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8 January 2015

Ms Kimberley Brown  
Senior Adviser, Listings (Sydney)  
ASX Compliance Pty Limited  
20 Bridge Street  
SYDNEY NSW 2000

(1 page by email)

Dear Ms Brown

I refer to your letter dated 7 January 2015 querying the increase in Biotron Limited's ('the Company') share price from a close of \$0.115 on 6 January 2015 to \$0.145 today, together with an increase in the volume of securities traded and provide the following response:

1. Is the Company aware of any information concerning it that has not been announced which, if known, could be an explanation for recent trading in the securities of the Company?

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 price change and increase in volume in the securities of the Company?

**No. The Company notes that an ASX announcement 'Presentation to Investors' was made on 4 December 2014 covering the Company's ongoing activities and as advised to the ASX on 3 December 2014 the Phase 2 study (BIT225-008) of BIT225, the Company's lead antiviral drug, is fully recruited, with preliminary data expected late 1Q15. This is a key trial for the Company, designed to provide further safety and efficacy data in Hepatitis C genotype (HCV) 1 and 3 patients that demonstrates further safety and tolerability over 12 weeks of dosing. Previous studies have shown that BIT225 is able to eradicate HCV with 4 weeks dosing in combination with standard of care treatment, curing patients of their infection.**

4. Please confirm that the Company is in compliance with the listing rules and, in particular, listing rule 3.1.

**The Company confirms that it is, to the best of its knowledge and belief, in compliance with the Listing Rules and in particular, Listing Rule 3.1.**

Yours sincerely



Michelle Miller  
Managing Director

pjn7982

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7 January 2015

Mr V Manikandan  
Biotron Limited  
Level 2  
66 Hunter Street  
Sydney NSW 2000

Dear Mr Manikandan,

**Biotron Limited (the "Company")**  
**RE: PRICE QUERY**

We have noted a change in the price of the Company's securities from a close of \$0.115 on 6 January 2015 to an intraday high of \$0.145 today. We have also noted an increase in the volume of trading in the securities over this period.

In light of the price change, please respond to each of the following questions.

1. Is the Company aware of any information concerning it that has not been announced which, if known, could be an explanation for recent trading in the securities of the Company?
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 not later than 9.30 a.m. A.E.D.T Thursday, 8 January 2015. 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 [kimberley.brown@asx.com.au](mailto:kimberley.brown@asx.com.au) or by facsimile on facsimile number (02) 9241 7620. 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,



**Kimberley Brown**  
Senior Adviser, Listings Compliance (Sydney)

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