

17 August 2020

Mr Corey Lian  
Adviser, Listings Compliance (Sydney)  
ASX  
Exchange Centre  
20 Bridge Street  
SYDNEY NSW 2000

By email: [ListingsComplianceSydney@asx.com.au](mailto:ListingsComplianceSydney@asx.com.au)

Dear Sir

**RE: Bionomics Limited ('BNO'): Price – Query**

We refer to your letter of today whereby the ASX refers to the following:

- A. The change in the price of BNO's securities from a low of \$0.083 to a high of \$0.115 in the last few days.
- B. The significant increase in the volume of BNO's securities traded on 14 August 2020 and 17 August 2020;

and in light of this, the ASX asks and BNO responds to each of the following questions respectively as set out below.

1. **Is BNO 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 BNO is aware of any information that its earnings for the 12 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 BNO 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 BNO is not covered by analysts, its earnings for the prior corresponding period)?**

No.

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

**(a) Is BNO relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in BNO's securities would suggest to ASX that such information may have ceased to be confidential and therefore BNO 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.

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

No.

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

Confirmed.

5. **Please confirm that BNO’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 BNO with delegated authority from the board to respond to ASX on disclosure matters.**

BNO confirms that the above responses have been authorised and approved by officers of BNO with delegated authority from the board to respond to ASX on disclosure matters.

Yours Faithfully,



Jack Moschakis  
Legal Counsel & Company Secretary



17 August 2020

Reference: 22542

Mr Jack Moschakis  
Legal Counsel & Company Secretary  
Bionomics Limited  
31 Dagleish Street  
Thebarton SA 5031

By email:

Dear Mr Moschakis

**Bionomics Limited ('BNO'): Price - Query**

ASX refers to the following:

- A. The change in the price of BNO's securities from a low of \$0.083 to a high of \$0.115 in the last few days.
- B. The significant increase in the volume of BNO's securities traded on 14 August 2020 and 17 August 2020.

**Request for information**

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

- 1. Is BNO 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 BNO is aware of any information that its earnings for the 12 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 BNO 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 BNO is not covered by analysts, its earnings for the prior corresponding period)?
- 2. If the answer to question 1 is "yes".
  - (a) Is BNO relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in BNO's securities would suggest to ASX that such information may have ceased to be confidential and therefore BNO 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 BNO may have for the recent trading in its securities?

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- Please confirm that BNO is complying with the Listing Rules and, in particular, Listing Rule 3.1.
  - Please confirm that BNO'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 BNO 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 **2:30 PM AEST Monday, 17 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, BNO'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 BNO 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 BNO'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 BNO's securities under Listing Rule 17.3.

#### **Listing Rules 3.1 and 3.1A**

In responding to this letter, you should have regard to BNO'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 BNO'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**

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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

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**Corey Lian**  
Adviser, Listings Compliance (Sydney)