



12 September 2019

ASX Listings Compliance
Level 40, Central Park
152-158 St Georges Tce
Perth WA 6000

By email: ListingsCompliancePerth@asx.com.au.

Ref: ODIN07005

Attention: Isabelle Andrews

Dear Ms Andrews

Response to ASX Price Query

We refer to your query in relation to the change in the price of Seafarms Group Limited's (**Company**) securities and trading volumes (**ASX Price Query**). We respond to your questions as follows:

- 1. Is SFG 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?**

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. If the answer to question 1 is "yes":**

- (a) Is SFG relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1?**

Not applicable.

- (b) Can an announcement be made immediately?**

Not applicable.

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

Not applicable.

Seafarms Group Limited
ABN: 50 009 317 846

Level 11, 225 St Georges Terrace
Perth WA 6000 Australia
PO Box 7312
Cloisters Square
Perth WA 6850 Australia

T +61 8 9216 5200
F +61 8 9216 5199
E info@seafarms.com.au
W seafarms.com.au

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

The Company notes that on 2 September 2019 it announced a comprehensive market update (“SFG Annual Report Presentation” and “SFG Appendix 4E Annual Report”). Other than the update announcement on 2 September 2019, the Company does not have any other explanation for the recent trading in its securities.

- 4. Please confirm that the Entity is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.**

The Company is in compliance with the Listing Rules, including Listing Rule 3.1.

- 5. Please confirm that SFG’s responses to the questions above have been authorised and approved in accordance with its published continuous disclosure policy or otherwise by its board or an officer of SFG with delegated authority from the board to respond to ASX on disclosure matters.**

The Company’s responses in this letter have been authorised and approved in accordance with its published continuous disclosure policy.

Please do not hesitate to contact me if you require any additional information.

Yours faithfully
Seafarms Group Limited

A handwritten signature in black ink, appearing to be 'IT', with a large loop at the start and a small dot at the end.

Ian Trahar
Chairman



12 September 2019

Reference: ODIN07005

Mr Harley Whitcombe
Company Secretary
Seafarms Group Limited
Level 11 225 St George's Terrace
Perth WA 6000

By email:

Dear Mr Whitcombe

Seafarms Group Limited ('SFG'): Price Query

We note the change in the price of SFG's securities from a low of \$0.078 on 10 September 2019 to a high of \$0.105 today.

We also note the significant increase in the volume of SFG's securities traded from 10 September 2019 to 12 September 2019.

Request for Information

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

1. Is SFG 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 SFG relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in SFG's securities would suggest to ASX that such information may have ceased to be confidential and therefore SFG 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 SFG may have for the recent trading in its securities?
4. Please confirm that SFG is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that SFG'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 SFG 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 **10:40 AM AWST today Thursday, 12 September 2019**. If we do not have your response by then, ASX will likely suspend trading in SFG's securities under Listing Rule 17.3. 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, SFG'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.

ASX reserves the right to release a copy of this letter and your response on the ASX Market Announcements Platform under Listing Rule 18.7A. Accordingly, your response should be in a form suitable for release to the market. 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.

Listing Rules 3.1 and 3.1A

Listing Rule 3.1 requires a listed 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. Exceptions to this requirement are set out in Listing Rule 3.1A. In responding to this letter, you should have regard to SFG'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 SFG'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.

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 SFG'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 may 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 SFG's securities under Listing Rule 17.3.

Enquiries

If you have any queries or concerns about any of the above, please contact me immediately.

Yours sincerely

Isabelle Andrews
Senior Adviser, Listings Compliance (Perth)