Form 604

Corporations Act 2001 Section 671B

Notice of change of interests of substantial holder

To Company Name/Scheme Spirit Technology Solutions Ltd (ST1)

ACN/ARSN 089 224 402

1. Details of substantial holder (1)

Name Regal Funds Management Pty Ltd (RFM)

ACN/ARSN (if applicable) 107 576 821

There was a change in the interests of the substantial

holder on 18/02/2021
The previous notice was given to the company on 23/12/2020
The previous notice was dated 21/12/2020

2. Previous and present 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 when last required, and when now required, to give a substantial holding notice to the company or scheme, are as follows:

	Previous notice		Current notice		
Class of securities (4)	Person's votes	Voting power (5)	Person's votes	Voting power (5)	
ORDINARY	53,775,040	9.84%	61,396,909	11.22%	

3. 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:

Holder of relevant interest	Date of acquisition	Consideration (9)	Class and number of securities
	See Annexure 1		

4. Present relevant interests

Particulars of each relevant interest of the substantial holder in voting securities after the change are as follows:

Holder of relevant interest	Registered holder of securities	urities Person entitled to be registered as holder (8)		Class and number of securities	Person's votes
UBS AG, AUSTRALIA BRANCH	UBS NOMINEES PTY LTD	UBS AG, AUSTRALIA BRANCH	HOLDER OF SHARES	38,589,713 ORDINARY	38,589,713
MORGAN STANLEY & CO INTL PLC	HSBC CUSTODY NOMINEES (AUSTRALIA) LIMITED A/C 2	MORGAN STANLEY & CO INTL PLC	HOLDER OF SHARES	784,067 ORDINARY	784,067
MERRILL LYNCH INTERNATIONAL LIMITED	MERRILL LYNCH (AUS) NOMINEES PTY LTD	MERRILL LYNCH INTERNATIONAL LIMITED	HOLDER OF SHARES	3,514,729 ORDINARY	3,514,729
CREDIT SUISSE AG	CS THIRD NOMINEES PTY LIMITED	CREDIT SUISSE AG	HOLDER OF SHARES	18,508,400 ORDINARY	18,508,400

5. Changes in association

The persons who have become associates (2) of, ceased to be associates of, or have changed the nature of their association (9) 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		
NOT APPLICABLE			

6. Addresses

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

Name	Address		
PHILIP KING	LEVEL 47 GATEWAY 1 MACQUARIE PLACE SYDNEY		
PHILIP KING	NSW 2000		

Signature				
	print name	Kenny Ho	capacity	Company Secretary
	sign here	Kenny	date	22/02/2021

Annexure 1

Changes in relevant interests

Date	Person whose relevant interest changed	Nature of Change	Consideration given in relation to change	Number of securities affected	Class of securities	Persons votes affected
19/01/2021	Regal Funds Management	Buy	573534.38	1509301	Ordinary	1509301
27/01/2021	Regal Funds Management	Sell	42500.00	100000	Ordinary	100000
15/02/2021	Regal Funds Management	Buy	1473052.88	3981224	Ordinary	3981224
18/02/2021	Regal Funds Management	Buy	836754.00	2231344	Ordinary	2231344