Form 603

Corporations Act 2001 Section 671B

Notice of initial substantial holder

To Company Name/Scheme	Alumina Limited
ACN/ARSN	004 820 419
Details of substantial holder (1)	
Name	Vanguard Group (The Vanguard Group, Inc. and its controlled entities including those listed in Annexure A)
ACN/ARSN (if applicable)	N/A
The holder became a substantial holder on	23 December 2019

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)
Ordinary	144,023,118	144,023,118	5.001%

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
Vanguard Group	Vanguard Group is the manager of various Mutual funds and accounts and in that capacity has the power to dispose of the shares. The other members of Vanguard Group have a relevant interest under section 608(3) of the Corporations Act.	Ordinary - 144,023,118

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	Registered holder of	Person entitled to be	Class and
interest	securities	registered as holder (8)	number of
			securities
Vanguard Group	Brown Brothers Harriman	Various funds and other accounts of Vanguard Group	Ordinary 6,703,082
Vanguard Group	BNY Mellon	Various funds and other accounts of Vanguard Group	Ordinary – 7,255,692
Vanguard Group	Citibank	Various funds and other accounts of Vanguard Group	Ordinary 25,855
Vanguard Group	JP Morgan Chase Bank, N.A.	Various funds and other accounts of Vanguard Group	Ordinary – 72,241,017
Vanguard Group	State Street Bank and Trust Company	Various funds and other accounts of Vanguard Group	Ordinary – 20,110,236
Vanguard Group	Various others	Various funds and other accounts of Vanguard Group	Ordinary – 37,687,236

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			
See Annexure A						

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
N/A	N/A

7. Addresses

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

Name	Address
Vanguard Group	P.O. Box 2600, V26 Valley Forge, PA 19482 USA

print name	Shawn Acker	capacity	Compliance Manager
	STAND SCORE		
sign here		date	26 December 2019

DIRECTIONS

- (1) If there are a number of substantial holders with similar or related 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, moneys and other, that any person from whom a relevant interest has 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 of its associate in relation to the acquisitions, even if they are not paid directly to the person from whom the relevant interest was acquired.

To Company ACN/ARSN

Alumina Limited 004 820 419

Substantial Holder Name ACN/ARSN

Vanguard Group

N/A

		Nature of	Consideration given in relation		Number of securities	Person's votes
Date of change	Person whose relevant interest changed	Change(6)	to change(7)	Class	affected	affected
23-Aug-2019	The Vanguard Group, Inc.	BUY	2.12	Ordinary	4,522	4,522
27-Aug-2019	The Vanguard Group, Inc.	SELL	2.16	Ordinary	(17,050)	(17,050)
	The Vanguard Group, Inc.	BUY	2.12	Ordinary	41,250	41,250
2-Sep-2019	The Vanguard Group, Inc.	BUY	2.21	Ordinary	24,275	24,275
6-Sep-2019	The Vanguard Group, Inc.	BUY	2.22	Ordinary	1,528	1,528
	The Vanguard Group, Inc.	SELL	2.26	Ordinary	(564)	(564)
	The Vanguard Group, Inc.	BUY	2.46	Ordinary	7,953	7,953
···········	The Vanguard Group, Inc.	BUY	2.46	Ordinary	4,522	4,522
	The Vanguard Group, Inc.	BUY	2.46	Ordinary	14,781	14,781
	The Vanguard Group, Inc.	SELL	2.46	Ordinary	(12,538)	(12,538)
	The Vanguard Group, Inc.	SELL	2.46	Ordinary	(17,266)	(17,266)
	The Vanguard Group, Inc.	SELL	2.46	Ordinary	(6,413)	(6,413)
	The Vanguard Group, Inc.	BUY	2.40	Ordinary	36,209	36,209
	The Vanguard Group, Inc.	SELL	2.40	Ordinary	(3,231)	(3,231)
	The Vanguard Group, Inc.	BUY	2.37	Ordinary	36,485	36,485
	The Vanguard Group, Inc.	BUY	2.34	Ordinary	13,266	13,266
	The Vanguard Group, Inc.	SELL	2.38	Ordinary	(2,311)	(2,311)
	The Vanguard Group, Inc.	BUY	2.37	Ordinary	3,860	3,860
	The Vanguard Group, Inc.	BUY	2.42	Ordinary	4,837	4,837
	The Vanguard Group, Inc.	BUY	2.35	Ordinary	1,930	1,930
		BUY	2.35	Ordinary	4,522	4,522
	The Vanguard Group, Inc.	BUY	2.31	Ordinary	4,522	4,522
		BUY	2.29	Ordinary	4,522	4,522
		BUY	2.25	Ordinary	14,055	14,055
		BUY	2.21	Ordinary	3,860	3,860
		BUY	2.30	Ordinary	3,860	3,860
		BUY	2.30	Ordinary	1,361	1,361
	The Vanguard Group, Inc.	SELL	2.35	Ordinary	(31,812)	(31,812)
		BUY	2.35	Ordinary	3,704	3,704
		BUY	2.35	Ordinary	6,783	6,783
		BUY	2.34	Ordinary	1,536	1,536
		BUY	2.34	Ordinary	35,849	35,849
		SELL	2.34	Ordinary	(81)	(81)
		BUY	2.28	Ordinary	75,875	75,875
		SELL	2.27	Ordinary	(31,287)	(31,287)
		SELL	2.27	Ordinary	(32,097)	(32,097)
		BUY	2.26	Ordinary	857	857
		BUY	2.31	Ordinary	23,660	23,660
· · · · · · · · · · · · · · · · · · ·		BUY	2.43	Ordinary	4,522	4,522
		BUY	2.42	Ordinary	1,536	1,536
		BUY	2.48	Ordinary	4,522	4,522
		BUY	2.50	Ordinary	5,259	5,259
		BUY	2.47	Ordinary	1,536	1,536
		BUY		Ordinary	5,731	5,731
		BUY	2.39	Ordinary	4,522	4,522
}		BUY	2.39	Ordinary	1,186	1,186
		SELL	2.39	Ordinary	(2,798)	(2,798)
		BUY	2.41	Ordinary	3,235	3,235
		SELL	2.32	Ordinary	(740)	(740)
		BUY	2.32	Ordinary	2,261	2,261
		BUY	2.32	Ordinary	10,306	10,306
		BUY	2.33	Ordinary	1,753	1,753
		BUY	2.33	Ordinary	4,837	4,837
		BUY	2.31	Ordinary	4,522	4,522
	. 7	BUY	2.31	Ordinary	1,536	1,536
		BUY	2.31	Ordinary	1,418	1,418
		BUY	2.30	Ordinary	46,494	46,494
		BUY	2.30	Ordinary	7,008	7,008
		BUY	2.31	Ordinary	1,536	1,536
	7	BUY	2.31	Ordinary	3,072	3,072
		BUY	2.24	Ordinary	47,613	47,613
4-Dec-2019	The Vanguard Group, Inc.	BUY	2.24	Ordinary	639	639

Date of change	Person whose relevant interest changed	Nature of Change(6)	Consideration given in relation to change(7)	Class	Number of securities	
	The Vanguard Group, Inc.	BUY	2.22	Ordinary	43,711	affected 43,711
	The Vanguard Group, Inc.	BUY	2.27	Ordinary	10,345	10,345
	The Vanguard Group, Inc.	BUY	2.26	Ordinary	1,536	1,536
11-Dec-2019	The Vanguard Group, Inc.	BUY	2.30	Ordinary	4,522	4,522
	The Vanguard Group, Inc.	BUY	2.30	Ordinary	4,522	4,522
	The Vanguard Group, Inc.	BUY	2.32	Ordinary	9,501	9,501
	The Vanguard Group, Inc. The Vanguard Group, Inc.	BUY BUY	2.38	Ordinary	3,486	3,486
	The Vanguard Group, Inc.	BUY	2.43	Ordinary Ordinary	4,522 27,211	4,522 27,211
	The Vanguard Group, Inc.	SELL	2.39	Ordinary	(119,113)	(119,113
	The Vanguard Group, Inc.	SELL	2.39	Ordinary	(20,000)	(20,000
20-Dec-2019	The Vanguard Group, Inc.	BUY	2.39	Ordinary	82,652	82,652
~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	The Vanguard Group, Inc.	BUY	2.36	Ordinary	44,506	44,506
	The Vanguard Group, Inc.	BUY	2.36	Ordinary	9,537	9,537
	The Vanguard Group, Inc.	BUY	2.36	Ordinary	4,992	4,992
	Vanguard Investments Australia Ltd. Vanguard Investments Australia Ltd.	BUY	2.16	Ordinary Ordinary	15,763 50,336	15,763
	Vanguard Investments Australia Ltd.	BUY	2.16	Ordinary	893,915	50,336 893,915
	Vanguard Investments Australia Ltd.	BUY	2.13	Ordinary	45,711	45,711
	Vanguard Investments Australia Ltd.	BUY	2.13	Ordinary	52,422	52,422
<del></del>	Vanguard Investments Australia Ltd.	BUY	2.12	Ordinary	13,254	13,254
	Vanguard Investments Australia Ltd.	BUY	2.17	Ordinary	59,587	59,587
	Vanguard Investments Australia Ltd.	BUY	2.21	Ordinary	47,960	47,960
***************************************	Vanguard Investments Australia Ltd.	BUY	2.18	Ordinary	239,907	239,907
•	Vanguard Investments Australia Ltd. Vanguard Investments Australia Ltd.	BUY BUY	2.16	Ordinary	46,951	46,951
	Vanguard Investments Australia Ltd.	BUY	2.16	Ordinary Ordinary	17,712 17,776	17,712 17,776
***************************************	Vanguard Investments Australia Ltd.	BUY	2.19	Ordinary	79,427	79,427
· · · · · · · · · · · · · · · · · · ·		BUY	2,19	Ordinary	74,448	74,448
		BUY	2.24	Ordinary	17,776	17,776
13-Sep-2019	Vanguard Investments Australia Ltd.	SELL	2.45	Ordinary	(4,769)	(4,769
······		BUY	2.40	Ordinary	42,514	42,514
		BUY	2.40	Ordinary	42,275	42,275
	<del>-</del>	BUY BUY	2.41	Ordinary	13,338	13,338
***************************************		SELL	2.46	Ordinary Ordinary	40,650 (29,860)	40,650 (29,860
· · · · ·		BUY	2.46	Ordinary	22,300	22,300
		BUY	2.46	Ordinary	33,330	33,330
25-Sep-2019	Vanguard Investments Australia Ltd.	BUY	2.37	Ordinary	31,220	31,220
		BUY	2.38	Ordinary	31,038	31,038
		BUY	2.38	Ordinary	17,736	17,736
	L., . <del>-</del>	BUY SELL	2.38	Ordinary	26,808	26,808
		BUY	2.37	Ordinary Ordinary	(85,701)	(85,701
		BUY	2.38	Ordinary	47,972 33,951	47,972 33,951
		BUY	2.38	Ordinary	63,448	63,448
2-Oct-2019	Vanguard Investments Australia Ltd.	BUY	2.38	Ordinary	41,743	41,743
		SELL	2.38	Ordinary	(52,728)	(52,728
		BUY	2.33	Ordinary	26,172	26,172
		BUY	2.29	Ordinary	12,155	12,155
		BUY	2.29	Ordinary	42,918	42,918
· · · · · · · · · · · · · · · · · · ·		BUY	2.29	Ordinary Ordinary	37,230 111,847	37,230 111,847
		BUY	2.27	Ordinary	21,805	21,805
		BUY	2.26	Ordinary	72,293	72,293
11-Oct-2019		BUY	2.25	Ordinary	17,416	17,416
		BUY	2.24	Ordinary	325,930	325,930
		BUY	2.21	Ordinary	386,242	386,242
		BUY	2.28	Ordinary	17,444	17,444
		BUY	2.26 2.26	Ordinary	13,083	13,083
		BUY	2.26	Ordinary Ordinary	21,810 44,248	21,810 44,248
	. ~	BUY	2.34	Ordinary	21,920	21,920
		BUY	2.34	Ordinary	42,735	42,735
		BUY	2.28	Ordinary	21,700	21,700
		BUY	2.26	Ordinary	78,109	78,109
	Vanguard Investments Australia Ltd.	BUY	2.26	Ordinary	13,083	13,083
***************************************		BUY	2.26	Ordinary	17,444	17,444

Date of change	Person whose relevant interest changed	Nature of Change(6)	Consideration given in relation to change(7)	Class	Number of securities affected	Person's votes
31-Oct-2019	Vanguard Investments Australia Ltd.	BUY	2.27	Ordinary	51,768	51,768
	Vanguard Investments Australia Ltd.	BUY	2.27	Ordinary	66,893	66,893
	Vanguard Investments Australia Ltd.	SELL	2.27	Ordinary	(25,884)	(25,884
1-Nov-2019	Vanguard Investments Australia Ltd.	SELL	2.29	Ordinary	(307,700)	(307,700
1-Nov-2019	Vanguard Investments Australia Ltd.	SELL	2.29	Ordinary	(44,549)	(44,549
	Vanguard Investments Australia Ltd.	BUY	2.29	Ordinary	17,444	17,444
1-Nov-2019	Vanguard Investments Australia Ltd.	BUY	2.29	Ordinary	13,083	13,083
1-Nov-2019	Vanguard Investments Australia Ltd.	BUY	2.29	Ordinary	30,837	30,837
4-Nov-2019	Vanguard Investments Australia Ltd.	SELL	2.34	Ordinary	(378,520)	(378,520
4-Nov-2019	Vanguard Investments Australia Ltd.	BUY	2.34	Ordinary	63,088	63,088
5-Nov-2019	Vanguard Investments Australia Ltd.	SELL	2.35	Ordinary	(99,398)	(99,398
5-Nov-2019	Vanguard Investments Australia Ltd.	BUY	2.35	Ordinary	17,444	17,444
	Vanguard Investments Australia Ltd.	BUY	2.35	Ordinary	25,764	25,764
	Vanguard Investments Australia Ltd.	BUY	2.40	Ordinary	17,416	17,416
11-Nov-2019	Vanguard Investments Australia Ltd.	BUY	2.45	Ordinary	61,905	61,909
12-Nov-2019	Vanguard Investments Australia Ltd.	SELL	2.44	Ordinary	(16,025)	(16,029
12-Nov-2019	Vanguard Investments Australia Ltd.	BUY	2.44	Ordinary	13,128	13,128
	Vanguard Investments Australia Ltd.	BUY	2.44	Ordinary	23,826	23,826
	Vanguard Investments Australia Ltd.	BUY	2.46	Ordinary	6,492	6,492
14-Nov-2019	Vanguard Investments Australia Ltd.	BUY	2.47	Ordinary	95,528	95,528
	Vanguard Investments Australia Ltd.	BUY	2.48	Ordinary	17,540	17.540
	Vanguard Investments Australia Ltd.	BUY	2.47	Ordinary	28,366	28,366
20-Nov-2019	Vanguard Investments Australia Ltd.	SELL	2.42	Ordinary	(172,560)	(172,560
<del></del>	Vanguard Investments Australia Ltd.	BUY	2.42	Ordinary	15,267	15,26
21-Nov-2019	Vanguard Investments Australia Ltd.	BUY	2.39	Ordinary	17,544	17,544
21-Nov-2019	Vanguard Investments Australia Ltd.	BUY	2.39	Ordinary	45,843	45,84
	Vanguard Investments Australia Ltd.	BUY	2.39	Ordinary	13,158	13,15
22-Nov-2019	Vanguard Investments Australia Ltd.	BUY	2.39	Ordinary	46,607	46,60
	Vanguard Investments Australia Ltd.	BUY	2.41	Ordinary	44,455	44,455
	Vanguard Investments Australia Ltd.	SELL	2.32	Ordinary	(45,036)	(45,036
^^^^	Vanguard Investments Australia Ltd.	BUY	2.33	Ordinary	13,158	13,158
	Vanguard Investments Australia Ltd.	BUY	2.31	Ordinary	26,748	26,748
	Vanguard Investments Australia Ltd.	BUY	2.32	Ordinary	114,092	114.092
	Vanguard Investments Australia Ltd.	BUY	2.31	Ordinary	26,316	26,316
	Vanguard Investments Australia Ltd.	BUY	2.24	Ordinary	21,930	21,930
	Vanguard Investments Australia Ltd.	BUY	2.24	Ordinary	49,500	49,500
· · · · · · · · · · · · · · · · · · ·	Vanguard Investments Australia Ltd.	BUY	2.22	Ordinary	131,326	131,326
	Vanguard Investments Australia Ltd.	BUY	2.27	Ordinary	17,544	17,544
***************************************	Vanguard Investments Australia Ltd.	BUY	2.27	Ordinary	27,096	27,096
	Vanguard Investments Australia Ltd.	BUY	2.30	Ordinary	42,870	42,870
		BUY	2.30	Ordinary	30,973	30,973
	Vanguard Investments Australia Ltd.	SELL	2.31	Ordinary	(7,589)	(7,589
***************************************	Vanguard Investments Australia Ltd.	BUY	2.38	Ordinary	17,544	17,544
	~	BUY	2.38	Ordinary	22,440	22,440
		BUY	2.38	Ordinary	31,416	31,416
~~~~~~~~~~~~	Vanguard Investments Australia Ltd.	SELL	2.37	Ordinary	(205,708)	(205.708
*********	~	BUY	2.39	Ordinary	17,528	17,528
		SELL	2.39	Ordinary	(479,986)	(479,986

This is Annexure A of	3 pages referred to in Form 603. Notice of initial substantial h	nolder.
Signature:	SHADIN SCHOOL	
Name: Shawn Acker		
Capacity: Compliance	• Manager	
Date: 26 December 2	019	