



23 March 2015

Australian Securities Exchange  
Company Announcements Platform

**RESPONSE TO ASX PRICE QUERY**

Mobile Embrace Limited (**ASX: MBE**, '**Mobile Embrace**' or the '**Company**') provides this response in relation to the ASX's letter dated 20 March 2015 regarding the change in the price of the Company's securities from a close of \$0.155 on 11 March to an intra-day high of \$0.195 on 20 March and the increase in the volume of trading in securities.

In response to the questions detailed in the ASX's letter the Company advises as follows:

1. The Company is not 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. Not applicable.
3. The Company is not aware of any other explanation for the recent trading in its securities.
4. The Company confirms that is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.

Yours faithfully,

A handwritten signature in black ink that reads 'Justin B Clyne'.

**JUSTIN B CLYNE**  
Company Secretary

**About Mobile Embrace Limited**

Mobile Embrace Limited (ASX: MBE) is a mobile payments and mobile marketing company. We are a Digital Distribution Network for the complete end-to-end mobile customer life-cycle. Through our integrated and award winning mobile marketing, advertising and m-payments infrastructure (including a Tier 1 local/global premium publisher advertising network, mobile media trading desk, m-commerce and mobile marketing platforms and applications) we enable the reach, engagement, transactions with and embracement of consumers via mobiles and tablets. For more information please visit: [www.mobileembrace.com](http://www.mobileembrace.com)

**Mobile Embrace -- Further information:**

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20 March 2015

Mr Justin Clyne  
Company Secretary  
Mobile Embrace Limited  
Level 10  
100 William Street  
East Sydney NSW 2011

By email

Dear Mr Clyne

**Mobile Embrace Limited (the "Company"): ASX Price Query**

We have noted a change in the price of the Company's securities from a low of 15.5 cents on Wednesday, 11 March 2015 to an intra-day high of 19.5 cents at the time of writing today, Friday, 20 March 2015.

We also note an increase in the trading volume of the Company's securities.

In light of the price and volume increase, ASX asks you to respond separately to each of the following questions:

1. Is the Company 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 the Company is aware of any information that its earnings for the 12 month period ending on 30 June 2015:

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

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

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

Please note that the recent trading in the Company's securities would suggest to ASX that such information may have ceased to be confidential and therefore the Company 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 the Company may have for the recent trading in its securities?
4. Please confirm that the Company is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.

### 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 a.m. AEDT**) on **Monday, 23 March 2015**. If we do not have your response by then, ASX will have no choice but to consider suspending trading in the Company’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, the Company’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 [eonyura@asx.com.au](mailto:eonyura@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 Rule 3.1

Listing Rule 3.1 requires a listed Company 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 Company’s securities. Exceptions to this requirement are set out in Listing Rule 3.1A.

The obligation of the Company to disclose information under Listing Rules 3.1 and 3.1A is not confined to, nor is it necessarily satisfied by, answering the questions set out in this letter.

In responding to this letter, you should have regard to the Company’s obligations under Listing Rules 3.1 and 3.1A and also to Guidance Note 8 *Continuous Disclosure: Listing Rules 3.1 – 3.1B*.

### 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 the Company’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]*

Elvis Onyura

**Senior Adviser, Listings Compliance (Sydney)**