



# Market Announcement

13 March 2020

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Attached for the information of the market is ASX's price query letter to Skin Elements Limited (ASX:SKN) dated 6 March 2020 and SKN's response dated 13 March 2020.

ASX's enquiries into the matters dealt with in that correspondence are ongoing.



## Skin Elements Limited ASX ANNOUNCEMENT

ASX CODE:SKN

13 March 2020

Ms Vanessa Nevjestic  
Advisor, Listings Compliance (Perth)  
Australian Stock Exchange

Dear Vanessa

### **Skin Elements Limited (SKN) – Price Query**

Skin Elements Limited (SKN) provides the following response to ASX price query of 6 March 2020:

#### ***Skin Elements Limited ('SKN'): Price Query***

*We note the change in the price of SKN's securities from an intraday low of \$0.012 to an intraday high of \$0.025 today.*

*We also note the significant increase in the volume of SKN's securities traded from today.*

#### **Request for Information**

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

1. *Is SKN 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?*

SKN is not aware of any information concerning it that has not been announced to the market.

2. *If the answer to question 1 is "yes".*
  - (a) *Is SKN relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in SKN's securities would suggest to ASX that such information may have ceased to be confidential and therefore SKN 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?*

See 1. above

Natural Science by Skin Elements

32 Ord Street, West Perth  
Western Australia, 6005  
P 08 6311 1900  
F 08 6311 1999

[www.mcarthurskincare.com](http://www.mcarthurskincare.com)  
[www.soleoorganics.com](http://www.soleoorganics.com)  
[www.skinelementslimited.com](http://www.skinelementslimited.com)

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

SKN notes that included in its cover announcement to the Half Year Report dated 28 February 2020, the Company included a paragraph on new product launch Invisi-Shield skin medical range.

Given the recent global interest for products of this nature SKN will provided clarification of its Invisi-Shield range through an announcement to the market.

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

We confirm that SKN is complying with the Listing Rules and, in particular, Listing Rule 3.1. and there is no information that should be given to ASX about its financial condition under that rule that has not already been released to the market.

5. *Please confirm that SKN’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 SKN with delegated authority from the board to respond to ASX on disclosure matters.*

SKN’s responses to the questions above have been authorised and approved by the Board of Directors in accordance with its published continuous disclosure policy.

Yours sincerely



**Craig Piercy**  
**Company Secretary**



6 March 2020

Reference: ODIN15186

Mr Craig Piercy  
Company Secretary  
Skin Elements Limited  
7/36 Ord Street  
WEST PERTH WA 6005

By email: [craig@senatural.com](mailto:craig@senatural.com)

Dear Mr Piercy

#### **Skin Elements Limited ('SKN'): Price Query**

We note the change in the price of SKN's securities from an intraday low of \$0.012 to an intraday high of \$0.025 today.

We also note the significant increase in the volume of SKN's securities traded from today.

#### **Request for Information**

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

1. Is SKN 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 SKN relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in SKN's securities would suggest to ASX that such information may have ceased to be confidential and therefore SKN 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 SKN may have for the recent trading in its securities?
4. Please confirm that SKN is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that SKN'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 SKN 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 **11:00 AM AWST today Friday, 6 March 2020**. If we do not have your response by then, ASX will likely suspend trading in SKN'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, SKN'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](mailto:ListingsCompliancePerth@asx.com.au). It should not be sent directly to the ASX Market

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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 SKN'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 SKN'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 SKN'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 SKN'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 faithfully

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**Vanessa Nevjestic**  
Adviser, Listings Compliance (Perth)