

Form 603Corporations Act 2001
Section 671B**Notice of initial substantial holder**To Company Name/Scheme EUREKA GROUP HOLDINGS LTDACN/ARSN 097 241 159**1. Details of substantial holder (1)**Name SEE ANNEXURE 'A' ATTACHED TO THIS FORM

ACN/ARSN (if applicable) _____

The holder became a substantial holder on 25 / 11 / 2016**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 holder became a substantial holder are as follows:

Class of securities (4)	Number of securities	Person's votes (5)	Voting power (6)
SEE ANNEXURE 'B'	12,453,495	12,453,495	5.39%

3. Details of relevant interests

The nature of the relevant interest 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
SEE ANNEXURE 'B'		

4. Details of present registered holders

The persons registered as holders of the securities referred to in paragraph 3 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
SEE ANNEXURE 'B'			

5. Consideration

The consideration paid for each relevant interest referred to in paragraph 3 above, and acquired in the four months prior to the day that the substantial holder became a substantial holder is as follows:

Holder of relevant interest	Date of acquisition	Consideration (9)		Class and number of securities
		Cash	Non-cash	
SEE ANNEXURE 'C'				

6. Associates

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

Name and ACN/ARSN (if applicable)	Nature of association
SEE ANNEXURE 'B'	

7. Addresses

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

Name	Address
SEE ANNEXURE 'D'	



Signature

print name **Christina Seppelt** capacity **Company Secretary**

sign here date **29 / 11 / 2016**

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 by which the relevant interest was acquired. 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.

HUNTER HALL INVESTMENT MANAGEMENT LTD (A.C.N. 063 081 612)
ANNEXURES TO FORM 603
EUREKA GROUP HOLDINGS LTD

ANNEXURE A:

Hunter Hall Investment Management Limited (A.C.N. 063 081 612)
 Hunter Hall International Limited (A.C.N. 059 300 426)
 Hunter Hall Global Value Limited (A.C.N. 107 462 966)
 Hampshire Assets & Services Pty Ltd (A.C.N. 059 790 395) Aubigny Investments Pty Limited (A.C.N. 156 613 026), Zeppelin Investments Pty Ltd (A.C.N. 122 550 369) and Peter James Hall

ANNEXURE B:

Holder of Relevant Interest	Person registered and entitled to be Registered as Holder	Nature of relevant Interest	Class and Number of Shares
Hunter Hall Investment Management Ltd	JP Morgan Chase Bank, N.A. as the Custodian of the Hunter Hall Value Growth Trust, Hunter Hall High Conviction Equities Trust, and Hunter Hall Global Value Limited	Hunter Hall Investment Management Limited has the power to control the vote attached to the securities, and the power to exercise control over the disposal of securities as: <ul style="list-style-type: none"> • Responsible Entity for the Hunter Hall Value Growth Trust (6,857,429 ORD), Hunter Hall Australian Value Trust (417,859 ORD), Hunter Hall Global Deep Green Trust (220,676 ORD), Hunter Hall High Conviction Equities Trust (1,119,288 ORD) and • Investment Manager for Hunter Hall Global Value Limited (3,838,243 ORD) 	12,453,495 ORD
Hunter Hall International Limited	As above	Hunter Hall International Ltd has a relevant interest in the said securities, as it wholly owns Hunter Hall Investment Management Limited.	As above
Hampshire Assets & Services Pty Ltd, Aubigny Investments Pty Limited, Zeppelin Investments Pty Ltd and Peter James Hall (Hampshire Associates)	As above	The Hampshire Associates has a relevant interest in the said securities as they hold approximately 44.64% of issued securities in Hunter Hall International Ltd. Hampshire Assets & Services Pty Limited, Aubigny Investments Pty Limited and Zeppelin Investments Pty Ltd are controlled by Peter James Hall.	As above
Hunter Hall Global Value Limited	As above	Hunter Hall Global Value Limited is managed pursuant to an investment management agreement by Hunter Hall Investment Management Ltd. (3,838,243 ORD)	3,838,243 ORD

ANNEXURE C:

Person whose relevant interest changed:

Hunter Hall Investment Management Limited

Hunter Hall International Limited

Hunter Hall Global Value Limited

Hampshire Assets and Services Pty Ltd, Aubigny Investments Pty Limited, Zeppelin

Investments Pty Ltd and Peter James Hall

Peter James Hall

Date of Change	Nature of Change	No. of Shares Affected	Consideration Given in Relation to Change AUD	Cumulative
			Opening Balance:	0
12-May-16	Purchase	10,684	7,472.17	10,684
12-May-16	Purchase	36,342	25,416.81	47,026
12-May-16	Purchase	152,154	106,413.23	199,180
12-May-16	Purchase	54,335	38,000.73	253,515
12-May-16	Purchase	85,421	59,741.61	338,936
13-May-16	Purchase	1,450	1,021.40	340,386
13-May-16	Purchase	3,233	2,277.36	343,619
13-May-16	Purchase	13,536	9,534.90	357,155
13-May-16	Purchase	7,599	5,352.82	364,754
13-May-16	Purchase	4,335	3,053.61	369,089
16-May-16	Purchase	10,040	7,072.27	379,129
16-May-16	Purchase	15,011	10,573.89	394,140
16-May-16	Purchase	2,952	2,079.42	397,092
16-May-16	Purchase	23,599	16,623.38	420,691
16-May-16	Purchase	42,035	29,609.87	462,726
17-May-16	Purchase	205,590	153,095.06	668,316
17-May-16	Purchase	1,643,803	1,224,077.62	2,312,119
17-May-16	Purchase	1,045,607	778,623.80	3,357,726
16-Jun-16	Purchase	165,000	123,750.00	3,522,726
16-Jun-16	Purchase	305,000	228,750.00	3,827,726
16-Jun-16	Purchase	3,530,000	2,647,500.00	7,357,726
5-Aug-16	Purchase	7,794	5,472.12	7,365,520
5-Aug-16	Purchase	73,661	51,717.05	7,439,181
5-Aug-16	Purchase	126,203	88,606.56	7,565,384
8-Aug-16	Purchase	103,369	72,814.15	7,668,753
8-Aug-16	Purchase	6,420	4,522.31	7,675,173
8-Aug-16	Purchase	60,340	42,504.09	7,735,513
9-Aug-16	Purchase	4,118	2,900.76	7,739,631
9-Aug-16	Purchase	2,580	1,817.38	7,742,211
9-Aug-16	Purchase	1,720	1,211.58	7,743,931
11-Aug-16	Purchase	45,970	32,381.73	7,789,901
11-Aug-16	Purchase	4,930	3,472.74	7,794,831
11-Aug-16	Purchase	78,549	55,330.70	7,873,380
12-Aug-16	Purchase	2,820	1,986.43	7,876,200
12-Aug-16	Purchase	1,500	1,056.62	7,877,700
12-Aug-16	Purchase	4,139	2,915.55	7,881,839
15-Aug-16	Purchase	1,910	1,345.42	7,883,749
15-Aug-16	Purchase	1,450	1,021.41	7,885,199
15-Aug-16	Purchase	3,269	2,302.71	7,888,468

6-Oct-16	Purchase	8,290	5,839.56	7,896,758
6-Oct-16	Purchase	71,740	50,534.37	7,968,498
6-Oct-16	Purchase	125,672	88,524.61	8,094,170
7-Oct-16	Purchase	40,840	28,768.10	8,135,010
7-Oct-16	Purchase	4,700	3,310.73	8,139,710
7-Oct-16	Purchase	71,593	50,430.84	8,211,303
11-Oct-16	Purchase	1,331	937.58	8,212,634
1-Nov-16	Purchase	2,102	1,480.66	8,214,736
1-Nov-16	Purchase	1,510	1,063.66	8,216,246
2-Nov-16	Purchase	2,910	2,049.83	8,219,156
2-Nov-16	Purchase	24,830	17,490.49	8,243,986
2-Nov-16	Purchase	43,509	30,648.18	8,287,495
3-Nov-16	Purchase	4,020	2,831.72	8,291,515
3-Nov-16	Purchase	34,970	24,633.22	8,326,485
3-Nov-16	Purchase	61,268	43,157.79	8,387,753
4-Nov-16	Purchase	214,384	151,014.24	8,602,137
4-Nov-16	Purchase	14,060	9,904.01	8,616,197
4-Nov-16	Purchase	122,200	86,078.90	8,738,397
7-Nov-16	Purchase	35,990	25,348.11	8,774,387
7-Nov-16	Purchase	313,120	220,533.45	9,087,507
7-Nov-16	Purchase	549,958	387,340.75	9,637,465
8-Nov-16	Purchase	1,700	1,197.50	9,639,165
8-Nov-16	Purchase	1,800	1,267.94	9,640,965
9-Nov-16	Purchase	60,140	42,363.21	9,701,105
9-Nov-16	Purchase	6,990	4,923.83	9,708,095
9-Nov-16	Purchase	105,573	74,366.67	9,813,668
22-Nov-16	Purchase	2,630	1,720.27	9,816,298
22-Nov-16	Purchase	23,150	15,142.29	9,839,448
22-Nov-16	Purchase	41,068	26,862.37	9,880,516
23-Nov-16	Purchase	29,080	18,254.37	9,909,596
23-Nov-16	Purchase	260,510	163,529.82	10,170,106
23-Nov-16	Purchase	462,345	290,227.61	10,632,451
25-Nov-16	Purchase	630,830	399,926.67	11,263,281
25-Nov-16	Purchase	70,760	44,859.65	11,334,041
25-Nov-16	Purchase	1,119,454	709,699.14	12,453,495
Balance held as at 25th November 2016				12,453,495
% held as at 25th November 2016 based on shares on issue 231,047,900				5.39 %

ANNEXURE D:

NAME	ADDRESS
Hunter Hall International Limited	Level 2, 56 Pitt Street SYDNEY NSW 2000
Hunter Hall Investment Management Limited	Level 2, 56 Pitt Street SYDNEY NSW 2000
Hunter Hall Global Value Limited	Level 2, 56 Pitt Street SYDNEY NSW 2000
Hampshire Associates	Level 2, 56 Pitt Street SYDNEY NSW 2000

These 4 pages comprise the Annexures A to D referred to in the Form, Notice of Initial Substantial Holder.



Christina Seppelt
Company Secretary
Dated 29/11/2016