Form 603

Corporations Act 2001

Section 671B

Notice of initial substantial shareholder

To: Company name/ Scheme	WEBSPY LIMITED
ACN/ ARSN	066153982

1. Details of substantial holder (1)

Name	GOLDOAK INVESTMENTS LIMITED
ACN/ ARSN (if applicable)	UK COMPANY NUMBER: 06953715

The holder became substantial on	20/11/2009

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 shareholder because a substantial shareholder are as follows:

Class of securities (4)	Number of securities	Person's votes (5)	Voting Power (6)
FULLY PAID ORDINARY SHARES	71,053,387	71,053,387	30.35%

3. Details in relevant interests

The nature of, a relevant interest of 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
KERKOW INVESTMENTS LIMITED	INDIRECTLY HELD	21,688,752 FULLY PAID ORDINARY SHARES
REMELLON INVESTMENTS LIMITED	INDIRECTLY HELD	16,459,890 FULLY PAID ORDINARY SHARES
NOBIUM INVESTMENTS LIMITED	INDIRECTLY HELD	32,904,745 FULLY PAID ORDINARY SHARES

4. Details of present registered holders

The persons registered as holders of the securities referred to in 3 paragraph 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
KERKOW INVESTMENTS LIMITED	KERKOW INVESTMENTS LIMITED	KERKOW INVESTMENTS LIMITED	21,688,752 FULLY PAID ORDINARY SHARES
REMELLON INVESTMENTS LIMITED	REMELLON INVESTMENTS LIMITED	REMELLON INVESTMENTS LIMITED	16,459,890 FULLY PAID ORDINARY SHARES
NOBIUM INVESTMENTS LIMITED	NOBIUM INVESTMENTS LIMITED	NOBIUM INVESTMENTS LIMITED	32,904,745 FULLY PAID ORDINARY SHARES

5. Consideration

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

Holder of relevant interest	Date of acquisition	Consideration (9)		Class and number of securities
		Cash	Non-cash	
KERKOW INVESTMENTS LIMITED	20/11/2009		SEE NOTE 1	21,688,752 FULLY PAID ORDINARY SHARES
REMELLON INVESTMENTS LIMITED	20/11/2009		SEE NOTE 1	16,459,890 FULLY PAID ORDINARY SHARES
NOBIUM INVESTMENTS LIMITED	20/11/2009		SEE NOTE 1	32,904,745 FULLY PAID ORDINARY SHARES

Note 1: These shares were issued in consideration for the acquisition of a 100% interest in the Marketboomer group of entities.

6. Associates

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

Name and ACN/ARSN (if applicable)	Nature of association
KERKOW INVESTMENTS LIMITED	RELATED BODY CORPORATE
REMELLON INVESTMENTS LIMITED	RELATED BODY CORPORATE
NOBIUM INVESTMENTS LIMITED	RELATED BODY CORPORATE

7. Addresses

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

Name	Address
GOLDOAK INVESTMENTS LIMITED	C/- RUSSELL BEDFORD HOUSE CITY FORUM, 250 CITY ROAD, LONDON EC1V 2QQ UK
KERKOW INVESTMENTS LIMITED	THE QUADRANT 118 LONDON ROAD KINGSTON SURRY KT2 6QJ UK
REMELLON INVESTMENTS LIMITED	C/- RUSSELL BEDFORD HOUSE CITY FORUM, 250 CITY ROAD, LONDON EC1V 2QQ UK
NOBIUM INVESTMENTS LIMITED	C/- RUSSELL BEDFORD HOUSE CITY FORUM, 250 CITY ROAD, LONDON EC1V 2QQ UK

Signature

print name _CARON MILLINER_ capacity _DIRECTOR_

sign here _____ date

DIRECTIONS

(1) If there are a number of substantial holders with similar or related relevant interests (eg. a corporation and its related corporations, or the manager and trustee of an equity trust), the names could be included in an annexure to the form. If the relevant interests of a group of persons are essentially similar, they may be referred to throughout the form as a specifically named group if the membership of each group, with the names and addresses of members is clearly set out in paragraph 7 of the form.

(2) See the definition of "associate" in section 9 of the Corporations Act 2001.

(3) See the definition of "relevant interest" in sections 608 and 671B(7) of the Corporations Act 2001.

(4) The voting shares of a company constitute one class unless divided into separate classes.

(5) The total number of votes attached to all the voting shares in the company or voting interests in the scheme (if any) that the person or an associate has a relevant interest in.

(6) The person's votes divided by the total votes in the body corporate or scheme multiplied by 100.

(7) Include details of:
   (a) any relevant agreement or other circumstances because of which the change in relevant interest occurred. If subsection 671B(4) applies, a copy of any document setting out the terms of any relevant agreement, and a statement by the person giving full and accurate details of any contract, scheme or arrangement, must accompany this form, together with a written statement certifying this contract, scheme or arrangement; and

   (b) any qualification of the power of a person to exercise, control the exercise of, or influence the exercise of, the voting powers or disposal of the securities to which the relevant interest relates (indicating clearly the particular securities to which the qualification applies).

   See the definition of "relevant agreement" in section 9 of the Corporations Act 2001.

(8) If the substantial holder is unable to determine the identity of the person (eg. if the relevant interest arises because of an option) write "unknown".

(9) Details of the consideration must include any and all benefits, money and other, that any person from whom a relevant interest was acquired has, or may, become entitled to receive in relation to that acquisition. Details must be included even if the benefit is conditional on the happening or not of a contingency. Details must be included of any benefit paid on behalf of the substantial holder or its associate in relation to the acquisitions, even if they are not paid directly to the person from whom the relevant interest was acquired.