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Corey Lian
Adviser, Listings Compliance (Sydney)
ASX Compliance Pty Limited
20 Bridge Street
SYDNEY NSW 2000

(2 pages by email)

Dear Mr Lian

I refer to your letter dated 22 January 2020 querying the increase in Biotron Limited's ('the Company') share price from a low of \$0.06 to a high of \$0.084 today, 22 January 2020 and provide the following response:

1. Is BIT 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?

No.

2. If the answer to question 1 is yes, can an announcement be made immediately? If not, why not and when is it expected that an announcement will be made?

N/A.

3. Is there any other explanation that the Company may have for the recent trading in the securities of the Company?

No. The Company notes that its non-executive directors Mr Robert B. Thomas and Professor Stephen A. Locarnini recently increased their shareholding in the Company by off market purchase.

In addition, as announced on 3 December 2019, the Company will be presenting its latest clinical trial data at the Conference on Retroviral and Opportunistic Infections ('CROI'), to be held in Boston MA, USA in March 2020. CROI is the preeminent international HIV-1 conference and brings together top basic, translational and clinical researchers from around the world to share the latest studies and developments in the ongoing battle against HIV/AIDS and related infectious diseases.

Since completing the BIT225-009 Phase 2 HIV-1 clinical trial and releasing positive results in late 2018, Biotron has continued to characterise the unique mechanism of action of its lead antiviral drug, BIT225. This has involved detailed post-trial analyses of trial samples. These analyses now provide key information on how BIT225 induces the significant beneficial immunological changes observed in the completed Phase 2 clinical trial and form the basis of the paper to be presented at CROI. The Directors are also pleased to advise that the new data from the Phase 2 trial, resulting from these post-trial analyses, have significantly enhanced the Company's intellectual property position. Two new patent applications have been filed, expanding the use of BIT225 and other Biotron anti-HIV-1 compounds.

The Company is focused on achieving a commercial outcome for its promising antiviral programs whilst continuing to progress its clinical HIV-1 program to prepare for more advanced clinical trials, including Phase 3 studies. To this end, Biotron has engaged an

international contract research organisation to complete chronic toxicology studies of BIT225 to enable the long-term human dosing required for this next stage of clinical development.

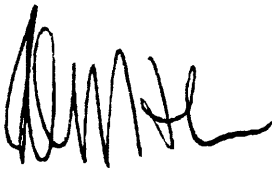
4. Please confirm that BIT is complying with the Listing Rules and, in particular, Listing Rule 3.1.

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

5. Please confirm that BIT's response to the above questions have been authorised and approved under its published continuous disclosure policy or otherwise by its board or an officer of BIT with delegated authority from the board to respond to ASX on disclosure matters?

The Company confirms that, the above questions have been authorised and approved in accordance with its published continuous disclosure policy.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Peter J. Nightingale', with a stylized, cursive script.

Peter J. Nightingale
Company Secretary

pjn10241



22 January 2020

Reference: 12899

Mr Peter Nightingale
Company Secretary
Biotron Limited

By email:

Dear Mr Nightingale

Biotron Limited ('BIT'): Price Query

We note the change in the price of BIT's securities from a low of \$0.06 to a high of \$0.084 today, 22 January 2020.

We also note the significant increase in the volume of BIT's securities traded today, 22 January 2020.

Request for Information

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

1. Is BIT 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 BIT relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in BIT's securities would suggest to ASX that such information may have ceased to be confidential and therefore BIT 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 BIT may have for the recent trading in its securities?
4. Please confirm that BIT is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that BIT'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 BIT 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 **9:30 AM AEDT tomorrow Thursday, 23 January 2020**. If we do not have your response by then, ASX will likely suspend trading in BIT'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, BIT'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 BIT'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 BIT'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 BIT'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 BIT'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

Corey Lian
Adviser, Listings Compliance (Sydney)