

16 September 2020

ASX Limited
Stephanie Patchell
Adviser, Listing Compliance (Perth)

RE: Stonehorse Energy Limited (SHE): Price -Query

Dear Stephanie

I refer to your Price Query letter of 16 September 2020 and respond below:

1. Is SHE 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?

No

2. If the answer to question 1 is “yes”.

- (a) Is SHE relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in SHE’s securities would suggest to ASX that such information may have ceased to be confidential and therefore SHE 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.

N/A

- (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).

N/A

- (c) If an announcement cannot be made immediately, why not and when is it expected that an announcement will be made?

N/A

3. If the answer to question 1 is “no”, is there any other explanation that SHE may have for the recent trading in its securities?

No

4. Please confirm that SHE is complying with the Listing Rules and, in particular, Listing Rule 3.1.

The Company is complying with the Listing Rules and in particular, Listing Rule 3.1.



5. Please confirm that SHE'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 SHE with delegated authority from the board to respond to ASX on disclosure matters.

The Responses have been authorised by the Managing Director and Company Secretary

Kind regards

A handwritten signature in black ink, appearing to be 'J. Stephenson', located below the 'Kind regards' text.

Jay Stephenson
Director and Company Secretary



16 September 2020

Reference: 24466

Mr Jay Stephenson
Company Secretary
Stonehorse Energy Limited

By email: jay.stephenson@foresthouse.com.au

Dear Mr Stephenson

Stonehorse Energy Limited ('SHE'): Price - Query

ASX refers to the following:

- A. The change in the price of SHE's securities from a low of \$0.009 at the close of trade on 15 September 2020 to an intraday high of \$0.013 today, 16 September 2020.
- B. The significant increase in the volume of SHE's securities traded on 16 September 2020.

Request for information

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

1. Is SHE 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 SHE relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in SHE's securities would suggest to ASX that such information may have ceased to be confidential and therefore SHE 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 SHE may have for the recent trading in its securities?
4. Please confirm that SHE is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that SHE'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 SHE 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 **3.45pm WST today, Wednesday 16 September 2020**. 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, SHE'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 SHE 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 SHE'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 SHE's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

In responding to this letter, you should have regard to SHE'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 SHE'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.

Yours sincerely

Stephanie Patchell
Adviser, Listings Compliance (Perth)