



16 February 2022

Belinda Giles
Adviser, Listings Compliance (Perth)
Australian Stock Exchange Limited
Level 40, Central Park,
152-158 St Georges Terrace
Perth WA 6000

Dear Belinda,

RE : Response to ASX Price and Volume Query

WhiteHawk Limited ("WHK" or the "Company") refer to your letter dated 16 February 2022 regarding an ASX Price and Volume Query and respond to your questions as follows:

1. Is WHK 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 WHK relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in WHK's securities would suggest to ASX that such information may have ceased to be confidential and therefore WHK 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", please advise whether there is any other explanation that WHK may have for the recent trading in its securities.

WHK is not aware of the reason for the recent trading in its securities, although notes that the closing price range of its securities over the last three months is between \$0.093 to \$0.14, and so the current trading price referred to in your letter (\$0.115) is not inconsistent with the recent trading history of WHK.

WHK also notes that:



- (a) *WHK is one of only a few cyber risk prevention companies listed on ASX, and is revenue generating;*
- (b) *there has been increased publicity around cyber risks in recent days highlighted by potential Russian actions against Ukraine Government facilities, power, infrastructure and supply chains;*
- (c) *WHK has previously released material information regarding US Government contracts; and*
- (d) *the wider ASX market was trading higher today.*

Any, or all, of these factors could explain the increase in the price during the day today.

4. Please advise whether WHK considers the Information to be information concerning WHK that a reasonable person would expect to have a material effect on the price or value of WHK's securities.

No.

5. If the answer to question 4 is "no", please explain the basis for that view.

The 'Information' (defined in your letter) was first noted to the market on 27 January 2022 in WHK's Quarterly Activities Report for the period ended 31 December 2021 where WHK stated:

"Completed successful Cyber Risk Radar Proof of Concept with global social media company and currently finalizing Master Services Agreement for a Cyber Risk Radar contract for that company starting in first quarter 2022."

The information as set out in that Quarterly Report was considered relevant and as such was disclosed to the market. The subsequent press release made nearly two weeks after that initial disclosure was consistent with WHK's disclosure that it was finalising the Master Services Agreement for services commencing in the first quarter of 2022.

WHK does not consider that there is any material difference from what it announced it would be doing on 27 January 2022 and the Information referred to in the press release.

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

The Company confirms that it is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.

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

The Company confirms that its responses to the questions above have been authorised and approved by an officer of the Company with delegated authority from the board to respond to the ASX on disclosure matters.

Yours sincerely,

Kevin Kye
Company Secretary



16 February 2022

Reference: 47055

Mr Kevin Kye
Company Secretary
Whitehawk Limited

By email

Dear Mr Kye

Whitehawk Limited ('WHK'): Price and volume query

ASX refers to the following:

- A. The change in the price of WHK's securities from a low of \$0.10 yesterday to a high of \$0.115 today.
- B. The significant increase in the volume of WHK's securities traded so far today.
- C. The information published on WHK's website on 10 February 2022 regarding the execution of a Cyber Risk Radar contract comprising an annual subscription worth US\$1,500,000 ('Information').

Request for information

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

1. Is WHK 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 WHK relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in WHK's securities would suggest to ASX that such information may have ceased to be confidential and therefore WHK 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", please advise whether there is any other explanation that WHK may have for the recent trading in its securities.
4. Please advise whether WHK considers the Information to be information concerning WHK that a reasonable person would expect to have a material effect on the price or value of WHK's securities.
5. If the answer to question 4 is "no", please explain the basis for that view.
6. Please confirm that WHK is complying with the Listing Rules and, in particular, Listing Rule 3.1.



7. Please confirm that WHK'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 WHK 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 **1:15 PM AWST on Wednesday, 16 February 2022**.

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, WHK'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 WHK 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 WHK'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 WHK's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

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

Belinda Giles

Adviser, Listings Compliance (Perth)