



Netccentric Limited (200612086W)

Listed on the ASX

600 North Bridge Road
#23-01 Parkview Square
Singapore 188778

www.netccentric.com

Mr Alex Sutton
Adviser, Listings Compliance (Sydney)
ASX Limited
20 Bridge Street
SYDNEY NSW 2000

By email:

RE: ASX Price Query

We refer to your letter of 19 February 2021 (Query Letter) to Netccentric Limited ("NCL" or the "Company") and adopting similar paragraph numbering as contained therein we respond as follows:

1. NCL 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. N/A
3. NCL has been contemplating a number of small acquisitions all of which are incomplete and individually would not be material. In relation to one of these potential acquisitions, the Company has entered a non-binding conditional term sheet to acquire a business in the online media sector in Malaysia. This transaction whilst synergistic is not material in relation to either revenue or purchase price and is not certain to proceed.

The Company is also considering a circa \$2m placement however at this stage has not determined the key terms of the placement or whether to proceed with it.

The Company further notes current high levels of interest in tech and ecommerce companies with exposure to South East Asia.

4. The Company confirms that it is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.
5. NCL confirms that the answers above have been approved by the Netccentric board of directors.

We trust this answers your queries.

Yours faithfully

A handwritten signature in black ink, appearing to be 'S. S.', written over a horizontal line.

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Lee Tamplin
Company Secretary

Netccentric Limited (200612086W)
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19 February 2021

Mr Lee Tamplin
Company Secretary
Netccentric Limited
18 Roberts Lane
Singapore 218297

By email:

Dear Mr Tamplin

Netccentric Limited ('NCL'): Price - Query

ASX refers to the following:

- A. The change in the price of NCL's securities from a low of \$0.095 to a high of \$0.175 today.
- B. The significant increase in the volume of NCL's securities traded from 18 February 2021 to 19 February 2021.

Request for information

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

- 1. Is NCL 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 NCL relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in NCL's securities would suggest to ASX that such information may have ceased to be confidential and therefore NCL 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 NCL may have for the recent trading in its securities?
- 4. Please confirm that NCL is complying with the Listing Rules and, in particular, Listing Rule 3.1.
- 5. Please confirm that NCL'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 NCL 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 **03:00 PMAEDT Friday, 19 February 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

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

Your response should be sent to me by e-mail at ListingsComplianceSydney@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 NCL'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 NCL's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

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

Kind regards

Alex Sutton

Alex Sutton
Compliance Adviser, Geology, Listings Compliance (Sydney)

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