

OM HOLDINGS LIMITED

(ARBN 081 028 337)



No. of Pages Lodged: 1

4 December 2020

Mr Wade Baggott
Manager, Listings Compliance (Perth)
ASX Compliance Pty Limited
Level 40, Central Park
152-158 St George's Terrace
Perth WA 6000

By email: ListingsCompliancePerth@asx.com.au

Dear Mr Baggott,

OM Holdings Limited (ASX: OMH) (“the Company”) – Price Query

We refer to your letter dated 4 December 2020 in relation to a noted change in the price of the Company’s securities between today and 3 December 2020, and an increase in the trading volume of the Company’s securities today.

We provide the following response to your queries:

1. 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. Not applicable.
3. No.
4. The Company is in compliance with the ASX Listing Rules and in particular with ASX Listing Rule 3.1.
5. These responses have been authorised and approved in accordance with its published continuous disclosure policy or otherwise by its Board or an officer of the Company with delegated authority from the Board to respond to ASX on disclosure matters.

Yours faithfully

OM HOLDINGS LIMITED

Heng Siow Kwee/Julie Wolseley
Company Secretary



4 December 2020

Ms Julie-Anne Wolseley
Company Secretary
OM Holdings Limited

By email:

CC: Mrs Heng Siow Kee

Dear Ms Wolseley

OM Holdings Limited ('OMH'): Price - Query

ASX refers to the following:

- A. The change in the price of OMH's securities from a closing price of \$0.335 yesterday 3 December 2020, to an intra-day high at the time of writing of \$0.435 today.
- B. The significant increase in the volume of OMH's securities traded today.

Request for information

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

1. Is OMH 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 OMH relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in OMH's securities would suggest to ASX that such information may have ceased to be confidential and therefore OMH 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 OMH may have for the recent trading in its securities?
4. Please confirm that OMH is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that OMH'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 OMH with delegated authority from the board to respond to ASX on disclosure matters.

When and where to send your response

For personal use only

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 **2:00 PM WST Today**. 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, OMH'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 OMH 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 OMH'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 OMH's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

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

Wade Baggott
Manager, Listings Compliance (Perth)

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