



23 June 2016

Ms Sandra Wutete
Senior Adviser, Listings Compliance
ASX Compliance Pty Ltd
Level 40
Central Park
152-158 St George's Terrace
Perth WA 6000

Dear Sandra,

Response to ASX price and volume query

In response to your letter of 20 June 2016:

1. BGD Corporation Ltd (ASX: **BGD**) (the **Company**) is aware of information concerning 5 confidential and incomplete potential acquisitions (**Potential Transaction**) it is considering that prior to today's announcement had not been announced to the market, and which if known by someone in the market, could explain the recent trading of its securities.
2. Due to the incomplete and confidential nature of the Potential Transaction, the Company has been relying on Listing Rule 3.1A as the basis on which it does not need to disclose this information to the market.

On 7 June the Company made a submission to the ASX for in-principle advice on how it was likely to apply Listing Rules 11.1.1 to 11.1.3 if the Company proceeds with the Potential Transaction. Following unusual trading on Friday that may have been affected by the existence of the Potential Transaction, the Company was not in a position to make an announcement to the market until the ASX had made a determination in respect of its submission. Accordingly, the Company requested a trading halt until such time as it was in a position to make a formal announcement.

Following receipt of the ASX's response on 22 June 2016 the Company today released further information about the Potential Transaction. Please refer to this announcement for further information.

3. Not applicable
4. We confirm that the Company is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.



Yours sincerely

BGD Corporation Ltd

A handwritten signature in brown ink, appearing to be 'H Roberts', is written over a horizontal line.

Heath Roberts
Company Secretary
0419 473925

BGD Corporation Ltd
Level 36, 60 Margaret St
SYDNEY NSW 2000
Ph: +61 2 9269 9130



20 June 2016

Mr Heath Roberts
Company Secretary
BGD Corporation Limited

By email

Dear Mr Roberts

BGD Corporation Limited (the “Entity”): ASX Price and Volume Query

We have noted a change in the price of the Company’s securities from a closing price of \$0.036 on Friday, 17 June 2016, to an intraday high of \$0.046 today, 20 June 2016. We have also noticed an increase in the volume of trading in the Company’s securities over this period.

In light of the price increase, ASX asks you to respond separately to each of the following questions:

1. Is the Entity 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 the Entity relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1?

Please note that the recent trading in the Entity’s securities would suggest to ASX that such information may have ceased to be confidential and therefore the Entity 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 the Entity may have for the recent trading in its securities?
4. Please confirm that the Entity is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.



When and where to send your response

This request is made under, and in accordance with, Listing Rule 18.7. Your response is required as soon as reasonably possible and, in any event, by no later than **half an hour before the start of trading (i.e. before 9.30 am AEST) on Tuesday, 21 June 2016**. If we do not have your response by then, ASX will have no choice but to consider suspending trading in the Entity'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, the Entity'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 Sandra.Wutete@asx.com.au and tradinghaltspert@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 Rule 3.1

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.

The obligation of the Entity to disclose information under Listing Rules 3.1 and 3.1A is not confined to, nor is it necessarily satisfied by, answering the questions set out in this letter.

In responding to this letter, you should have regard to the Entity's obligations under Listing Rules 3.1 and 3.1A and also to Guidance Note 8 *Continuous Disclosure: Listing Rules 3.1 – 3.1B*.

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 the Entity'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*.

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

Yours sincerely

[sent electronically without signature]

Sandra Wutete
Senior Adviser, ASX Listings Compliance