

28 March 2011

By Email: justin.nelson@asx.com.au

Mr Justin Nelson
Manager, Issuers (Adelaide)
ASX Compliance Pty Limited
91 King William Street
ADELAIDE SA 5000

Codan Limited
ABN 77 007 590 605
81 Graves Street
Newton SA 5074
Australia

PO Box 96
Campbelltown SA 5074
Australia

Dear Justin

(Codan Limited) (the "Company") RE: PRICE QUERY

This letter is in response to your letter dated 28 March 2011 concerning the change in the price of our Company's securities from a closing price of \$1.24 on 24 March 2011 to a high of \$1.50 today.

In response to your queries we respond as follows:

1. **Is the Company aware of any information concerning it that has not been announced which, if known, could be an explanation for recent trading in the securities of the Company?**

The Company is not aware of any information concerning it that has not been announced which, if known, could be an explanation for recent trading in the securities of the Company.

2. **If the answer to question 1 is yes, can an announcement be made immediately? If not, why not and when is it expected that an announcement will be made?**

Not applicable.

3. **Is there any other explanation that the Company may have for the price change and increase in volume in the securities of the Company?**

On 24 March 2011 Peter Switzer discussed the Company on Sky News Business when he had Roger Montgomery, a popular online trading blogger, on his segment. Following Mr Switzer's segment, on 25 March 2011 Mr Montgomery published an article about the Company detailing the Company's profits and return on equity. The Company considers that this may have had an impact on the price change and increase in volume of trading in the securities of the Company.

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

The Company can confirm that it is in compliance with the listing rules, and, in particular, listing rule 3.1.

Yours sincerely



Michael Barton
Company Secretary



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Michael Barton
Company Secretary
Codan Limited
81 Graves street
Newton SA 5074

By email: Michael.barton@codan.com.au

Dear Mr Barton,

(Codan Limited) (the "Company") RE: PRICE QUERY

We have noted a change in the price of the Company's securities from a closing price of \$1.24 on 24 March 2011 to high of \$1.50 today. We have also noted an increase in the volume of trading in the securities over this period.

In light of the price change and increase in volume, please respond to each of the following questions.

1. Is the Company aware of any information concerning it that has not been announced which, if known, could be an explanation for recent trading in the securities of the Company ?

Please note that as recent trading in the Company securities could indicate that information has ceased to be confidential, the Company is unable to rely on the exceptions to listing rule 3.1 contained in listing rule 3.1A when answering this question.

2. If the answer to question 1 is yes, can an announcement be made immediately? If not, why not and when is it expected that an announcement will be made?

Please note, if the answer to question 1 is yes and an announcement cannot be made immediately, you need to contact us to discuss this and you need to consider a trading halt (see below).

3. Is there any other explanation that the Company may have for the price change and increase in volume in the securities of the Company ?

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

Your response should be sent to me by e-mail at justin.nelson@asx.com.au. 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 **4.00 pm EDST on 28 March 2011**

Australian Securities Exchange

Australian Stock Exchange
Sydney Futures Exchange

Australian Clearing House
SFE Clearing Corporation

ASX Settlement and Transfer Corporation
Austraclear

Under listing rule 18.7A, a copy of this query and your response will be released to the market, so your response should be in a suitable form and separately address each of the questions asked. If you have any queries or concerns, please contact me immediately.

Listing rule 3.1

Listing rule 3.1 requires an 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. The exceptions to this requirement are set out in listing rule 3.1A.

In responding to this letter you should consult listing rule 3.1 and Guidance Note 8 – Continuous Disclosure: listing rule 3.1.

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.

Your responsibility under listing rule 3.1 is not confined to, or necessarily satisfied by, answering the questions set out in this letter.

Trading halt

If you are unable to respond by the time requested, or if the answer to question 1 is yes and an announcement cannot be made immediately, 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 us 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 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 commencement of trading, 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.

If you have any queries regarding any of the above, please let me know.

Yours sincerely,

Justin Nelson

Manager, Issuers (Adelaide)