



23 February 2024

Ben Dawson
Adviser, Listing Compliance
Australian Stock Exchange Limited
Level 40, Central Park
152-158 St Georges Terrace
Perth WA 6000

By email : ben.dawson@asx.com.au
listingscomplianceperth@asx.com.au

Dear Ben,

RE : Response to ASX Price and Volume Query

WhiteHawk Limited (“WHK” or the “Company”) refer to your letter dated 23 February 2024 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.

Not Applicable

(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).

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

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

The Company is not aware of the reason for the recent trading in its securities, although notes that number of S&P 500 companies in the United States of America with exposure to Artificial Intelligence (AI) has climbed to a new high in the last twenty four hours, over investor sentiments on worldwide artificial intelligence investment boom.

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WHITEHAWK

The Company is the first global online AI based cyber security exchange, with automated and scalable Cyber Risk Assessment, Saas, and Platform as a Service (Paas) product lines that are tailored for clients of all sizes. The Company announced AI based Cyber Risk Contract with Top 5 Global Social Media Company on 11 December 2023 and Australian investors seeking to capitalise on growth potential of the AI market may have attributed price and volume increase.

4. 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.

5. 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 WhiteHawk's response to the questions above have been authorised and approved by an officer of the Company with delegated authority from the board to respond to ASX on disclosure matters.

Yours sincerely,

Kevin Kye
Company Secretary

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23 February 2024

Reference: ODIN89165

Mr Kevin Kye
Company Secretary
WhiteHawk Limited

By email: kevin.kye@hskasset.com

Dear Mr Kevin 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 \$0.012 at close of trade on 22 February 2024 to an intraday high of \$0.021 today.
- B. The significant increase in the volume of WHK's securities traded today.

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", is there any other explanation that WHK may have for the recent trading in its securities?
4. Please confirm that WHK is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. 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 **11.30 AM AWST Friday, 23 February 2024**. 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

ASX reserves the right to release all or any part of this letter, your reply and any other related correspondence between us to the market under Listing Rule 18.7A.

Yours faithfully

ASX Compliance