

10 August 2020

Ms Vanessa Nevjestic
Adviser, ASX Listings Compliance (Perth)

By Email

Dear Ms Nevjestic

Shekel Brainweigh Ltd ("SBW") – ASX Price and Volume Query

We refer to ASX's letter dated 10 August 2020 regarding the recent change in the price, and an increase in the volume of trading, in the Company's securities ("**Letter**").

Responses to Specific Questions in the Letter

1. Is SBW 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 SBW is aware of any information that its earnings for the 6 month period ending on 30 June 2020:

- (a) are likely to differ materially (downwards or upwards) from any earnings guidance it has given for the period; or
- (b) if SBW 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 SBW is not covered by analysts, its earnings for the prior corresponding period)?

No. SBW has not provided any earnings guidance and is not aware of any information that its earnings for the 6 month period ending 30 June 2020 will come as a surprise to the market based on analyst forecasts for the period or earnings for the prior corresponding period.

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

- a) Is SBW relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in SBW's securities would suggest to ASX that such information may have ceased to be confidential and therefore SBW may no longer be able to rely on Listing Rule 3.1A. Accordingly, if the answers to this question is "yes", you need to contact us immediately to discuss the situation.

Not applicable.

- b) Can the 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 SBW may have for the recent trading in its securities.

The Company is not aware of any information.

4. Please confirm that SBW 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.

5. Please confirm that SBW'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 SBW with delegated authority from the board to respond to ASX on disclosure matters.

The Company confirms the responses in this letter are made by the Chief Financial Officer, being an officer of SBW with delegated authority from the board to respond to ASX on disclosure matters.

Barak Nir
Chief Financial Officer



10 August 2020

Reference: ODIN22215

Ms Sinead Teague
Company Secretary
Shekel Brainweigh Ltd
Level 1, 38 Rowland Street
SUBIACO WA 6008

By email: sinead.teague@automicgroup.com.au

Dear Ms Teague

Shekel Brainweigh Ltd ('SBW'): Price and Volume Query

ASX refers to the following:

- A. The change in the price of SBW's securities from an intraday low of \$0.130 on 7 August 2020 to an intraday high of \$0.215 today.
- B. The significant increase in the volume of SBW's securities traded today.

Request for information

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

- 1. Is SBW 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 SBW is aware of any information that its earnings for the 6 month period ending on 30 June 2020:

- (a) are likely to differ materially (downwards or upwards) from any earnings guidance it has given for the period; or
 - (b) if SBW 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 SBW is not covered by analysts, its earnings for the prior corresponding period)?
- 2. If the answer to question 1 is "yes".
 - (a) Is SBW relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in SBW's securities would suggest to ASX that such information may have ceased to be confidential and therefore SBW 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 SBW may have for the recent trading in its securities?

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4. Please confirm that SBW is complying with the Listing Rules and, in particular, Listing Rule 3.1.
 5. Please confirm that SBW'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 SBW 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 **13.15 PM AWST Monday, 10 August 2020**. 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, SBW'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 SBW 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 SBW'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 SBW's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

In responding to this letter, you should have regard to SBW'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 SBW'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.

Yours sincerely

Vanessa Nevjestic
Adviser, Listings Compliance (Perth)