

01 August 2019

Maria Clemente
Adviser, Listing Compliance
ASX
20 Bridge Street
Sydney NSW 2000

e-mail: maria.clemente@asx.com.au

Dear Maria,

Re: Dicker Data Limited (DDR) Price Query – Reference 04875

I write in response to your letter dated 01 August 2019 in relation to the DDR securities trading from a high of \$7.85 on 31 July 2019 to a low of \$5.81 on 01 August 2019.

Please see below in red the responses to your specific questions:

Is DDR 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?

DDR is not aware of any additional information which could relate to the fluctuation of the share price. The share price is a function of market and out of the control of the Board / Company.

In responding to this question, please consider in particular whether DDR is aware of any information that its earnings for the 6-month period ending on 30 June 2019:

- (a) are likely to differ materially (downwards or upwards) from any earnings guidance it has given for the period; or

DDR will be releasing their half yearly results at the end of August, which are in line with guidance expectations for the period and previously released to the market.

As I mentioned previously, DDR will be releasing an announcement in early August in relation to the sale of their property at 230 Captain Cook drive, which has a material value, however the contracts have not been exchanged and this information is strictly confidential.

DDR is complying with the Listings Rules, in particular Listing Rule 3.1 and 3.1A and are aware of their obligations under Guidance Note 8 Continuous Disclosure.

The Company is not aware of any additional information necessary to inform the market about in relation to the share price fluctuations.

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Best



Erin McMullen

Company Secretary

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1 August 2019

Reference: 04875

Ms Erin McMullen
Company Secretary
Dicker Data Limited

By email: erinm@companysecretaryaustralia.com.au

Dear Ms McMullen

Dicker Data Limited ('DDR'): Price Query

We note the change in the price of DDR's securities from a high of \$7.85 on 31 July 2019 to a low of \$5.81 today.

We also note the elevated volume of DDR's securities traded from 31 July 2019 to 1 August 2019.

Request for Information

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

1. Is DDR 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 DDR is aware of any information that its earnings for the 6 month period ending on 30 June 2019:

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

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5. Please confirm that DDR'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 DDR 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 **12:30 PM AEST today Thursday, 1 August 2019**. If we do not have your response by then, ASX will likely suspend trading in DDR'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, DDR'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. 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 DDR'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 DDR'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 DDR'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 DDR's securities under Listing Rule 17.3.

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Enquiries

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

Yours sincerely

Maria Clemente
Adviser, Listings Compliance (Sydney)