
Form 605

Corporations Act 2001
Section 671B

Notice of ceasing to be a substantial holder

To: Company Name/Scheme: **ELDERS LIMITED**

ACN/ARSN: **004 336 636**

1. Details of substantial holder

Name: Commonwealth Bank of Australia ACN 123 123 124 (CBA) and its related bodies corporate listed in annexure A

The holder ceased to be a substantial holder on: **31/10/2018**

The previous notice was given to the company on: **01/11/2018**

The previous notice was dated: **30/10/2018**

2. Changes in relevant interests

Particulars of each change in, or change in the nature of, a relevant interest of the substantial holder or an associate in voting securities of the company or scheme, since the substantial holder was last required to give a substantial holding notice to the company or scheme are as follows:

Date of change	Person whose relevant interest changed	Nature of change	Consideration given in relation to change	Class and number of securities affected	Person's votes affected
See annexure B to this notice					

3. Changes in association

The persons who have become associates of, ceased to be associates of, or have changed the nature of their association with, the substantial holder in relation to voting interests in the company or scheme are as follows:

Name and ACN/ARSN (if applicable)	Nature of association

4. Addresses

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

Name	Address
Avanteos Investments Limited ACN 096 259 979	Ground Floor Tower 1, 201 Sussex Street, Sydney, NSW, 2000, Australia
Commonwealth Bank of Australia ACN 123 123 124	Ground Floor Tower 1, 201 Sussex Street, Sydney, NSW, 2000, Australia
Realindex Investments Pty Limited ACN 133 312 017	Ground Floor Tower 1, 201 Sussex Street, Sydney, NSW, 2000, Australia

5. Signature

A handwritten signature in black ink, appearing to read "Clare McManus". The signature is fluid and cursive, with the first name "Clare" and the last name "McManus" clearly distinguishable.

Dated the 02 day of November 2018

Clare McManus - Company Secretary

Annexure A

This is annexure A referred to in Form 605, Notice of ceasing to be a substantial holder dated 31/10/2018



Clare McManus

Company Secretary

Dated the 02/11/2018

SCHEDULE

AEGIS CORRECTIONAL PARTNERSHIP PTY LTD
AEGIS LIMITED
AHL FINANCE HOLDINGS PTY LTD
AHL FINANCE PTY LTD
AHL HOLDINGS PTY LIMITED
AHL INVESTMENTS PTY LTD
ALTONA V6 PTY LIMITED
ASB BANK LIMITED
ASB CAPITAL LIMITED (NZX-ASBPA)
ASB CAPITAL NO.2 LIMITED (NZX-ASBPB)
ASB FINANCE LIMITED
ASB FUNDING LIMITED
ASB GROUP (LIFE) LIMITED
ASB GROUP INVESTMENTS LIMITED
ASB HOLDINGS LIMITED
ASB MANAGEMENT SERVICES LIMITED
ASB NOMINEES LIMITED
ASB SECURITIES LIMITED
ASKLEPIOS LIMITED
ASPIRE SCHOOLS FINANCING (QLD) PTY LIMITED
ASPIRE SCHOOLS HOLDINGS (QLD) PTY LIMITED
AUSSIE CENTRE ADMINISTRATION PTY LIMITED
AUSSIE FINANCIAL PLANNING SERVICES PTY LTD
AUSSIE HOME INSURANCE PTY LIMITED
AUSSIE HOME LOANS HOLDINGS PTY LTD
AUSSIE HOME LOANS PTY LIMITED
AUSSIE HOME SECURITY PTY LIMITED
AUSSIE MORTGAGE MARKET HOLDINGS PTY LIMITED
AUSSIEHOMELoANS.COM.AU PTY LTD
AUSTRALIAN HOME LOANS HOLDINGS PTY LIMITED
AUSTRALIAN INVESTMENT EXCHANGE LIMITED
AVANTEOS INVESTMENTS LIMITED
AVANTEOS PTY LTD
BANK OF HANGZHOU CO., LTD
BANKWEST FOUNDATION LIMITED
BDELTA VESSEL NO 1 PTY LTD
BDELTA VESSEL NO 2 PTY LTD
BDELTA VESSEL NO 3 PTY LTD
BDELTA VESSEL NO 4 PTY LTD
BOCOMMLIFE INSURANCE COMPANY LIMITED
BOND INVESTMENTS NO 1 LIMITED
BOND INVESTMENTS UK LIMITED
BW FINANCIAL ADVICE LIMITED
BW SECURITISATION MANAGEMENT PTY LTD
BWA GROUP SERVICES PTY LTD
BWA INTELLECTUAL PROPERTY HOLDINGS LIMITED
CAPITAL 121 PTY LIMITED
CBA A319 4624 PTY LIMITED
CBA A319 4635 PTY LIMITED
CBA A320 4077 PTY LTD
CBA A320 4948 PTY LIMITED
CBA A320 5156 PTY LIMITED
CBA A320 5249 PTY LTD
CBA A320 5289 PTY LTD
CBA A320 5638 PTY LTD
CBA A320 6749 PTY LIMITED
CBA A320 AIRCRAFT NO1 PTY LTD
CBA A330 1427 Pty Ltd
CBA A330 1453 PTY LIMITED
CBA A330 1561 PTY LTD

CBA AIR A320 2714 PTY LIMITED
 CBA AIR PTY LTD
 CBA ASSET FINANCE (NZ) LIMITED
 CBA ASSET HOLDINGS (NZ) LIMITED
 CBA B377 37091 PTY LTD
 CBA B738 39822 PTY LIMITED
 CBA B773 60333 PTY LIMITED
 CBA CAPITAL AUSTRALIA PTY LIMITED
 CBA CAPITAL HOLDINGS INC.
 CBA CORPORATE SERVICES (NSW) PTY LIMITED
 CBA CORPORATE SERVICES (VIC) PTY LIMITED
 CBA DIGITAL SETTLEMENTS PTY LTD
 CBA DIGITAL SOLUTIONS DEVELOPMENT COMPANY LIMITED
 CBA ES BUSINESS SERVICES PTY LTD
 CBA EUROPE LIMITED
 CBA FUNDING (NZ) LIMITED
 CBA FUNDING HOLDINGS PTY LTD
 CBA INTERNATIONAL FINANCE PTY. LIMITED
 CBA INTERNATIONAL FINANCIAL SERVICES LIMITED (formerly known as COMMBANK MANAGEMENT CONSULTING (ASIA) COMPANY LIMITED)
 CBA INVESTMENTS (NO.4) LIMITED
 CBA ISO Containers Pty Ltd
 CBA IT LEASING NO 3 PTY LTD
 CBA MTE RAIL COMPANY PTY LIMITED
 CBA NZ HOLDING LIMITED
 CBA RAIL & TRAM COMPANY PTY LIMITED
 CBA ROLLING STOCK COMPANY NO.1 PTY LIMITED
 CBA SA HOLDINGS PROPRIETARY LIMITED
 CBA SAF HOLDING PTY LIMITED
 CBA SERVICES PRIVATE LIMITED
 CBA SPECIALISED FINANCING PTY LIMITED
 CBA USD INVESTMENTS PTY LIMITED
 CBFC LEASING PTY. LIMITED
 CBFC LIMITED
 CBSA FOUNDATION NPC
 CFSGAM IP HOLDINGS PTY LIMITED
 CFSPAI EUROPE CO LIMITED
 CFSPAI EUROPE HOLDCO LIMITED
 CIPL ARARAT PTY LTD
 CIPL SA SCHOOLS PTY LTD
 CISL (NO.1) PTY LIMITED
 CMG ASIA LIFE HOLDINGS LIMITED
 CMG ASIA PTY LTD
 CMLA Services Pty Ltd
 COLLATERAL LEASING PTY LTD
 COLONIAL FIRST STATE ASSET MANAGEMENT (AUSTRALIA) LIMITED
 COLONIAL FIRST STATE GROUP LIMITED
 COLONIAL FIRST STATE INFRASTRUCTURE HOLDINGS LIMITED
 COLONIAL FIRST STATE INFRASTRUCTURE MANAGERS (AUSTRALIA) PTY LTD
 COLONIAL FIRST STATE INVESTMENTS LIMITED
 COLONIAL FIRST STATE MANAGED INFRASTRUCTURE LIMITED
 COLONIAL HOLDING COMPANY LIMITED
 COLONIAL MUTUAL SUPERANNUATION PTY. LTD.
 COLONIAL SERVICES PTY LIMITED
 COMMBANK EUROPE LIMITED
 COMMBANK FOUNDATION LIMITED
 COMMBANK MANAGEMENT CONSULTING (SHANGHAI) COMPANY LIMITED
 COMMFUNDATION PTY LIMITED
 COMMONWEALTH AUSTRALIA SECURITIES LLC
 COMMONWEALTH BANK OF AUSTRALIA
 COMMONWEALTH BANK OF AUSTRALIA (UK) STAFF BENEFITS SCHEME TRUSTEE COMPANY LIMITED
 COMMONWEALTH BANK OF SOUTH AFRICA (HOLDING COMPANY) LIMITED (formerly NEWSHELF 1314 (PTY) LTD)
 COMMONWEALTH BANK OF SOUTH AFRICA LIMITED (formerly NEWSHELF 1315 (PTY) LTD)
 COMMONWEALTH BANK OFFICERS SUPERANNUATION CORPORATION PTY LIMITED
 Commonwealth Custodial Services Pty Ltd
 COMMONWEALTH DEVELOPMENT BANK OF AUSTRALIA PTY LIMITED
 COMMONWEALTH FINANCIAL PLANNING LIMITED
 COMMONWEALTH INSURANCE HOLDINGS LIMITED
 COMMONWEALTH INSURANCE LIMITED
 COMMONWEALTH INVESTMENTS PTY LIMITED
 COMMONWEALTH PRIVATE LIMITED
 COMMONWEALTH SECURITIES LIMITED
 COMMONWEALTH INTERNATIONAL HOLDINGS PTY LIMITED
 COMSEC NOMINEES PTY LIMITED
 CORE EQUITY SERVICES NOMINEES PTY LIMITED
 COUNT FINANCIAL LIMITED
 CRYSTAL AVENUE PTY LIMITED
 CTB AUSTRALIA LIMITED
 ELLAS CONTAINER SHIP COMPANY 1 PTY LIMITED
 ELLAS CONTAINER SHIP COMPANY 2 PTY LIMITED

EMERALD HOLDING COMPANY PTY LIMITED
 FINANCIAL WISDOM LIMITED
 FINCONNECT (AUSTRALIA) PTY LTD
 FIRST STATE CINDA FUND MANAGEMENT COMPANY LIMITED
 First State European Diversified Infrastructure Sarl
 First State Funds Plc
 First State Global Umbrella Fund Public Limited Company
 FIRST STATE INFRASTRUCTURE MANAGERS (INTERNATIONAL) LIMITED
 First State Investment Management (UK) Limited
 FIRST STATE INVESTMENT MANAGERS (ASIA) LIMITED
 First State Investment Services (UK) Limited
 FIRST STATE INVESTMENTS (HONG KONG) LIMITED
 FIRST STATE INVESTMENTS (NZ) LIMITED
 FIRST STATE INVESTMENTS (SINGAPORE)
 First State Investments (UK Holdings) Limited
 First State Investments (UK) Limited
 FIRST STATE INVESTMENTS (US) LLC
 First State Investments Fund Management Sarl
 First State Investments GIP Management Sarl
 FIRST STATE INVESTMENTS HOLDINGS (SINGAPORE) LIMITED
 First State Investments ICVC
 First State Investments International Inc
 First State Investments International Limited
 FIRST STATE NOMINEES (HONG KONG) LIMITED
 FMG ASSET LEASING PTY LTD
 FSIB Ltd.
 FSIC Limited (formerly known as First State Investments (Cayman) Limited)
 GT USD FUNDING PTY LIMITED
 HAZELWOOD INVESTMENT COMPANY PTY LIMITED
 HOMEPATH PTY LIMITED
 INVERLOCH LEASING PTY LIMITED
 INVESTMENT CUSTODIAL SERVICES LIMITED
 INVESTORWEB.COM. PTY LIMITED
 IWL BROKING SOLUTIONS PTY LIMITED
 IWL PTY LIMITED
 JACQUES MARTIN ADMINISTRATION AND CONSULTING PTY LTD
 JACQUES MARTIN PTY. LTD.
 LOFT NO 1 PTY LIMITED
 LOFT NO 2 PTY LIMITED
 LOFT NO.3 PTY LIMITED
 MIS FUNDING NO.1 PTY LIMITED
 MORTGAGE HOLDING TRUST COMPANY LIMITED
 MTE DEBT VEHICLE PTY LTD
 MTE LESSOR 1 PTY LTD
 MTE LESSOR 2 PTY LTD
 MTE LESSOR 3 PTY LTD
 MTE LESSOR 4 PTY LTD
 MTE LESSOR 5 PTY LTD
 MTE NOMINEE PARTNER PTY LTD
 NETSHARE NOMINEES PTY LTD
 NEWPORT LIMITED
 ORE & OVERBURDEN PTY LIMITED
 PREFERRED CAPITAL PTY LIMITED
 PREMIUM ALTERNATIVE INVESTMENTS PTY LIMITED
 PREMIUM CUSTODY SERVICES PTY LTD
 PREMIUM PLANTATIONS PTY LIMITED
 PREMIUM PLANTATIONS SERVICES PTY LTD
 PT BANK COMMONWEALTH
 PT COMMONWEALTH LIFE
 PT FIRST STATE INVESTMENTS INDONESIA
 QILU BANK CO., LTD.
 REALINDEX INVESTMENTS PTY LIMITED
 RELIANCE ACHIEVER PTY LIMITED
 RESIDENTIAL MORTGAGE GROUP PTY LTD
 ROCK & RUBBLE (DEBT VEHICLE) PTY LIMITED
 ROCK & RUBBLE (EXISTING) PTY LIMITED
 ROCK & RUBBLE (NEW) PTY LIMITED
 SAF MINING NO.2 PTY LIMITED
 SAF Mining No1 Pty Limited
 Safe No 27 Pty Ltd
 SAFE NO1 PTY LTD
 SAFE NO2 PTY LTD
 SAFE NO24 PTY LTD
 SAFE NO26 PTY LTD
 SAFE NO3 PTY LTD
 SAFE NO4 PTY LIMITED
 SAFE NO9 PTY LIMITED
 SAFE USD HOLDINGS PTY LTD
 SECURITISATION ADVISORY SERVICES PTY. LIMITED

SECURITISATION MANAGEMENT SERVICES LIMITED
SENBARY PTY LIMITED
SHARE DIRECT NOMINEES PTY LIMITED
SHARE INVESTMENTS PTY LIMITED
SI Holdings Limited
SOVEREIGN ASSURANCE COMPANY LIMITED
SOVEREIGN SERVICES LIMITED
SOVEREIGN SUPERANNUATION FUNDS LIMITED
SOVEREIGN SUPERANNUATION TRUSTEES LIMITED
ST ANDREW'S AUSTRALIA PTY LTD
STATE NOMINEES LTD
T.W. CUSTODIANS LIMITED
TANKSTREAM RAIL (BY - 1) PTY LIMITED
TANKSTREAM RAIL (BY - 2) PTY LIMITED
TANKSTREAM RAIL (BY - 3) PTY LIMITED
TANKSTREAM RAIL (BY - 4) PTY LIMITED
TANKSTREAM RAIL (SW - 1) PTY LIMITED
TANKSTREAM RAIL (SW - 2) PTY LIMITED
TANKSTREAM RAIL (SW - 3) PTY LIMITED
TANKSTREAM RAIL (SW - 4) PTY LIMITED
TANKSTREAM RAIL (VICTORIA) PTY LIMITED
THE COLONIAL MUTUAL LIFE ASSURANCE SOCIETY LIMITED
TOTAL KEEN INVESTMENT LIMITED
TYME CAPITAL PROPRIETARY LIMITED
TYME INFIELD PROPRIETARY LIMITED (formerly know as EDGE FIELD MARKETING PROPRIETARY LTD)
TYME INTELLECTUAL PROPERTIES PROPRIETARY LIMITED
TYME INVESTMENTS PROPRIETARY LIMITED
TYME TECHNICAL SOLUTIONS PROPRIETARY LIMITED
VATOSCAN PROPRIETARY LIMITED
VH-VZF PTY LTD
VH-VZG PTY LTD
VH-VZH PTY LTD
VIETNAM INTERNATIONAL BANK (VIETNAM INTERNATIONAL COMMERCIAL JOINT STOCK BANK)
WESTSIDE PROPERTIES LIMITED
WIZARD HOME LOANS PTY LIMITED

Annexure B

This is annexure B referred to in Form 605, Notice of ceasing to be a substantial holder dated 31/10/2018

Clare McManus

Clare McManus

Company Secretary

Dated the 02/11/2018

Date of change	Person whose relevant interest changed	Nature of change	Consideration given in relation to change	Class and number of securities affected	Person's votes affected
Wednesday, 31 October 2018	Colonial First State Investments Limited (Note 1) ACN 002 348 352	Sale	191,482.37	27,908 Ordinary shares	27,908
Wednesday, 31 October 2018	Commonwealth Bank of Australia ACN 123 123 124	Borrow Decrease	N/A	177,986 Ordinary shares (returned to Citigroup Global Markets Limited (Agreement 13), see Annexure C)	177,986
Wednesday, 31 October 2018	Realindex Investments Pty Limited ACN 133 312 017	Purchase	31,879.17	4,373 Ordinary shares	4,373
Wednesday, 31 October 2018	Realindex Investments Pty Limited ACN 133 312 017	Sale	3,790.88	551 Ordinary shares	551

Annexure C

This is annexure C referred to in Form 605, Notice of ceasing to be a substantial holder dated 31/10/2018



Clare McManus

Company Secretary

Dated the 02/11/2018

Commonwealth Bank of Australia will, if requested by the company or responsible entity to whom this form must be given or by the Australian Securities and Investments Commission (ASIC), give a copy of one or more of the following agreements to the company, responsible entity or ASIC (as appropriate).

Citigroup Global Markets Limited (Agreement 13)

Type of agreement:	Global Master Securities Lending Agreement
Parties to agreement:	(1) Commonwealth Bank of Australia and (2) Citigroup Global Markets Limited
Can the parties exercise voting rights attaching to the securities?	No
If yes, in what circumstances?	N/A
Date on which the securities were (or are) expected to be delivered to the borrower or its nominee (ie borrow date):	The dates indicated in Annexure B on which securities were borrowed.
Scheduled date (if any) when the securities are expected to be returned to the borrower or its nominee (ie return date):	Any particular day.
Does the borrower have the right to return the securities early? [Yes/No]	Yes
If yes, in which circumstances?	At any time subject to giving notice.
Does the lender have the right to recall the securities early (ie before the scheduled return date)? [Yes/No]	Yes
If yes, in which circumstances?	At any time subject to giving notice.
Are there circumstances in which the borrower will not be required to return the securities on settlement? [Yes/No]	No
If yes, in which circumstances?	N/A