be provided closer to financial year end when a more accurate estimate is available. In any event, the Company does not believe that this information (which has not been shared with others in the market) would explain today's trading in CTT securities.

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 CTT may have for the recent trading in its securities?

Yes. Cettire believes that the 11 June article in the Australian Financial Review may explain the recent trading in CTT securities, in particular today's price movement. Cettire makes the following comments.

Cettire has developed a unique and compelling no inventory business model, leveraging proprietary technology and processes, which collectively enable a high degree of automation and scalability. The Company operates in the attractive luxury goods market and, given considerable trading momentum, will exceed its FY21 Prospectus forecasts (as reflected in the trading update released on 3 May 2021 and further updated in this letter in the response to Question 1).

Cettire has confidence in the sustainability of its supply chain and the authenticity of the products available on its platform. Cettire sources products from a large and diversified global network of suppliers, with what it believes is minimal concentration risk. Cettire's supply network has continued to grow since IPO. The

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Company's published in-stock product count has increased from ~54,000 at 31 December 2020 to ~73,000 at 15 June 2021. Cettire's supply arrangements are underpinned by legal contracts which further attest to the authenticity of the products made available via Cettire's platform.

The Company does not have any product suppliers based in China.

Cettire is in continued discussions with various brand owners around partnership opportunities. Should these discussions materialise into partnerships, the Company believes it would be complementary to its existing supply chain.

The Company confirms all applicable customs duties and consumption taxes including VAT are incorporated into pricing in the relevant markets in which it operates.

Cettire's platform is not currently accessible in certain markets as the Company prioritises its global expansion. It is incorrect to assert that this is to prevent brand owners, many of whom are multinational organisations, from seeing products and prices on its platform. The Company is not aware of any restrictions or restraints that would prevent it from operating in markets where it is not currently operating in the future.

The Company's proprietary core technology stack is a key point of differentiation, enabling extensive automation of marketing and core e-commerce workflows. This has enabled Cettire to operate globally and rapidly scale, with minimal human intervention and minimal headcount. Shopify currently provides Cettire with an e-commerce shopfront and checkout solution that does not form part of the Company's core technology stack.

Cettire does not have any material exposure to Google organic search algorithms.

The Company welcomes all customer feedback. It does not have the ability to remove negative online reviews on 3rd party platforms.

Cettire looks forward to keeping its shareholders updated on its operational initiatives and global growth progress. The Company will release its FY21 audited results in late August.

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

This is confirmed.

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

The above responses have been authorised and approved by Cettire's Board of Directors.



Kerry Robert East
Chair
Cettire Limited



15 June 2021

Mr Timothy Hume
Chief Financial Officer
Cettire Limited

By email: timothy.hume@cettire.com

Dear Mr Hume

Cettire Limited ('CTT'): Price - Query

ASX refers to the following:

- A. The change in the price of CTT's securities from a high of \$2.23 to a low of \$1.795 today.
- B. The article appearing in the Australian Financial Review on 11 June 2021 'Cettire Shares Soar despite working in a 'cloud of mystery.'

Request for information

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

1. Is CTT 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 CTT is aware of any information that its earnings for the 12 month period ending on 30 June 2021:

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

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5. Please confirm that CTT'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 CTT 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 3pm AEST on 15 June 2021. 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, CTT'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 CTT to request a trading halt immediately.

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.

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 CTT'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 CTT's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

In responding to this letter, you should have regard to CTT'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 CTT'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

We reserve the right to release a copy of this letter, your reply and any other related correspondence between us to the market under Listing Rule 18.7A.

Questions

If you have any questions in relation to the above, please do not hesitate to contact me.

Yours sincerely

Kate Kidson

Principal Adviser, Listings Compliance (Melbourne)