



5 December 2022

Mr Dean Litis
Principal Adviser, Listings Compliance (Melbourne)
ASX Limited

By email: ListingsComplianceMelbourne@asx.com.au

Dear Mr Litis

ASX PRICE QUERY

I refer to your letter to Dubber Corporation Limited (**DUB** or the **Company**) dated 2 December 2022. The Company responds to each of your questions as follows:

1. *Is DUB 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 DUB relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in DUB's securities would suggest to ASX that such information may have ceased to be confidential and therefore DUB 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?*

Not applicable.

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

The Company's primary objective is to build a successful global technology business in unified call recording and conversational voice intelligence cloud services.

The Company continues to deliver on its strategy of expanding its service provider footprint where a Dubber product is embedded as a standard feature of every subscription on service provider networks as part of their telecommunications plans.

This was highlighted in its most recent quarterly activities reports (released to ASX on 28 July 2022 and 25 October 2022) and its annual general meeting presentation (released to ASX on 21 November 2022). The number of contracted service providers and subscriptions continues to grow in line with this strategy.



Separately, the Company notes the broader rally in stocks and shares in both the US and Australian markets over recent weeks, particularly as interest has strengthened in the technology sector.

Whilst the Company cannot explain the recent trading activity in its shares and changes in trading price and volume on ASX, the broader market rally and more generally confidence in the Company's ability to execute on its strategy could have led to this activity.

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

Confirmed.

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

Confirmed.

Yours faithfully



Ian Hobson
Company Secretary





2 December 2022

Reference: ODIN65126

Mr Ian Hobson
Company Secretary
Dubber Corporation Limited

By email

Dear Mr Hobson

Dubber Corporation Limited ('DUB'): Price - Query

ASX refers to the following:

- A. The change in the price of DUB's securities from a low of \$0.335 yesterday to a high today of \$0.455 at the time or writing.
- B. The significant increase in the volume of DUB's securities traded today.

Request for information

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

- 1. Is DUB 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 DUB relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in DUB's securities would suggest to ASX that such information may have ceased to be confidential and therefore DUB 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 DUB may have for the recent trading in its securities?
- 4. Please confirm that DUB is complying with the Listing Rules and, in particular, Listing Rule 3.1.
- 5. Please confirm that DUB'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 DUB 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 Monday, 5 December 2022**. 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, DUB'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 and may require DUB to request a trading halt immediately.

Your response should be sent to me by e-mail at **ListingsComplianceMelbourne@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.

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 DUB'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 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 DUB's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

In responding to this letter, you should have regard to DUB'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 DUB'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.

Release of correspondence between ASX and entity

We reserve the right to release a copy of this letter, your reply and any other related correspondence between us to the market under Listing Rule 18.7A.

Questions

If you have any questions in relation to the above, please do not hesitate to contact me.

Yours faithfully

Dean Litis

Principal Adviser, Listings Compliance (Melbourne)