

6 December 2018

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

Via email: anjuli.sinniah@asx.com.au

Dear Ms Sinniah,

Babylon Pump & Power Limited – ASX Price Query

Babylon Pump & Power Limited (ASX: BPP) (“the Company” or “BPP”) refers to your query dated 6 December 2018 regarding (i) the change in the price of BPP’s securities from a closing price of \$0.018 on 5 December 2018 to an intraday high of \$0.032, and (ii) the increase in share trading volume on 6 December 2018 (“ASX Query”).

The Company provides the following response in respect to the ASX Query.

1. Is BPP 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”.

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

N/A

- (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).

N/A

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

N/A



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

- BPP investor presentation lodged to the market on 26 November 2018 which advised of an increase in forecasted revenue for FY19.
- Noting shares in the Company are tightly held, the limited availability of securities in the market and renewed interest in the mining services sector may be driving the share price higher via small purchase parcels.

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

Yes

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

Yes

Yours sincerely



Michael Shelby
Executive Chairman





6 December 2018

Mr Matt Power
Company Secretary
Babylon Pump & Power Limited

By email: mpower@babylonoperations.com

Dear Mr Power

Babylon Pump & Power Limited ('BPP'): Price Query

We note the change in the price of BPP's securities from a closing price of \$0.018 on 5 December 2018 to an intraday high of \$0.032 at the time of writing today, Thursday, 6 December 2018.

We also note the significant increase in the volume of BPP's securities traded from 5 December 2018 to 6 December 2018.

Request for Information

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

1. Is BPP 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 BPP relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in BPP's securities would suggest to ASX that such information may have ceased to be confidential and therefore BPP 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 BPP may have for the recent trading in its securities?
4. Please confirm that BPP is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that BPP'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 BPP 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 **01:00 PM AWST today Thursday, 6 December 2018**. If we do not have your response by then, ASX will likely suspend trading in BPP'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, BPP'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 ListingsCompliancePerth@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 BPP’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 BPP’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 BPP’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 BPP’s securities under Listing Rule 17.3.

Enquiries

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

Yours faithfully

Anjuli Sinniah
Senior Adviser, Listings Compliance (Perth)