

9 March 2023

Lisa Bahn
Senior Advisor, Listings Compliance
ASX Compliance Pty Limited
20 Bridge Street, Sydney, NSW 2000

By email only

Dear Lisa,

BIONOMICS LIMITED (ASX:BNO) (**COMPANY** or **BIONOMICS**) – RESPONSE TO PRICE AND VOLUME QUERY

We refer to your letter dated 8 March 2023 with respect to the ASX price and volume query and respond as follows.

- 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?**

Yes, at the time of receipt of the letter from ASX, Bionomics was aware of information concerning it that has not been announced, which, if known by some in the market, could explain the recent trading in its securities.

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.**

Not applicable – see our response to question 1(b) below.

- (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).**

Yes. Please see the announcements lodged on the ASX platform today titled “Bionomics Reports Promising Update on Analysis from PREVAIL Phase 2 Study of BNC210 Social Anxiety Disorder (SAD)” and “PREVAIL Data Disclosure Presentation”.

- (c) If an announcement cannot be made immediately, why not and when is it expected that an announcement will be made?**

Not applicable – see our response to question 1(b) above.

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

The answer to questions 1 is “yes” – therefore not applicable.

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

The Company confirms that it is complying with the Listing Rules and, in particular, Listing Rule 3.1.

- 4. 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.**

The Company confirms that the responses above have been approved by the Company Secretary under the Company’s published disclosure policy.

If you have any further questions, please do not hesitate to contact me.

Yours Sincerely,

Suzanne Irwin Company
Secretary
CoSec@bionomics.com.au



8 March 2023

Reference: 70017

Ms Suzanne Irwin
Company Secretary
Bionomics Limited
200 Greenhill Road
Eastwood SA 5063

Dear Ms Irwin

Bionomics Limited ('BNO'): Price Query

ASX refers to the following:

- A. The change in the price of BNO's securities from a low of \$0.032 to a high of \$0.037 on 8 March 2023.
- B. The significant increase in the volume of BNO's securities traded today 8 March 2023.

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?

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?
2. If the answer to question 1 is "no", is there any other explanation that BNO may have for the recent trading in its securities?
 3. Please confirm that BNO is complying with the Listing Rules and, in particular, Listing Rule 3.1.
 4. 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 **2.00 PM AEDT Thursday, 9 March 2023**. 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

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

[Lisa Banh](#) (Senior Adviser, Listings Compliance)