



16 April 2018

Ms Sandra Wutete
Senior Adviser
Listings Compliance (Perth)
Level 40, Central Park
152-158 St George's Terrace
Perth WA 6000

By email: sandra.wutete@asx.com.au
TradingHaltsPerth@asx.com.au

Dear Ms Wutete,

STERLING PLANTATIONS LIMITED (the "Company"): PRICE QUERY

The Company refers to the price query received from the ASX on 16 April 2018 at 1.16pm WST.

The Company provides its responses as follows:

- A. The Company is not aware of any information that has not been announced to the market which could explain the recent trading in its securities.
- B. Not applicable.
- C. The Company is not aware of any other explanation which could explain the recent trading in its securities.
- D. The Company confirms that it is in compliance with the Listing Rules and, in particular Listing Rule 3.1.
- E. The Company confirms that the responses provided above in paragraphs A to D have been authorised and approved by its board.

Yours faithfully

A handwritten signature in black ink, appearing to read "Shaun Menezes".

Shaun Menezes
Company Secretary



16 April 2018

Mr Shaun Menezes

Company Secretary
Sterling Plantations Limited

By email: shaun.menezes@westnet.com.au

Dear Mr Menezes

Sterling Plantations Limited (the “Entity”): price query

We note the change in the price of the Entity’s securities from a closing price of \$0.01 on Friday, 13 April 2018 to an intra-day high at the time of writing of \$0.10 today, Monday 16 April 2018.

We also note the significant increase in the volume of the Entity’s securities traded today.

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

- A. 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?
- B. 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?
- C. 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?
- D. Please confirm that the Entity is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.
- E. Please confirm that the Entity’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 the Entity 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, 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 half an hour before the start of trading (i.e. before 7:30 am WST) on Tuesday, 17 April 2018**. 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 copying in TradingHaltsPerth@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 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*.

It should be noted that the Entity’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 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.

Kind regards

[Sent electronically without signature]

Sandra Wutete

Senior Adviser, Listings Compliance (Perth)

T 08 9224 0000





16 April 2018

Mr Shaun Menezes

Company Secretary
Sterling Plantations Limited

By email: shaun.menezes@westnet.com.au

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