

24 November 2020

Ivan Tatkovich
Adviser, Listings Compliance (Sydney)
ASX Limited

By email: Ivan.Tatkovich@asx.com.au

Dear Mr Tatkovich

Webcentral Group Limited (“WCG”): Price Query

We refer to your letter of 23 November 2020 in relation to the above matter.

We provide a response to each of your questions below (adopting the numbering in your letter):

1. No.
2. Not applicable, in view of our response to question 1.
3. WCG is not aware of any other explanation for the recent trading in its securities.
4. WCG confirms that it is in compliance with the Listing Rules, including Listing Rule 3.1.
5. The above responses have been authorised and approved under its published continuous disclosure policy and the authorised for release by WCG Managing Director, Joseph Demase.

Yours sincerely



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Glen Dymond - for and on behalf of Webcentral Group Limited
Joint Company Secretary



23 November 2020

Reference: 28250

Mr Glen Dymon
Joint Company Secretary
Webcentral Group Limited
Level 23
680 George Street
Sydney NSW 2000

By email:

Dear Mr Dymon

Webcentral Group Limited ('WCG'): Price - Query

ASX refers to the following:

- A. The change in the price of WCG's securities from a close of \$0.275 on Thursday, 19 November 2020 to a high of \$0.49 today.

Request for information

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

1. Is WCG 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 WCG is aware of any information that its earnings for the 12 month period ending on 31 December 2020:

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

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4. Please confirm that WCG is complying with the Listing Rules and, in particular, Listing Rule 3.1.
 5. Please confirm that WCG'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 WCG 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 **9:30 AM AEDT Tuesday, 24 November 2020**. 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, WCG'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 WCG to request a trading halt immediately.

Your response should be sent to me by e-mail. 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 WCG'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 WCG's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

In responding to this letter, you should have regard to WCG'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 WCG'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.

Regards

Ivan Tatkovich

Adviser, Listings Compliance (Sydney)

CC: Michael Wilton, Webcentral Group Limited