

Suite 302
93-95 Pacific Highway
NORTH SYDNEY
NSW, 2060
AUSTRALIA

ASX: BUY
ABN: 82 090 625 353

TEL: 61 (2) 9299.2007
FAX: 61 (2) 9299.7300
EMAIL:
corporate@bountyoil.com



18 June 2020

Ms Melissa Lim
Advisor, Listings Compliance (Sydney)
ASX Limited
GPO Box H224
AUSTRALIA SQUARE NSW 1215

Dear Ms Lim

Re: Bounty Oil & Gas N.L. ("BUY") – ASX Price/Volume Query 18 June 2020.

We refer to your letter of 18 June 2020.


We provide answers by reference to the paragraph numbers in your letter.

1. No.
2. Not applicable.
3. On 18 June 2020 Bounty was first informed of an ASX Release by BPH Energy (ASX code: BPH) of which it had no prior notice referable to Petroleum Exploration Permit 11 (PEP 11). Bounty therefore released an announcement to update the market on this matter of PEP 11.
4. We confirm that the company is in compliance with the listing rules and, in particular, listing rule 3.1.
5. Bounty confirms the responses in this letter are made by the CEO an officer with delegated authority to respond to disclosure matters and queries.

Please advise any other matters.

Yours faithfully

BOUNTY OIL & GAS N.L.


Philip F. Kelso
CEO



18 June 2020

Reference: 19614

Mr Sachin Saraf
Company Secretary
Bounty Oil & Gas NL
Suite 302 93-95 Pacific Highway
North Sydney NSW 2060

By email

Dear Mr Saraf

Bounty Oil & Gas NL ('BUY'): Price Query

We note the change in the price of BUY's securities from a low of \$0.012 to a high of \$0.017 in the last few days.

We also note the significant increase in the volume of BUY's securities traded from 15 June 2020 to 18 June 2020.

Request for Information

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

1. Is BUY 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 BUY relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in BUY's securities would suggest to ASX that such information may have ceased to be confidential and therefore BUY 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 BUY may have for the recent trading in its securities?
4. Please confirm that BUY is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that BUY'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 BUY 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 **2:00 PM AEST today Thursday, 18 June 2020**. If we do not have your response by then, ASX will likely suspend trading in BUY'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, BUY'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 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.

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 BUY'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 BUY'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 BUY'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*.

Suspension

If you are unable to respond to this letter by the time specified above ASX will likely suspend trading in BUY's securities under Listing Rule 17.3.

Enquiries

If you have any queries or concerns about any of the above, please contact me immediately.

Kind regards

Melissa Lim
Adviser, Listings Compliance (Sydney)