

11 November 2014

Mr Jeremy Newman  
Issuers (Perth)  
Australian Securities Exchange  
Level 8 Exchange Plaza  
2 The Esplanade  
PERTH WA 6000

Dear Mr Newman

### Response to ASX Price Query

We refer to your letter dated 11 November 2014 querying the change in trading price of WSR shares from a closing price of \$0.038 on 10 November 2014 to an intra-day high of \$0.046 today, 11 November 2014 ("Letter").

In response to your questions outlined in the Letter, we provide the following information:

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 the Company's securities.
2. Not applicable.
3. As the Company announced on 29 October 2014 and in the recent quarterly report on 31 October 2014, the Company has exercised its option to acquire Spookfish Pty Ltd ("Spookfish") and Geospatial Investments Pty Ltd as well as receiving firm commitments to raise approximately \$4 million pursuant to a re-compliance prospectus. The raising is at an issue price of \$0.035 each share with one free attaching unlisted option (\$0.05; 30 November 2018) for each two shares issued.

The capital raising is subject to successful completion of the acquisition, WSR re-complying with chapters 1 and 2 of the Listing Rules and completion of due diligence including full-scale testing of the Spookfish Technology Demonstrator.

The Spookfish Technology Demonstrator, which is anticipated to be completed prior to the shareholder meeting, will test all aspects of the revolutionary Spookfish Technology including camera systems, data storage, processing, delivery and flight operations which will then be scaled up for the Spookfish commercial offering.

A progress update on the Spookfish Technology Demonstrator has been released to the market today, and the Company is on track for the full-scale testing of the



## ASX ANNOUNCEMENT

### Board & Management:

Steve Anastos  
Chairman

Jason Marinko  
Director

Shannon Robinson  
Director | Company Secretary

**Issued Capital:**  
363 million shares

**Registered Office:**  
Level 1, Suite 5, The Business Centre  
55 Salvado Road  
Subiaco WA 6008

**Postal Address:**  
PO Box 131  
Subiaco WA 6904

**Contact Details:**  
T: +61 8 9380 6789  
F: +61 8 9380 6761  
E: [admin@whitestarresources.com.au](mailto:admin@whitestarresources.com.au)

**Website**  
[www.whitestarresources.com.au](http://www.whitestarresources.com.au)

**ASX Code:**  
WSR

**Share Registry:**  
Advanced Share Registry  
110 Stirling Highway  
Nedlands WA 6009

T: +61 8 9389 8033  
F: +61 8 9262 3723

Spookfish Technology Demonstrator later this month.

4. The Company confirms it is in compliance with the Listing Rules, in particular 3.1.

Please do not hesitate to contact me if further information is required.

Yours sincerely

A handwritten signature in black ink, appearing to read "J. Marinko", is placed above the printed name.

Jason Marinko  
Executive Director



ASX Compliance Pty Ltd  
ABN 26 087 780 489  
Level 40, Central Park  
152-158 St Georges Terrace  
Perth WA 6000

GPO Box D187  
Perth WA 6840

Telephone 61 8 9224 0000  
[www.asx.com.au](http://www.asx.com.au)

11 November 2014

Shannon Robinson  
Company Secretary  
Whitestar Resources Limited

Dear Shannon

**Whitestar Resources Limited (the “Entity”) – Price and Volume Query**

We have noted a change in the price of the Entity’s securities from a close of \$0.038 yesterday to an intra-day high of \$0.046 today, 11 November 2014. We have also noted an increase in the volume of trading in the Entity’s securities over this period.

In light of the price change and increase in volume, ASX asks you to respond separately to each of the following questions:

1. Is the Entity 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 the Entity relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1?

Please note that the recent trading in the Entity’s securities would suggest to ASX that such information may have ceased to be confidential and therefore the Entity 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 the Entity may have 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.

## **When and where to send your response**

This request is made under, and in accordance with, Listing Rule 18.7. Your response is required as soon as reasonably possible and, in any event, by not later than **1:30 pm WST, today, 11 November 2014**. If we do not have your response by then, ASX will have no choice but to consider suspending trading in the Entity'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, the Entity'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 **jeremy.newman@asx.com.au** and **tradinghaltspert@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 Rule 3.1**

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.

The obligation of the Entity to disclose information under Listing Rules 3.1 and 3.1A is not confined to, nor is it necessarily satisfied by, answering the questions set out in this letter.

In responding to this letter, you should have regard to the Entity's obligations under Listing Rules 3.1 and 3.1A and also to Guidance Note 8 *Continuous Disclosure: Listing Rules 3.1 – 3.1B*.

## **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 the Entity'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*.

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

Yours sincerely

*[Sent electronically without signature]*

Jeremy Newman

**Adviser, Listings Compliance (Perth)**