



Strategic Elements Ltd

ABN 47 122 437 503

Suite 138 Churchill Ave,
Subiaco WA 6008
Australia

Phone: +61 8 9278 2788

Fax: +61 8 9288 4400

admin@strategicelements.com.au

Vanessa Nevjestic
Adviser, Listings Compliance
ASX
Level 40, Central Park
152-158 St Georges Terrace
Perth WA 6000 (by email)

10 August 2021

Dear Vanessa,

Response to Price and Volume Query Letter 10 August 2021

Strategic Elements Ltd (the "Company") provides this response to your letter regarding changes in the Company's share price, specifically the change in volume and price of the Company's securities which occurred during trading today.

In response to the specific questions in your letter, the Company advises as follows:

1. The Company is not 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. Not applicable.
3. The Company is unaware of any other potential explanation for the recent trading in SOR securities
4. The Company confirms that is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.
5. This response has been authorised and approved by the board of Strategic Elements Ltd.

Yours faithfully,

Matthew Howard
Company Secretary
Strategic Elements Ltd



10 August 2021

Reference: ODIN37838

Mr Matthew Howard
Company Secretary
Strategic Elements Limited
138 Churchill Avenue
Subiaco, Western Australia 6008

By email: matthew@strategicelements.com.au

Dear Mr Howard

Strategic Elements Limited ('SOR'): Price and Volume - Query

ASX refers to the following:

- A. The change in the price of SOR's securities from an intraday low of A\$0.275 to an intraday high of A\$0.340 at the time of writing this letter today.
- B. The significant increase in the volume of SOR's securities traded today.

Request for information

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

1. Is SOR 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 SOR relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in SOR's securities would suggest to ASX that such information may have ceased to be confidential and therefore SOR 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 SOR may have for the recent trading in its securities?
4. Please confirm that SOR is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that SOR'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 SOR 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 **3:45 PM AWST Tuesday, 10 August 2021**. 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, SOR'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 SOR 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 SOR'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 SOR's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

In responding to this letter, you should have regard to SOR'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 SOR'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

Vanessa Nevjestic
Adviser, Listings Compliance (Perth)