



**SWW Energy Limited**

18 September 2013

Mr Sebastian Bednarczyk  
Senior Adviser  
Listings, Compliance  
Level 8, Exchange Plaza  
2 The Esplanade  
PERTH WA 6000

Dear Sebastian,

**Re: SWW Energy Limited (the “Company”) Price and Volume Query**

I refer to your correspondence dated 17 September 2013 regarding the change in the price of the securities of the Company from a closing of \$0.002 on 16 September 2013 to an intra-day high of \$0.014 yesterday, and respond as follows:

1. *Is the Entity aware of any information concerning it that has not been announced to the market which, if known by the some in the market, could explain the recent trading in its securities?*

No.

2. *If the answer to question 1 is yes:*

N/A.

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?*

On 13 September 2013 the Company advised it had appointed Mr Stewart Elliott, Chairman and CEO of ASX listed Energy World Limited (ASX:EWC) to the Board of SWW Energy. In addition the Company advised that Mr Brian Allen, Mr Graham Elliott and Mr Stuart Foster had joined the Board.

The Company further advised it had placed 58,439,868 ordinary shares to raise approximately \$292,199 to Swan Capital Limited, an entity associated with Messrs. Stewart Elliott, Brian Allen and Graham Elliott. An ASIC form 604 Change in Substantial Shareholder notice was lodged this morning advising that Swan Capital Limited has acquired a further 30,719,882 shares in the Company bringing its total interest in the Company to 19.90%. The Board submits that the remaining 71,048,335 shares traded in the Company was borne through market interest in the Company’s new Board and prospects.

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Tel:+618 9486 4036; Fax: +618 9486 4799



**SWW Energy Limited**

4. *Please confirm that the Entity is in compliance 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.

Please do not hesitate to contact me with any queries relating to this matter.

Yours sincerely,

Matthew Foy  
Company Secretary  
SWW Energy Ltd  
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17 September 2013

Matthew Foy  
Company Secretary  
SWW Energy Limited  
1139 Hay Street  
WEST PERTH WA 6005

By Email: [matt.foy@minervacorporate.com.au](mailto:matt.foy@minervacorporate.com.au)

Dear Matthew

### **SWW Energy Limited (the "Entity")**

#### **PRICE AND VOLUME QUERY**

We have noted a change in the price of the Entity's securities from a close of \$0.002 on 16 September 2013 to an intra-day high of \$0.014 today, 17 September 2013. 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 half an hour **before the start of trading (i.e. before 7:30 a.m. WST) on 18 September 2013**. 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 on [tradinghaltspert@asx.com.au](mailto:tradinghaltspert@asx.com.au) or by facsimile to 08 9221 2020. 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]*

Sebastian Bednarczyk  
**Senior Adviser, Listings Compliance (Perth)**