



IPB Petroleum Limited

ABN 52 137 387 350

IPB Petroleum Limited (“IPB”): Price Query Response

Ms Kate Kidson
ASX Limited
Level 4
525 Collins Street
MELBOURNE VIC 3000

17 July 2018

I refer to your letter of 17 July 2018 which noted the change in IPB’s share price since 13 July 2018.

Using the numbering outlined in your letter, IPB responds to the questions in your letter as follows;

1. No, IPB is not aware of any information concerning it that has not been announce to the market which, if known by some in the market, could explain the recent trading in IPB’s securities.
2. Not applicable.
3. IPB is not aware of any other explanation for the recent trading in its securities. However, for completeness and transparency, IPB advises that it has today requested a trading halt in relation to a potential capital raise.
4. IPB considers that it is in compliance with the Listing Rules and in particular Listing Rule 3.1.
5. The responses to these questions have been authorized and approved in accordance with IPB’s published continuous disclosure policy.

Yours faithfully,
IPB Petroleum Limited

A handwritten signature in black ink, appearing to read 'M. Warwick', written over a faint, light-colored signature line.

Martin Warwick
Company Secretary



17 July 2018

Mr Martin Warwick

Company Secretary
IPB Petroleum Limited
23 Small Street
Hampton VIC 3188

By email: mwarwick@ipbp.com.au

Dear Mr Warwick

IPB Petroleum Limited (“IPB”): price query

We note the change in the price of ISX’s securities from a low of 2 cents at the close of trading on 13 July 2018 to a high of 3 cents in trading today.

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

1. Is IPB 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?

[In responding to this question, please consider in particular whether IPB is aware of any information that its earnings for the 6 month period ended on 30 June 2018:

- a) are likely to differ materially (downwards or upwards) from any earnings guidance it has given for the period; or
- b) if IPB has not given any earnings guidance for the period, are otherwise likely to come as a surprise to the market (by reference to analyst forecasts for the period or, if IPB is not covered by analysts, its earnings for the prior corresponding period)?

2. If the answer to question 1 is “yes”:

- a) Is IPB relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1?

Please note that the recent trading in IPB’s securities would suggest to ASX that such information may have ceased to be confidential and therefore IPB 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 IPB may have for the recent trading in its securities?

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

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5. Please confirm that IPB's responses to the questions above have been authorised and approved in accordance with its published continuous disclosure policy or otherwise by its board or an officer of IPB 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, and in accordance with, Listing Rule 18.7. Your response is required as soon as reasonably possible and, in any event, by half an hour before the commencement of trading (ie. 9.30 am AEST) tomorrow. If we do not have your response by then, ASX will have no choice but to consider suspending trading in IPB'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, IPB'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 kate.kidson@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 IPB'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 IPB'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 IPB's securities under Listing Rule 17.1.


If you wish to request 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*.

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



Kind regards

[Sent electronically without signature]

Kate Kidson

Principal Adviser, Listings Compliance (Melbourne)