

Form 605

Corporations Act 2001
Section 671B

Notice of ceasing to be a substantial holder

To Company Name/Scheme ImpediMed Limited

ACN/ARSN 089 705 144

1. Details of substantial holder(1)

Name Starfish Technology Fund 1, LP (Starfish) and each of the persons and entities listed in annexure 1 (Starfish Upstream Entities)

ACN/ARSN (if applicable)

The holder ceased to be a substantial holder on

8 / 02 / 2019

The previous notice was given to the company on

31/ 03 / 2016

The previous notice was dated

31 / 03 / 2016

2. Changes in relevant interests

Particulars of each change in, or change in the nature of, a relevant interest (2) of the substantial holder or an associate (3) 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 (4)	Consideration given in relation to change (5)	Class(6) of securities affected	Number of securities affected	Person's votes affected
28/08/2018	Starfish Technology Fund I	Disposal	0.5203	Ordinary shares	99,787	0.0263%
29/08/2018	Starfish Technology Fund I	Disposal	0.5201	Ordinary shares	50,005	0.0132%
17/09/2018	Starfish Technology Fund I	Disposal	0.5001	Ordinary shares	78,108	0.0206%
18/09/2018	Starfish Technology Fund I	Disposal	0.5000	Ordinary shares	6,944	0.0018%
19/09/2018	Starfish Technology Fund I	Disposal	0.5011	Ordinary shares	22,225	0.0059%
8/10/2018	Starfish Technology Fund I	Disposal	0.4999	Ordinary shares	34,307	0.0091%
19/11/2018	Starfish Technology Fund I	Disposal	0.3316	Ordinary shares	312,930	0.0826%
20/11/2018	Starfish Technology Fund I	Disposal	0.3101	Ordinary shares	100,600	0.0265%
22/11/2018	Starfish Technology Fund I	Disposal	0.3001	Ordinary shares	25,369	0.0067%
23/11/2018	Starfish Technology Fund I	Disposal	0.3000	Ordinary shares	2,514	0.0007%
7/12/2018	Starfish Technology Fund I	Disposal	0.2352	Ordinary shares	227,283	0.0600%
10/12/2018	Starfish Technology Fund I	Disposal	0.2350	Ordinary shares	39,928	0.0105%
30/01/2019	Starfish Technology Fund I	Disposal	0.2426	Ordinary shares	600,000	0.1583%
31/01/2019	Starfish Technology Fund I	Disposal	0.2450	Ordinary shares	50,000	0.0132%

1/02/2019	Starfish Technology Fund I	Disposal	0.2219	Ordinary shares	350,000	0.0924%
4/02/2019	Starfish Technology Fund I	Disposal	0.2250	Ordinary shares	17,342	0.0046%
5/02/2019	Starfish Technology Fund I	Disposal	0.2269	Ordinary shares	808,053	0.2132%
6/02/2019	Starfish Technology Fund I	Disposal	0.2202	Ordinary shares	420,000	0.1108%
7/02/2019	Starfish Technology Fund I	Disposal	0.2257	Ordinary shares	454,605	0.1200%
8/02/2019	Starfish Technology Fund I	Disposal	0.2200	Ordinary shares	3,000,000	0.7916%

3. Changes in association

The persons who have become associates (3) of, ceased to be associates of, or have changed the nature of their association (7) 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
N/A	N/A

4. Addresses

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

Name	Address
Starfish Ventures Pty Ltd	P.O Box 433 East Melbourne, 3002
Michael Panaccio	24 Findon Crescent Kew, 3101
Christiana Panaccio	24 Findon Crescent Kew, 3101
Masto Pty Ltd	24 Findon Crescent Kew, 3101
Micana Super Fund	24 Findon Crescent Kew, 3101
Micana Family Trust	24 Findon Crescent Kew, 3101
John Dyson	P.O Box 433 East Melbourne, 3002
Trudie Horsfall	P.O Box 433 East Melbourne, 3002
Trujon Investment Holdings Pty Ltd	P.O Box 433 East Melbourne, 3002
Trujon Super Fund Trust	P.O Box 433 East Melbourne, 3002
Trujon Family Trust	P.O Box 433 East Melbourne, 3002
Starfish Technology Fund 1 LP	P.O Box 433 East Melbourne, 3002

Signature

print name MICHAEL PANACCIO

capacity

Director of Starfish Ventures Pty Ltd

sign here



11/02 /2019

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 4 of the form.
- (2) See the definition of "relevant interest" in sections 608 and 671B(7) of the Corporations Act 2001.
- (3) See the definition of "associate" in section 9 of the Corporations Act 2001.
- (4) 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.

- (5) 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.
- (6) The voting shares of a company constitute one class unless divided into separate classes.
- (7) Give details, if appropriate, of the present association and any change in that association since the last substantial holding notice.

This is ANNEXURE 1 of 1 page referred to in ASIC Form 605 – Notice of ceasing to be a substantial holder

Name of other substantial holders:

- Starfish Ventures Pty Ltd
- Michael Panaccio
- Micana Family Trust
- John Dyson
- Trudie Horsfall
- Trujon Family Trust

Holder of Relevant Interest	Name of Relevant Interest
Starfish Ventures Pty Ltd (SV)	Power to control disposal and voting of Starfish's ordinary shares as investment manager of Starfish.
Christiana Panaccio	Joint holder of >20% voting power (with Michael Panaccio in SV).
Christiana Panaccio	Joint controller of Mastro Pty Ltd (MPL) as trustee of the Micana Super Fund which beneficially holds 628,091 ordinary shares.
Micana Family Trust	Beneficially entitled to, and power to control, Michael Panaccio's and Christiana Panaccio's holding in SV.
John Dyson	Controller and joint holder of >20% voting power (with Trudie Horsfall) in SV.
John Dyson	Joint controller and holder of >20% voting power in Trujon Investment Holdings Pty Ltd (TIH) which is trustee of Trujon Super Fund which beneficially holds 324,489.

Signature

print name MICHAEL PANACCIO

capacity Director of Starfish Ventures Pty Ltd

sign here



11/ 02/2019

date