

28 June 2007

Frances Finucan
Adviser, Issuers (Brisbane)
ASX Markets Supervision Pty Ltd
Riverside Centre
Level 5, 123 Eagle Street
Brisbane QLD 4000

Dear Frances,

Re: Response to letter dated 26 June 2007

As requested, the Company provides the following responses to your letter dated 26 June 2007.

1. Whether the Company considers that the information contained in the Announcement concerning the acquisition of Manaccomm (“Information”) was material to the Company?

Yes.

2. If the answer to question 1 is “no”, please advise the basis on which the Company does not consider the Information to be material.

Not Applicable

3. If the answer to question 1 is “yes”, please advise when the Company became aware of the Information, and specifically:

3.1 When the Company first commenced the negotiations that led to the conditional Heads of Agreement with Manaccomm (“Manaccomm Agreement”).

3.2 When the Manaccomm Agreement was signed by each of Manaccomm and the Company.

Serious negotiations commenced on or about 24 May 2007, although Jumbo has retailed Manaccomm products for a number of years and the possibility of an acquisition had been previously discussed, but no agreement was reached.

Negotiations also commenced on or around 4 June 2007 with an alternate potential acquisition.

At a board meeting on 13 June 2007, directors resolved to appoint a sub-committee to improve the terms of both proposals.

At a board meeting at 4pm 21 June 2007 directors discussed both acquisitions at length and made a decision to proceed to the Heads of Agreement for Manaccomm at approximately 6pm.

At 8am 22 June 2007, an appointment was made with the ASX for 10.30am to discuss the announcement. 2 board members met with the ASX at 10.30am and a trading halt was requested soon after.

The Manaccomm Heads of Agreement was signed 25 June 2007.

4. If the Company became aware of the Information prior to the Trading Halt Request, please identify any earlier announcement from the Company which disclosed the Information.

An announcement was made on 8 June 2007 that contained a paragraph "Acquisition Update" and noted that effort has been focused on a shortlist of opportunities.

Further mention was made of Jumbo's intention to make an acquisition in announcements dated:

- 30 April 2007 (Company update and share buy back)
- 28 February 2007 (Half Year Results)
- 9 February 2007 (Profit Guidance)

5. If there was no earlier announcement, and the Company became aware of the Information prior to the Trading Halt Request, please advise why the Company did not release the Information to the market at an earlier time, or request a trading halt before Friday, 22 June 2007, pending the release of the Announcement.

Not Applicable.

Please comment specifically on the application of listing rule 3.1 and the exceptions to the rule in listing rule 3.1A, and whether the increase in the Company's share price and the volume of securities traded in the days prior to the Trading Halt Request, indicated that confidentiality in relation to the Information had been lost.

Directors were not aware of any specific reason causing the increase in the Company's share price and the volume in the days prior to the Trading Halt Requested.

Directors were not in a position to release further information to the information contained in the announcement dated 8 June 2007 until after the board meeting in the evening of 21 June 2007.

Share Buy Back

On 30 April 2007, Jumbo announced its intention to undertake an on-market share buy back of up to 37 million shares. The Company then made further Appendix 3E Daily Share Buy Back Notices on 15 May, 16 May and 13 June 2007. Directors sought independent advice that concluded that the share buy back represents a sound capital management initiative to enhance shareholder value. This may have encouraged investors to invest in Jumbo shares.

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

Directors believe the Company is in compliance of the listing rules, in particular listing rule 3.1.

Yours Sincerely

A handwritten signature in black ink, appearing to read "Mike Veverka". The signature is fluid and cursive, with a long horizontal stroke at the beginning.

Mike Veverka
Chief Executive Officer



ASX Limited
ABN 49 008 624 691
Level 5
Riverside Centre
123 Eagle Street
Brisbane QLD 4000

PO Box 7055
Riverside Centre
Brisbane QLD 4001

Telephone 61 7 3835 4000
Facsimile 61 7 3832 4114
Internet <http://www.asx.com.au>

26 June 2007

Mr David Taplin
Company Secretary
Jumbo Corporation Ltd
Level 19, Riverside Centre
123 Eagle Street
BRISBANE QLD 4000

By email: davidt@jumbocorporation.com

Dear Mr Taplin

Jumbo Corporation Ltd (the "Company")

ASX Limited ("ASX") refers to the following:

1. The Company's request for a trading halt, released to the market at 11.14am (EST) on Friday, 22 June 2007 ("Trading Halt Request").
2. The announcement released to the market at 12.00pm (EST) on Monday, 25 June 2007 entitled, "Jumbo to Acquire Manacom" ("Announcement").
3. The increase in the Company's share price from a close of 2.3 cents on Friday, 15 June 2007 to a high of 3.2 cents on Thursday, 21 June 2007 being the five trading days immediately prior to the Trading Halt Request and to an increase in the number of securities traded during this period.

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.

I would also like to draw your attention to the definition of “aware” in Chapter 19 of the listing rules. This definition states that:

“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.”

Furthermore, 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.”*

Finally, I would like to draw your attention to ASX’s policy position on the concept of “confidentiality” which is detailed in paragraphs 33 to 39 of Guidance Note 8. In particular, paragraphs 34 and 35 of the Guidance Note state that:

“Confidential’ in this context has the sense of ‘secret’...” and “Loss of confidentiality may be indicated by otherwise unexplained changes to the price of the entity’s securities, or by reference to the information in the media or analysts reports”.

Having regard to the above definition, listing rule 3.1 and Guidance Note 8 - Continuous Disclosure, ASX asks that you answer the following questions in a format suitable for release to the market in accordance with listing rule 18.7A.

1. Whether the Company considers that the information contained in the Announcement concerning the acquisition of Manacomm (“Information”) was material to the Company?
2. If the answer to question 1 is “no”, please advise the basis on which the Company does not consider the Information to be material.
3. If the answer to question 1 is “yes”, please advise when the Company became aware of the Information, and specifically:
 - 3.1 When the Company first commenced the negotiations that led to the conditional Heads of Agreement with Manacomm (“Manacomm Agreement”).

- 3.2 When the Manaccomm Agreement was signed by each of Manaccomm and the Company.
4. If the Company became aware of the Information prior to the Trading Halt Request, please identify any earlier announcement from the Company which disclosed the Information.
 5. If there was no earlier announcement, and the Company became aware of the Information prior to the Trading Halt Request, please advise why the Company did not release the Information to the market at an earlier time, or request a trading halt before Friday, 22 June 2007, pending the release of the Announcement.

Please comment specifically on the application of listing rule 3.1 and the exceptions to the rule in listing rule 3.1A, and whether the increase in the Company's share price and the volume of securities traded in the days prior to the Trading Halt Request, indicated that confidentiality in relation to the Information had been lost.

6. 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.

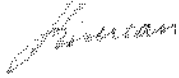
The trading halt cannot extend past the commencement of normal trading on the second day after the day on which it is granted. If a trading halt is requested and granted and you are still unable to reply to this letter before the expiry of the trading halt at the commencement of trading on the second trading day following grant of the trading halt, 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.

Your response should be sent to me by **e-mail at frances.finucan@asx.com.au** or by facsimile on **facsimile number (07) 3832 4114**. It 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 **9.00am on Friday, 29 June 2007**.

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,



Frances Finucan
Adviser, Issuers (Brisbane)

Copy Mr Mike Veverka
CEO
By email: mike@jumbocorporation.com