



Manaccom Corporation Limited

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3 March 2008

Mr Patrick O'Connor
Adviser, Issuers (Brisbane)
Australian Securities Exchange
Level 5 Riverside Centre
123 Eagle Street
Brisbane Qld 4000

Dear Mr O'Connor,

We refer to your letter of 28 February 2008 and advise as follows:

1. *When did the Company first become aware that its result for the half year ended 31 December 2007 would be likely to vary by 15% or more from the previous corresponding period (the "Information")?*

Please note that ASX is of the opinion that when a company becomes aware that their profits or losses may be materially different from the previous corresponding period, the company should make an announcement to the market immediately indicating the scale and direction of any change. An entity in this situation should not wait until their Half Year Report is due to inform the market of the results.

In view of the acquisition of the Manaccom business on 31 August 2007 the Company became aware that the results for the financial year ending 30 June 2008 would be significantly increased. Hence the profit warning announcement the Company made on 18 September 2007.

The Company became aware of the final audited half yearly results on 20 February 2008. This was the day the Audit Committee was provided with the preliminary figures and met with the Auditors to resolve the treatment of a number of potentially contentious items that would have significantly affected the final half year results.

2. *If the Company became aware of the Information prior to the release of the Appendix 4D, please identify any earlier announcement from the Company which disclosed that result for the half year ended 31 December 2007 would be significantly different from the previous corresponding period.*

Not applicable.

3. *Does the Company consider that the Information concerning the result for the half year ended 31 December 2007 was material to the Company?*

Yes.

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4. *If the answer to question 3 is "no", please advise the basis on which the Company does not consider the Information concerning the result for the half year ended 31 December 2007 to be material.*

Not applicable.

5. *If there was no earlier announcement, and the Company became aware of the result for the half year ended 31 December 2007 prior to 21 February 2008, please advise why the information was not released to the market at an earlier time. Please comment specifically with respect to listing rule 3.1.*

The results were finalised and the covering announcement to the market was prepared during the afternoon of 20 February 2008. The Company considered that releasing the results before the market opened on 21 February 2008 was not fundamentally different to releasing late on 20 February 2008 which was when the final announcement was completed.

This announcement gave updated profit guidance for the full year, displaying the Company's commitment to continuous disclosure.

6. *Please confirm that the Company is in compliance with the listing rules and, in particular, listing rule 3.1.*

The Company is in compliance with the listing rules and, in particular, listing rule 3.1.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Bill Lyne', is written over a faint, light blue circular background.

Bill Lyne
Company Secretary

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28 February 2008

Mr Bill Lyne
Company Secretary
Manaccomm Corporation Limited
Manaccomm House
8-10 Camford Street
MILTON QLD 4064

By email: billlyne@manaccomm.com

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Dear Mr Lyne

Manaccomm Corporation Limited (the "Company")

We refer the Company to the following.

1. The Appendix 4D Half Year Report for the 6 months ended 31 December 2007 which was lodged by the Company with ASX Limited ("ASX"), at 9.47 am E.D.S.T. on Thursday, 21 February 2008, and which reported a Net Profit after Tax of \$764,199 up 257% on the previous corresponding period (the "Appendix 4D").

As you are aware, listing rule 3.1 requires an entity, once it becomes *aware* of 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, to immediately tell ASX that information. The exceptions to this requirement are set out in listing rule 3.1A.

We wish to draw your attention to the definition of "aware" in chapter 19 of the listing rules, which states as follows.

"an entity becomes aware of information if a director or executive director (in the case of a trust, director or executive officer of the responsible entity or management company) has, or ought reasonably to have, come into possession of the information in the course of the performance of their duties as a director or executive officer of that entity."

Paragraph 17 of Guidance Note 8 states:

"Once a director or executive officer becomes aware of information, he or she must immediately consider whether that information should be given to ASX. An entity cannot delay giving information to ASX pending formal sign-off or adoption by the board, for example."

Listing rule 3.1A sets out an exception from the requirement to make immediate disclosure, provided that each of the following are satisfied.

- 3.1A.1 A reasonable person would not expect the information to be disclosed.*
- 3.1A.2 The information is confidential and ASX has not formed the view that the information has ceased to be confidential.*
- 3.1A.3 One or more of the following applies.*
- It would be a breach of a law to disclose the information.*
 - The information concerns an incomplete proposal or negotiation.*
 - The information comprises matters of supposition or is insufficiently definite to warrant disclosure.*
 - The information is generated for the internal management purposes of the entity.*
 - The information is a trade secret."*

Furthermore, paragraph 93 of ASX Guidance Note 8 – Continuous Disclosure, states the following in relation to the provision of guidance regarding an entity's results.

"As a general policy, a variation in excess of 10% to 15% may be considered material, and should be announced by the entity as soon as the entity becomes aware of the variation. If the entity has not made a forecast, a similar variation from the previous corresponding period will need to be disclosed."

Example B in Guidance Note 8 also notes that if, on reviewing management accounts, an entity becomes aware that the actual revenues and profits for a period will vary to a material extent from the financial results for the previous corresponding period, disclosure would be required. In making this disclosure, the entity must provide some details, however qualified, of the extent of the variation.

Having regard to this definition, listing rule 3.1 and Guidance Note 8, we ask that you answer the following questions.

1. When did the Company first become aware that its result for the half year ended 31 December 2007 would be likely to vary by 15% or more from the previous corresponding period (the "Information")?
Please note that ASX is of the opinion that when a company becomes aware that their profits or losses may be materially different from the previous corresponding period, the company should make an announcement to the market immediately indicating the scale and direction of any change. An entity in this situation should not wait until their Half Year Report is due to inform the market of the results.
2. If the Company became aware of the Information prior to the release of the Appendix 4D, please identify any earlier announcement from the Company which disclosed that result for the half year ended 31 December 2007 would be significantly different from the previous corresponding period.
3. Does the Company consider that the Information concerning the result for the half year ended 31 December 2007 was material to the Company?
4. If the answer to question 3 is "no", please advise the basis on which the Company does not consider the Information concerning the result for the half year ended 31 December 2007 to be material.
5. If there was no earlier announcement, and the Company became aware of the result for the half year ended 31 December 2007 prior to 21 February 2008, please advise why the information was not released to the market at an earlier time. Please comment specifically with respect to listing rule 3.1.

10. Please confirm that the Company is in compliance with the listing rules and, in particular, listing rule 3.1.

Your responsibility under listing rule 3.1 is not confined to, or necessarily satisfied by, answering the questions set out in this letter. If the information requested by this letter is information required to be given to ASX under listing rule 3.1, your obligation is to disclose the information immediately.

If you are unable to respond by the time requested, you should consider a request for a trading halt in the Company's securities. As set out in listing rule 17.1 and Guidance Note 16 - Trading Halts, we may grant a trading halt at your request. We may require the request to be in writing. We are not required to act on your request. You must tell ASX each of the following.

- 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.
- Any other information necessary to inform the market about the trading halt, or that we may ask for.

The trading halt cannot extend past the commencement of normal trading on the second day after the day on which it is granted. If a trading halt is requested and granted and you are still unable to reply to this letter before the expiry of the trading halt at the commencement of trading on Wednesday, 5 March 2008, suspension from quotation would normally be imposed by us from the commencement of trading if not previously requested by you. The same applies if you have requested a trading halt because you are unable to release information to the market, and are still unable to do so before the commencement of trading.

Please send your response to me on **facsimile number (07) 3832 4114** or by **email to patrick.oconnor@asx.com.au**. Your response should not be sent to the Company Announcements Office. Unless the information is required immediately under listing rule 3.1, a response is requested as soon as possible, and in any event, not later than **12.00 pm EST (1.00 pm EDST) on Monday, 3 March 2008**.

Please note that ASX reserves the right, under listing rule 18.7A, to release this letter and the Company's response to the market if it considers it necessary for an informed market. Accordingly, it would be appreciated if you would prepare your response in a format suitable for release to the market and separately address each of the questions asked.

If you have any concerns about release of your response, or any queries in relation to this matter, please contact me immediately.

Yours sincerely



Patrick O'Connor
Adviser, Issuers (Brisbane)