



15 March 2019

Mr C Hesford  
Adviser, Listings (Perth)  
ASX Compliance Pty Limited  
Level 40 Central Park  
152-158 St Georges Terrace  
PERTH WA 6000

**BY EMAIL**

Dear Mr Hesford

**Price and Volume Query**

Reference is made to the query letter dated 15 March 2019 regarding the price and volume movements of Manhattan Corporation Limited (**the Company**). The Company wishes to advise the following:

1. The Company is not aware of any information that has not already been announced which might explain the recent trading in the Securities of the Company.
2. Not Applicable.
3. The Company is not aware of any other explanation for the price and volume changes in the Securities of the Company other than the recent announcements.
4. The Company confirms it believes it is in compliance with the Listing Rules and in particular, Listing Rule 3.1.
5. The Company's responses to the questions raised by this price and volume query have been authorised and approved in accordance with its published continuous disclosure requirements. The full Board have approved this response.

**Eryn Kestel**  
**Company Secretary**



15 March 2019

Ms Eryn Kestel  
Company Secretary  
Manhattan Corporation Limited  
Level 2, 33 Colin Street  
WEST PERTH WA 6005  
By email: [eryn@kestelcorp8.com.au](mailto:eryn@kestelcorp8.com.au)

Dear Ms Kestel

### **Manhattan Corporation Limited ('MHC'): Price Query**

We note the change in the price of MHC's securities from a closing price of \$0.003 on 13 March 2019 to a high of \$0.006 today.

We also note the significant increase in the volume of MHC's securities traded from 13 March 2019 to 15 March 2019.

### **Request for Information**

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

1. Is MHC 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 MHC relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in MHC's securities would suggest to ASX that such information may have ceased to be confidential and therefore MHC 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 MHC may have for the recent trading in its securities?
4. Please confirm that MHC is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that MHC'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 MHC 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 **6 AM AWST Monday, 18 March 2019**. If we do not have your response by then,

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ASX will likely suspend trading in MHC'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, MHC'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 [ListingsCompliancePerth@asx.com.au](mailto:ListingsCompliancePerth@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 MHC'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 MHC'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 MHC'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**

If you are unable to respond to this letter by the time specified above ASX will likely suspend trading in MHC's securities under Listing Rule 17.3.

### **Enquiries**

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

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Kind regards

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**Chris Hesford**  
Adviser, Listings Compliance (Perth)