

Mr John Johansson
Adviser, Listings Compliance (Melbourne)
Australian Stock Exchange
Level 4, North Tower, Rialto, 525 Collins Street
Melbourne VIC 3000

23 December 2016

Dear John

Price Query – Shaver Shop Group Limited (SSG)

I refer to your letter dated 22 December 2016 and provide the following responses to the questions you have raised:

1. In response to Question 1, SSG notes that on 22 December 2016 it became aware of a market rumour that one of its significant shareholders had lost an investment mandate and that this could, in turn, be driving the actual or anticipated forced realisation of a significant number of SSG shares. SSG has been unable to verify the veracity of this rumour.

In reference to question 1a), SSG refers to its Trading Update ASX Announcement dated 23 December 2016.

2. In response to Question 2, the answer is “not applicable”.
3. In response to Question 3, SSG is not aware of any other explanation for the recent trading in its securities.
4. In response to Question 4, the answer is “yes”. SSG is in compliance with the listing rules and in particular, Listing Rule 3.1.
5. In response to Question 5, the responses to the questions have been authorised and approved by the Board of SSG.

Yours sincerely



Lawrence R Hamson
Chief Financial Officer and Company Secretary
Shaver Shop Group Limited



22 December 2016

Mr Larry Hamson
CFO and Company Secretary
Shaver Shop Group Limited
Level 1, Chadstone Tower One
1341 Dandenong Road
Chadstone VIC 3148

By email: larryh@shavershop.com.au

Dear Mr Hamson

Shaver Shop Group Limited (“SSG”): price query

We note the change in the price of SSG’s securities from a high of \$1.03 on 12 December 2016 to an intra low of \$0.76 today.

We also note the significant increase in the volume of SSG’s securities traded today and on 20 December 2016.

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

1. Is SSG 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?

In responding to this question, please consider in particular whether SSG is aware of any information that its earnings for the 12 month period ending on 31 December 2016:

- a) are likely to differ materially (downwards or upwards) from any earnings guidance it has given for the period; or
- b) if SSG has not given any earnings guidance for the period, are otherwise likely to come as a surprise to the market (by reference to analyst forecasts for the period or, if SSG is not covered by analysts, its earnings for the prior corresponding period)?

2. If the answer to question 1 is “yes”:

- a) Is SSG relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1?

Please note that the recent trading in SSG’s securities would suggest to ASX that such information may have ceased to be confidential and therefore SSG 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 SSG may have for the recent trading in its securities?
4. Please confirm that SSG is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that SSG’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 SSG 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 (ie before 9.30 am AEDT on 23 December 2016. If we do not have your response by then, ASX will have no choice but to consider suspending trading in SSG’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, SSG’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 john.johansson@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 SSG’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 SSG’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 SSG’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]

John Johansson
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