



EMPEROR ENERGY
L I M I T E D

2 February 2021

Lin Kang
Adviser, Listing Compliance (Sydney)
ASX Limited
20 Bridge Street
Sydney NSW 2000

RE: Price Query, Reference ODIN30338

Dear Lin,

Emperor Energy Limited (“EMP”) refers to your letter dated 2 February 2021 and provides the following response to your queries:

1. Is EMP 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 EMP relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in EMP’s securities would suggest to ASX that such information may have ceased to be confidential and therefore EMP 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?

Not Applicable.



EMPEROR ENERGY
L I M I T E D

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

The company believes that the rising Global LNG gas price may be a contributing factor to the price change and increase in volume in the securities of the Company. In addition, on 30 December 2020 the company announced that it had been granted a 30-month extension on the Vic/p47 permit containing the Judith Gas Field. This extension has removed any permit risk that the company may have been exposed too.

4. Please confirm that EMP is complying with the Listing Rules and, in particular, Listing Rule 3.1.

We confirm that EMP is complying with the all Listing Rules including Listing Rule 3.1.

5. Please confirm that EMP’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 EMP with delegated authority from the board to response to the ASX disclosure matters.

This announcement has been authorised for release by the board of directors.

Yours faithfully

Carl Dumbrell

Company Secretary

Ph +61 402 277 282

carl@emperorenergy.com.au



2 February 2021

Reference: ODIN30338

Mr Carl Dumbrell
Partner
CD & TL Accountants & Advisors
Level 21
201 Sussex St
Sydney NSW 2000

By email

Dear Mr Dumbrell

Emperor Energy Limited ('EMP'): Price - Query

ASX refers to the following:

- A. The change in the price of EMP's securities from a close of \$0.029 on 1 February 2021 to an intraday high of \$0.048 at the time of this letter.
- B. The significant increase in the volume of EMP's securities traded today.

Request for information

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

1. Is EMP 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 EMP relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in EMP's securities would suggest to ASX that such information may have ceased to be confidential and therefore EMP 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 EMP may have for the recent trading in its securities?
4. Please confirm that EMP is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that EMP'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 EMP 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 **4 PM AEDT Tuesday, 2 February 2021**. 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, EMP'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 EMP to request a trading halt immediately.

Your response should be sent to me by e-mail at **ListingsComplianceSydney@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 EMP'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 EMP's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

In responding to this letter, you should have regard to EMP'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 EMP'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

We reserve the right to release a copy of this letter, your reply and any other related correspondence between us to the market under Listing Rule 18.7A.

Questions

If you have any questions in relation to the above, please do not hesitate to contact me.

Kind regards

Lin Kang
Adviser, Listings Compliance (Sydney)