

9 February 2023

Mr Shane Falconer  
Adviser, Listings Compliance  
Australian Securities Exchange  
Level 40, Central Park  
152 – 158 St Georges Terrace  
PERTH WA 6000

**By Email:       ListingsCompliancePerth@asx.com.au**

Dear Shane

**ASX Price and Volume Query – ASX Code: MCE**

We refer to the Price and Volume Query from ASX dated 9 February 2023 in relation to the change in the price of MCE's securities from a low of \$0.29 at market close on 7 February 2023 to an intraday high of \$0.37 today (at the time of writing your letter), and the significant increase in the volume of MCE's securities traded from 6 February 2023 to 9 February 2023.

We respond as follows to the specific questions asked:

- 1.       Is MCE 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?**

No. The Company 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.

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

- (a)     Is MCE relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1?**
- (b)     Can an announcement be made immediately?**
- (c)     If an announcement cannot be made immediately, why not and when is it expected that an announcement will be made?**

The answer to question 1 is 'no' – therefore not applicable.

- 3.       If the answer to question 1 is “no”, is there any other explanation that MCE may have for the recent trading in its securities?**

The Company notes that, as announced to the market on 21 December 2022, it has secured a large binding purchase order valued at approximately \$44 million to deliver a SURF distributed buoyancy system for a major international deepwater project. In particular, the purchase order lifts the Company's current secured order bank to circa \$77 million. Following the release of that announcement the Company has noted increased investor interest.

We also note that the Company's Chief Financial Officer, Aaron Begley, presented to the Bell Potter Unearthed 2023 conference on Monday, 6 February 2023, and that a copy of that presentation was released to the market prior to the presentation.

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

We confirm that the Company is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.

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

The Company confirms that the responses to the questions above have been authorised and approved under its published continuous disclosure policy.

Yours sincerely



**BRENDAN COCKS**

Chief Financial Officer & Joint Company Secretary



9 February 2023

Reference: 67837

Mr Brendan Cocks & Mr Paul Hardie  
Company Secretary  
Matrix Composites & Engineering Limited

By email: [brendan.cocks@matrixengineered.com](mailto:brendan.cocks@matrixengineered.com); [paul.hardie@matrixengineered.com](mailto:paul.hardie@matrixengineered.com)

Dear Mr Cocks & Mr Hardie

### **Matrix Composites & Engineering Limited ('MCE'): Price - Query**

ASX refers to the following:

- A. The change in the price of MCE's securities from \$0.29 at the close of trading on 7 February 2023 to an intraday high of \$0.37 today, 9 February 2023 at the time of writing this letter.
- B. The significant increase in the volume of MCE's securities traded from 6 February 2023 to 9 February 2023.

### **Request for information**

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

1. Is MCE 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 MCE relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in MCE's securities would suggest to ASX that such information may have ceased to be confidential and therefore MCE 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 MCE may have for the recent trading in its securities?
4. Please confirm that MCE is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that MCE'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 MCE 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 **10 AM AWST Thursday, 9 February 2023**. 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

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within the exceptions mentioned in Listing Rule 3.1A, MCE'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 MCE to request a trading halt immediately.

Your response should be sent to me by e-mail at **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.

### **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 MCE'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 MCE's securities under Listing Rule 17.3.

### **Listing Rules 3.1 and 3.1A**

In responding to this letter, you should have regard to MCE'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 MCE'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 faithfully

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**Shane Falconer**

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Adviser, Listings Compliance