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16 May 2014

Mr Dean Litis  
Principal Adviser  
Listing Compliance (Melbourne)  
ASX Markets Supervision Pty Ltd  
Level 5, North Tower, 525 Collins Street  
Melbourne VIC 3000

Dear Dean,

**Webjet Limited (the “Entity”) – Price Query**

Referring to your email of 16 May 2014. Our response in relation to your queries is as follows:-

1. No
2. N/A
3. There is apparently ill-informed and inaccurate financial market commentary which is suggesting that Webjet’s Australian Market share is under material threat from unnamed overseas online travel agents. There is no factual foundation that we are aware of that can support this conclusion. The latest Hitwise<sup>1</sup> data shows that we have increased our lead in visitation in the online travel agency category from 12.94% in March to 13.21% in April. Although there is some evidence in the published Australian Airline traffic data that the Australian Travel Market is subdued and without year on year domestic leisure growth, Webjet reconfirms its market guidance released on 13 November 2013 of EBITDA of \$21.5m.
4. Webjet is in compliance with all listing rules including rule 3.1

If you have any further questions please email or call me.

Yours Sincerely,

[Sent electronically, without signature]

Michael Sheehy | Chief Financial Officer & Company Secretary  
Level 2, 509 St Kilda Road, Melbourne  
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<sup>1</sup> Experian Hitwise monitors Consumer and Competitor Online Intelligence.



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16 May 2014

Michael Sheehy  
Company Secretary & Chief Financial Officer  
Webjet Limited  
Level 2  
509 St Kilda Road  
Melbourne VIC 3004

By email only

Dear Michael

**Webjet Limited (the “Entity”) - Price Query**

We have noted a change in the price of the Entity’s securities from a high of \$2.78 on 1 May 2014, to a low of \$2.30 yesterday 15 May 2014 and a current price of \$2.31 at the time of writing today.

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

1. Is the Entity 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”:
  1. Is the Entity relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1?

Please note that the recent trading in the Entity’s securities would suggest to ASX that such information may have ceased to be confidential and therefore the Entity 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.

In responding to this question, please consider in particular whether the Entity is aware of any information that its earnings for the 12 month period ending on 30 June 2014 are likely to come as a surprise to the market by reference to its earnings for the previous corresponding period
  2. 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).
  3. 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 Entity may have for the recent trading in its securities?
4. Please confirm that the Entity 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 **9.30 a.m. AEST Monday 19 May 2014**. If we do not have your response by then, ASX will have no choice but to consider suspending trading in the Entity'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 Entity'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. 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 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.

The obligation of the Entity 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 Entity'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 Entity'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]

Dean Litis

**Principal Adviser**

**Listings Compliance (Melbourne)**