

16th October 2017

Kate Kidson
Senior Adviser Listings Compliance
ASX Compliance Pty Ltd
Level 4 North Tower Rialto 525 Collins Street Melbourne VIC

Dear Kate

Imugene Limited: Response to ASX Price Query

Imugene Limited ("IMU" or "Company") refers to your letter dated 16th October 2017, in relation to a noted increase in the price and trading volume of the Company's securities.

The Company provides the following responses to your queries:

1. Is IMU 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 securities?

No.

2. If the answer to question 1 is "yes":

Not applicable, given response to question 1.

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

IMU is not aware of any other explanation for the price and volume increase other than as previously announced on the market:

- 6th October - Investor presentation &
- 16th October - Planned Expert Briefing – Latest Clinical and Commercial Advances.

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

IMU continues to be in compliance with the Listing Rules, including Listing Rule 3.1.

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

IMU confirms that the responses to the questions set out above have been authorised and approved accordingly.

Yours sincerely

Phillip Hains
Company Secretary
On behalf of the Board of Directors
Imugene Limited



16 October 2017

Justyn Stedwell
Company Secretary
Imugene Limited

By email only

Dear Mr Stedwell

Imugene Limited ("IMU"): price query

We note the change in the price of IMU's securities from a low of 1.6 cents at close on 11 October 2017 to a high of 2.2 cents at the time of writing today.

We also note the significant increase in the volume of IMU's securities traded on Friday last week and today.

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

1. Is IMU 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 IMU is aware of any information that its earnings for the 12 month period ending on 31 December 2017:

- a) are likely to differ materially (downwards or upwards) from any earnings guidance it has given for the period; or
- b) if IMU 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 IMU is not covered by analysts, its earnings for the prior corresponding period)?

2. If the answer to question 1 is "yes":

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

Please note that the recent trading in IMU's securities would suggest to ASX that such information may have ceased to be confidential and therefore IMU 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 IMU may have for the recent trading in its securities?
4. Please confirm that IMU is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that IMU’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 IMU 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 not later than half an hour before the start of trading (ie before 9.30 am AEDT) on Tuesday, 17 October 2017. If we do not have your response by then, ASX will have no choice but to consider suspending trading in IMU’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, IMU’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 IMU’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 IMU’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 IMU’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]

Kate Kidson
Principal Adviser, Listings Compliance (Melbourne)