

11 May 2015

Violetta Codreanu
Listings Compliance (Sydney)
ASX Compliance Pty Ltd
20 Bridge Street
Sydney NSW 2000

Dear Ms Codreanu

Mooter Media Limited – Response to letter re breaches

We refer to your letter dated 7 May 2015 outlining various matters in relation to breaches by Mooter Media Limited (**'the Company'**) as a result of a filing of an Appendix 3X for Mr Graham Libbesson as a Director.

Set out below is our response to your questions:

1. the Directors interest was lodged late due to the third party contractor who assist the Company with the preparation of the documentation not been available at the time. The Third party contractor has been providing assistance to the Company on an accrued basis and as a result, it is difficult for the Company to access immediate services;
2. as previously noted, the Directors have been actively involved in finalising a funding package which would afford the Company with the ability to hire a professional company secretary. As an interim measure, the Company is using the services of a professional accounting firm who is experienced in the area of listed companies ASX and accounting functions and have been assisting with the corporate secretarial, accounting and administrative duties. Once the Company has the necessary funding in place, it will be able to obtain the use of the services of the above firm on a needs basis with timely service;
3. refer point to 2 above; and
4. The directors understand their obligations to keep the market informed and will ensure future notifications and announcements are timely.

We trust that the above adequately addresses your concerns.

Yours faithfully



Jacob Khouri
Director



7 May 2015

Mr Jacob Khouri
Company Secretary
Mooter Media Limited
4 Tennyson Street
Williamstown VIC 3016

By Email

Dear Mr Khouri

Mooter Media Limited (the "Company")

We refer to the following:

1. The Appendix 3X for Mr Graham Libbesson lodged by the Company with ASX on 4 May 2015 (the "Appendix 3X");
2. Listing rule 3.19A.1 which requires an entity to tell ASX the following:

The notifiable interests of a director of the entity (or in the case of a trust, a director of the responsible entity of the trust) at the following times.

- On the date that the entity is admitted to the official list.
- On the date that a director is appointed.

The entity must complete Appendix 3X and give it to ASX no more than 5 business days after the entity's admission or a director's appointment.

3. Listing rule 3.19B which states as follows.

An entity must make such arrangements as are necessary with a director of the entity (or in the case of a trust, a director of the responsible entity of the trust) to ensure that the director discloses to the entity all the information required by the entity to give ASX completed Appendices 3X, 3Y and 3Z within the time period allowed by listing rule 3.19.A. The entity must enforce the arrangements with the director.

4. The Companies Update dated 27 June 2008, reminding listed entities of their obligation to notify ASX within 5 business days of the notifiable interests in securities held by each director and outlining the action that ASX would take in relation to breaches of listing rules 3.19A and 3.19B.

As the Appendix 3X indicated that the director was appointed on 20 April 2015, it appears that the Appendix 3X should have been lodged with ASX by 27 April 2015. As the Appendix 3X was lodged on 4 May 2015, it appears the Company may be in breach of listing rules 3.19A and/or 3.19B.

Please note that ASX is required to record details of breaches of the listing rules by listed companies for its reporting requirements.

ASX reminds the Company of its contract with ASX to comply with the listing rules. In the circumstances ASX considers that it is appropriate that the Company make necessary arrangements to ensure there is not a reoccurrence of a breach of the listing rules.

Having regard to listing rules 3.19A and 3.19B and Guidance Note 22: "Director Disclosure of Interests and Transactions in Securities - Obligations of Listed Entities", we ask that you answer each of the following questions.

1. Why was the Appendix 3X lodged late?
2. What arrangements does the Company have in place with its directors to ensure that it is able to meet its disclosure obligations under listing rule 3.19A?
3. If the current arrangements are inadequate or not being enforced, what additional steps does the Company intend to take to ensure compliance with listing rule 3.19B?

Your response should be sent to me by e-mail to violetta.codreanu@asx.com.au. It should **not** be sent to the ASX Market Announcements Office.

A response is requested as soon as possible and, in any event, not later than 9.30 a.m. AEST on Tuesday, 12 May 2015.

Under listing rule 18.7A, a copy of this query and your response will be released to the market, so your response should be in a form suitable for release and should separately address each of the questions asked. If you have any queries or concerns, please contact me immediately.

Yours sincerely,

[Sent electronically without signature]

Violetta Codreanu
Adviser, Listings Compliance (Sydney)