Form 603

Corporations Act 2001 Section 671B

Notice of initial substantial holder

To Company Name/Scheme

Mitula Group Limited

ACN/ARSN

604 677 796

1. Details of substantial holder (1)

Name

Basilan Investments, S.R.L (a company incorporated in Spain) and its associate Mr Gonzalo del Pozo Sanchez

ACN/ARSN (if applicable)

Not applicable

The holder became a substantial holder on

1 July 2015

2. Details of voting power

The total number of votes attached to all the voting shares in the company or voting interests in the scheme that the substantial holder or an associate (2) had a relevant interest (3) in on the date the substantial holder became a substantial holder are as follows:

Class of securities (4)	Number of securities	Person's votes (5)	Voting power (6)
Fully paid ordinary shares	35,147,500	35,147,500	17.1%

3. Details of relevant interests

The nature of the relevant interest the substantial holder or an associate had in the following voting securities on the date the substantial holder became a substantial holder are as follows:

Holder of relevant interest	Nature of relevant interest (7)	Class and number of securities
Basilan Investments, S.R.L	Registered holder under section 608(I)(a)	17,180,000 ordinary shares
Gonzalo del Pozo Sanchez	Registered holder under section 608(I)(a) and relevant interest under section 608(I)	35,147,500 ordinary shares

4. Details of present registered holders

The persons registered as holders of the securities referred to in paragraph 3 above are as follows:

Holder of relevant interest	Registered holder of securities	Person entitled to be registered as holder (8)	Class and number of securities
Gonzalo del Pozo Sanchez	Gonzalo del Pozo Sanchez	Not applicable	17,967,500 ordinary shares
Basilan Investments, S.R.L	Basilan Investments, S.R.L.	Not applicable	17,180,000 ordinary shares

5. Consideration

The consideration paid for each relevant interest referred to in paragraph 3 above, and acquired in the four months prior to the day that the substantial holder became a substantial holder is as follows:

Holder of relevant interest	Date of acquisition	Consideration (9)		Class and number of securities
		Cash	Non-cash	
Gonzalo del Pozo Sanchez	17/04/2015		The transfer of 77,295 fully paid shares in the capital of Mitula Classified S.L. to Mitula Group Limited	17,967,500 ordinary shares
Basilan Investments, S.R.L	30/04/2015	\$2,151,192		17,180,000 ordinary shares

6. Associates

The reasons the persons named in paragraph 3 above are associates of the substantial holder are as follows:

Name and ACN/ARSN (if applicable)	Nature of association

7. Addresses

The addresses of persons named in this form are as follows:

Name	Address	
Gonzalo del Pozo Sanchez	Calle Tapia de Casarlego 11A, 28023 Madrid Spain	
Basilan Investments, S.R.L	Calle Cuevas del Valle 28, 28023 Madrid Spain	

Signature

print name Gonzalo del Pozo Sanchez	capacity Director
sign here	date 1 July 2015