



# Sacgasco Limited

*ABN 83 114 061 433*

*Unit 14, 210 Bagot Road, Subiaco, WA, 6008.*

*T +61 8 9388 2654 E [info@sacgasco.com](mailto:info@sacgasco.com)*

17 June 2020

Daniel Nicholson  
Adviser, Listings Compliance (Perth)  
ASX Limited  
Level 40, Central Park  
152-158 St George's Terrace Perth WA 6000

Dear Daniel,

**RE: Sacgasco Limited ('SGC'): Price and Volume Query**

We refer to your letter on the above subject matter, dated 17 June 2020. The responses to your questions are below:

1. Is SGC 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":

**Not Applicable**

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

**The Company released an investor presentation on 4 June 2020 and provided an update to shareholders on this same date via webinar. Aside from this presentation, the Company is not aware of any other explanation for the recent trading in its securities.**

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

**We confirm that SGC is complying with the Listing Rules and, in particular, Listing Rule 3.1.**

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

**The responses to the above questions have been authorised and approved by the Board of Sargasco Limited under the published continuous disclosure policy.**

Yours sincerely,



**Jordan McArthur**  
*Company Secretary*



17 June 2020

Reference: 19583

Mr Jordan McArthur  
Company Secretary  
Sacgasco Limited

By email

Dear Mr McArthur

### **Sacgasco Limited ('SGC'): Price and Volume Query**

We note the change in the price of SGC's securities from a low of \$0.017 on Wednesday, 10 June 2020, to an intraday high of \$0.029 at the time of writing, today.

We also note the significant increase in the volume of SGC's securities traded from 10 June 2020 to 17 June 2020.

### **Request for Information**

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

1. Is SGC 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 SGC relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in SGC's securities would suggest to ASX that such information may have ceased to be confidential and therefore SGC 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 SGC may have for the recent trading in its securities?
4. Please confirm that SGC is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that SGC'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 SGC 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 **1:00 PM AWST today Wednesday, 17 June 2020**. If we do not have your response by then, ASX will likely suspend trading in SGC'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

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not fall within the exceptions mentioned in Listing Rule 3.1A, SGC'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 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 SGC'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 SGC'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 SGC'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 SGC's securities under Listing Rule 17.3.

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**Enquiries**

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

Yours faithfully

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**Daniel Nicholson**  
Adviser, Listings Compliance (Perth)