

10 July 2018

Mr Emerson Walker
Advisor, Listings Compliance (Perth)
Australian Securities Exchange

BY EMAIL: emerson.walker@asx.com.au & tradinghaltsp Perth@asx.com.au

ASX price query

We refer to the letter from ASX to eSports Mogul Asia Pacific Limited (ASX: ESH) (**ESH** or the **Company**) dated 9 July 2018 regarding a price query by ASX (**ASX Letter**).

We respond to the questions raised by ASX in the ASX Letter as follows:

1. *Is ESH 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, but see comments below.

As part of its normal business, the Company is exploring various business opportunities. These include exploring opportunities to partner with Singtel in the Asian region to expand the use of Mogul Arena. At this stage, the confidential discussions with this party are preliminary and no definitive proposal has been put forward for the Company's consideration. The Company will keep the market updated as and if developments occur. See also the responses to question 3 below.

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

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

Not applicable

b) Can an announcement be made immediately?

Not applicable

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 ESH may have for the recent trading in its securities?*

As disclosed to the market on 18 June 2018, the Company has recently conducted a share placement to raise funds to accelerate the development of Mogul Arena on mobile and support an aggressive user acquisition, activity and monetisation strategy. As also disclosed to the market in the same announcement, the placement was led by Razer Inc. and included a significant investment from Cloud Alliance. As disclosed,

Razer has agreed to further strengthen its strategic partnership with the Company and Cloud Alliance's technology and gamer network in Asia Pacific will support the Company's mobile and web platforms. Other than the information that has already been announced to the market, the Company is not aware of any other explanation for the recent trading in its securities.

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

The Company is in compliance with the Listing Rules, and in particular Listing Rule 3.1.

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

We confirm that ESH's responses above to the questions in the ASX Letter have been authorised and approved by an officer of ESH with delegated authority from the Board to respond to ASX on disclosure matters.

eSports Mogul Asia Pacific Limited

George Lazarou
Company Secretary



9 July 2018

Mr George Lazarou

Company Secretary
eSports Mogul Asia Pacific Limited
45 Ventnor Avenue
West Perth WA 6005

By email: glazarou@citadelcapital.com.au

Dear Mr Lazarou

eSports Mogul Asia Pacific Limited (the "Entity"): price query

We note the change in the price of ESH's securities from a low of \$0.025 on Thursday, 5 July 2018 to a high of \$0.033 today.

We also note the significant increase in the volume of ESH's securities traded in the past few days.

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

1. Is ESH 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 ESH relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1?

Please note that the recent trading in ESH's securities would suggest to ASX that such information may have ceased to be confidential and therefore ESH 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 ESH may have for the recent trading in its securities?
4. Please confirm that ESH is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that ESH'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 ESH with delegated authority from the board to respond to ASX on disclosure matters.

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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 5.00pm (WST) today. If we do not have your response by then, ASX will have no choice but to consider suspending trading in ESH'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, ESH'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 tradinghaltsperth@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 ESH'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 ESH'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 ESH'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]

Emerson Walker

Advisor, Listings Compliance (Perth)