

9 April 2024

ASX Compliance Pty Ltd
Level 40, Central Park
152-158 St Georges Terrace Perth WA 6000

RE: Streamplay Studio Limited ('SP8'): Trading during a closed period

In reference to your letter dated 9 April 2015, **Streamplay Studio Limited's** ("Streamplay" or the "Company") (ASX: SP8) response to your queries in number order is as follows:

1. Why did the Appendix 3Y state in Part 3 that no interests in SP8's securities were traded during the Closed Period?

The Blackout Period in the Company's Securities Trading Policy states: "*Restricted Persons must not trade in Company Securities in the period between the close of books and 24 hours immediately following the release of the Company's half year and annual financial accounts.*". Due to its acquisition of Noodlecake, the Company did not 'close the books' for the half year until 28 February 2025 meaning the trading did not occur in a Blackout Period as defined by the Company.

2. When did SP8 first become aware of the Transaction that was notified in the Appendix 3Y?

Friday 21 March 2025.

3. Did Mr Privitera notify the Chairman of the Board in writing of his intention to trade? If not, why not?

Yes.

4. Did the Chairman of the Board provide prior written clearance to Mr Privitera to trade during the Closed Period? If so, please provide a copy of the written communication (not for release to the market). If not, why not?

The trade did not occur during a Blackout Period as defined by the Company.

5. Did Mr Privitera breach SP8's Trading Policy?

No. As outlined in the announcement of 24 March 2025, the late lodgement was due to an administrative oversight.

6. If the answer to question 5 is "yes", please explain what disciplinary or remedial action is the board of SP8 proposing to take in relation to the apparent breach of SP8's Trading Policy?

Not applicable.



7. If the answer to question 5 is “no”, please explain why the board of SP8 has taken the view that Mr Privitera has not breached SP8’s Trading Policy.

Refer to question 1.

8. Please explain what arrangements SP8 has in place with its directors to ensure that it is able to meet its disclosure obligations under Listing Rule 3.19A.

The Company’s Corporate Governance Policies are available on the Streamplay website in particular its Continuous Disclosure Policy and Securities trading policy.

Noting that ASX and the Company have different interpretations of the definition of Blackout Periods within the Company’s Securities trading policy, the Company will undertake a review of the policy and amend it to remove any ambiguity in the future.

9. Please confirm that SP8 is complying with the Listing Rules and, in particular, Listing Rule 3.1.

Confirmed.

10. Please confirm that SP8’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 SP8 with delegated authority from the board to respond to ASX on disclosure matters.

Confirmed.

Yours sincerely,

Derek Hall
Company Secretary
Streamplay Studio Limited

About Streamplay Studio

Streamplay Studio Limited (ASX:SP8) is a leading provider of competitive casual gaming and eSports technology, music streaming services, and telco value-added services. The company offers a diverse range of entertainment solutions for its users, including the ability to stream and play games, music, and access various telco services all in one place. Streamplay continues to innovate and expand its offerings to meet the ever-changing needs of its partners and customers.

More information: www.Streamplay.studio





9 April 2025

Reference: ODIN107503

Mr Derek Hall
Company secretary
Streamplay Studio Limited
Level 5, 126-130 Phillip Street
Sydney, New South Wales 2000

By email: derek@hallmarkadvisory.com.au

Dear Mr Hall

Streamplay Studio Limited ('SP8'): Trading during a closed period

ASX refers to the following:

- A. The announcement by SP8 entitled 'Appendix 3Y – Late Lodgement Notice' lodged on the ASX Market Announcements Platform ('MAP') on 24 March 2025 for Mr Paolo Privitera (the 'Appendix 3Y'). The Appendix 3Y related to trading in SP8's securities and relevantly disclosed that:
- (i) The on-market purchase of 2,050,000 shares in SP8 (the 'Shares') occurred on 19 February 2025 and 21 March 2025 (the 'Transaction'); and
 - (ii) The Shares were not traded during a closed period under SP8's trading policy.
- B. SP8's trading policy (the 'Trading Policy') which is available on SP8's website and which states at section 5 'Blackout periods', amongst other things, the following:

*"In addition to the prohibitions on insider trading set out in the Corporations Act, Restricted Persons must not trade in Company Securities in the period between the close of books and 24 hours immediately following the release of the Company's half year and annual financial accounts (**Blackout Periods**), unless the circumstances are exceptional and the procedure for prior written clearance described in section 7 has been met.*

*In addition to the prohibitions on insider trading set out in the Corporations Act, Restricted Persons must not trade in Company Securities within any period imposed by the Board from time to time, for example because the Company is considering matters that would require disclosure to the market but for Listing Rule 3.1A (**Additional Period**), unless the circumstances are exceptional and the procedure for prior written clearance described in section 7 has been met. This prohibition is in addition to the Blackout Periods. The Blackout Periods and the Additional Period are together referred to as a **Prohibited Period** in this policy. Restricted Persons must not disclose to anyone that an Additional Period is in effect.*

Please note that even if it is outside a Prohibited Period, Restricted Persons must not trade in the Company's Securities if they are in possession of Inside Information."

ASX notes the following:

1. SP8's Appendix 4D and half year report for the period ended 31 December 2024 were released on MAP on 28 February 2025 at 12:23:18 p.m. AEDT.
2. SP8's closed period commenced on 1 January 2025 and ended on 3 March 2025 (the 'Closed Period').
3. The Transaction would appear to have taken place during the Closed Period. This is despite SP8 stating in Part 3 of the Appendix 3Y that no interests in SP8's securities were traded during the Closed Period.

Request for information

Having regard to the above, and pursuant to Listing Rule 18.7, ASX asks SP8 to respond separately to each of the following questions.

1. Why did the Appendix 3Y state in Part 3 that no interests in SP8's securities were traded during the Closed Period?
2. When did SP8 first become aware of the Transaction that was notified in the Appendix 3Y?
3. Did Mr Privitera notify the Chairman of the Board in writing of his intention to trade? If not, why not?
4. Did the Chairman of the Board provide prior written clearance to Mr Privitera to trade during the Closed Period? If so, please provide a copy of the written communication (not for release to the market). If not, why not?
5. Did Mr Privitera breach SP8's Trading Policy?
6. If the answer to question 5 is "yes", please explain what disciplinary or remedial action is the board of SP8 proposing to take in relation to the apparent breach of SP8's Trading Policy?
7. If the answer to question 5 is "no", please explain why the board of SP8 has taken the view that Mr Privitera has not breached SP8's Trading Policy.
8. Please explain what arrangements SP8 has in place with its directors to ensure that it is able to meet its disclosure obligations under Listing Rule 3.19A.
9. Please confirm that SP8 is complying with the Listing Rules and, in particular, Listing Rule 3.1.
10. Please confirm that SP8'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 SP8 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 **09:00 AM AWST Tuesday, 15 April 2025**. 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, SP8'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 SP8 to request a trading halt immediately.

Your response should be sent by e-mail to ListingsCompliancePerth@asx.com.au. It should not be sent directly to the ASX Market Announcements Office. This is to allow ASX 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.

Suspension

If you do not respond to this letter by the time specified above, ASX may suspend trading in SP8's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

In responding to this letter, you should have regard to SP8'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 SP8'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

ASX reserves the right to release all or any part of this letter, your reply and any other related correspondence between us to the market under Listing Rule 18.7A. The usual course is for the correspondence to be released to the market.

Yours sincerely

ASX Compliance