Form 604

Corporations Act 2001 Section 671B

Notice of change of interests of substantial holder

To Company Name/Scheme Insignia Financial Ltd

ACN/ARSN 100 103 722

1. Details of substantial holder (1)

Name Australian Retirement Trust Pty LTD ATF Australian Retirement Trust

ACN/ARSN (if applicable) 010 720 840

There was a change in the interests of the

substantial holder on $\frac{11}{09}/\frac{2023}{2023}$ The previous notice was given to the company on $\frac{13}{09}/\frac{2023}{2023}$ The previous notice was dated $\frac{12}{12}/\frac{2023}{2023}$

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:

Class of securities (4)	Previous notice		Present notice		
	Person's votes	Voting power (5)	Person's votes	Voting power (5)	
Fully paid ordinary shares	39,643,238 6.021%		46,726,259	7.052%	

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:

Date of change	Person whose relevant interest changed	Nature of change (6)	Consideration given in relation to change (7)	Class and number of securities affected	Person's votes affected
Refer to					
Annexure					
A					

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	Person entitled to be registered as holder (8)	Nature of relevant interest (6)	Class and number of securities	Person's votes
Australian Retirement Trust Pty LTD ATF Australian Retirement Trust	HSBC Custody Nominees (Australia) Ltd		Power to exercise voting rights pursuant to position held as trustee of a	Fully paid ordinary shares 46,726,259	46,726,259

		superannuation fund	

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
Australian Retirement Trust Pty LTD ATF Australian Retirement Trust	266 George Street, Brisbane, QLD 4000

Signature

print name	Angus Herron	Tobias Claesson	capacity	Authorised Signatory

sign here

Musterion of g date 13/09/2023

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 6 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 person's votes divided by the total votes in the body corporate or scheme multiplied by 100.
- (6) 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.

(7) 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.

- (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) Give details, if appropriate, of the present association and any change in that association since the last substantial holding notice.

Annexure A

Holder of Relevant Interest	Purchase/Sale	Trade Date	Consideration (Cash)	Consideration (Non-Cash)	Number of Securities
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	09/12/2022	19,450.36	(NOII-Ousil)	5,882
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	12/12/2022	1,179,283.10		362,504
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	12/12/2022	269,956.03		81,998
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	12/12/2022	154,358.94		46,677
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	16/12/2022	425,766.39		124,460
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	19/12/2022 19/12/2022	5,012.89 783,954.53		1,513 229,273
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	20/12/2022	1,627.09		487
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	20/12/2022	592,624.30		174,896
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	06/01/2023	2,416.03		698
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	09/01/2023	390,863.97		113,003
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	13/01/2023	2,518.11		692
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	18/01/2023	553,035.75		150,264
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	25/01/2023 27/01/2023	10,530.24 295,934.24		3,000 82,606
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	30/01/2023	817,868.80		236,848
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	31/01/2023	851,563.27		244,023
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	31/01/2023	6,546.19		1,895
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	02/02/2023	2,391.63		692
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	23/02/2023	16,680.24		5,000
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	27/02/2023	522,031.56		156,214
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	28/02/2023	260,429.32	ļ	78,107
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	01/03/2023	128,941.77 129,098.77	 	39,054 39,053
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	02/03/2023 09/03/2023	159,098.77	+	48,932
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	16/03/2023	10,034.97		3,500
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	17/03/2023	1,619,233.02		567,037
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	23/03/2023	11,758.89		4,208
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	27/03/2023	20,114.88		7,288
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	27/03/2023	176,137.68		63,818
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	29/03/2023	4,174.99		1,500
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	31/03/2023	276,033.96		100,182
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL BUY	31/03/2023 03/04/2023	1,206,176.55 954,705.85		437,762 340,723
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	03/04/2023	163,191.28		58,241
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	03/04/2023	149,324.18		53,292
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	03/04/2023	122,677.16		43,782
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	03/04/2023	5,466.70		1,951
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	03/04/2023	416,494.88		148,642
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	03/04/2023	707,628.28		252,544
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL SELL	03/04/2023 03/04/2023	1,610,975.21		589,265
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	04/04/2023	368,673.60 738,296.16		134,854 270,282
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	04/04/2023	168,958.98		61,854
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	05/04/2023	2,799.99		1,000
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	05/04/2023	2,024,095.81		735,438
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	05/04/2023	463,217.11		168,306
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	05/04/2023	847,173.12		307,501
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	05/04/2023	193,876.66		70,372
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	06/04/2023	932,263.29		337,068
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL SELL	06/04/2023 11/04/2023	213,348.42 341,057.59		77,138 123,333
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	11/04/2023	821,429.43		297,564
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	11/04/2023	187,985.45		68,098
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	11/04/2023	475,397.49		171,711
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	12/04/2023	85,645.14		31,070
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	12/04/2023	374,244.76	ļ	135,767
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	12/04/2023	201,103.97	1	72,748
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL SELL	13/04/2023 13/04/2023	427,251.72 491,974.21		153,750 177,404
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	13/04/2023	112,588.56		40,599
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	13/04/2023	97,777.42	<u> </u>	35,186
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	13/04/2023	396,705.51		142,562
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	14/04/2023	430,900.82		155,091
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	14/04/2023	1,882,873.56		677,689
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	14/04/2023	375,520.27		134,644
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	14/04/2023	188,006.10	1	67,012
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL SELL	17/04/2023 17/04/2023	586,885.66 2,564,457.59	 	206,727 903,315
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	17/04/2023	410,795.44	+	144,434
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	19/04/2023	167,748.27		57,531
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	19/04/2023	402,023.22		136,619
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	20/04/2023	795,357.29		267,949
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	21/04/2023	222,265.58		74,463
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	21/04/2023	361,245.22		120,876

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Australian Retirement Trust Pp Lid ATF Australian Retirement Troat SELL 69/05/2023 114,527.10 57.05 Australian Retirement Trust Pp Lid ATF Australian Retirement Trust SELL 16/05/2023 216,719.14 70.45 Australian Retirement Trust Pp Lid ATF Australian Retirement Trust SELL 16/05/2023 216,719.14 70.45 Australian Retirement Trust Pp Lid ATF Australian Retirement Trust SELL 25/05/2023 216,719.14 70.45 Australian Retirement Trust Pp Lid ATF Australian Retirement Trust SELL 25/05/2023 2.007.99 7.7 Australian Retirement Trust Pp Lid ATF Australian Retirement Trust SELL 25/05/2023 2.007.99 7.7 Australian Retirement Trust Pp Lid ATF Australian Retirement Trust SELL 25/05/2023 2.007.99 7.7 Australian Retirement Trust Pp Lid ATF Australian Retirement Trust SELL 25/05/2023 257,397.75 70.55 Australian Retirement Trust Pp Lid ATF Australian Retirement Trust SELL 25/05/2023 257,397.75 70.55 Australian Retirement Trust Pp Lid ATF Australian Retirement Trust SELL 25/05/2023 25/05/202	Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	08/05/2023	39,543.00	13,181
Australian Retirement Trust Py List ATF Australian Retirement Trust Australian Retirement Trust Py List ATF Australian Retir	Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	08/05/2023	221,059.34	74,743
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Australian Reterment Trust Py List ATT Australian Reterment Trust By List ATT Australian Reterment Trust Py List ATT Australian Reterment Trust By List ATT Australian Reter	Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	16/05/2023	216,719.41	70,456
Rustralian Retirement Trust Py List ATF Australian Retirement Trust But V	Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	25/05/2023	14,338.26	5,000
Australian Retirement Trust Py List ATF Australian Retirement Trust BUY 16/06/2023 597;397.75 205;95 205;85	Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	01/06/2023	2,007.99	700
Australian Referement Trust Pty List ATF Australian Retirement Trust Bty 1 16/06/2023 133,933.54.53 45,55 Australian Referement Trust Pty List ATF Australian Retirement Trust Bty 2 20/06/2023 1839,979.22 65,55 Australian Referement Trust Pty List ATF Australian Retirement Trust Bty	Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	15/06/2023	244,525.00	86,609
Australian Retirement Trust Py List ATF Australian Retirement Trust BUY 15/06/2023 139,355.33 45,55 Australian Retirement Trust Py List ATF Australian Retirement Trust BUY 20/06/2023 189,979.32 65,55 Australian Retirement Trust Py List ATF Australian Retirement Trust BUY 20/06/2023 189,979.32 65,55 Australian Retirement Trust Py List ATF Australian Retirement Trust BUY 22/06/2023 191,403.88 65,55 Australian Retirement Trust Py List ATF Australian Retirement Trust BUY 22/06/2023 191,403.88 65,55 Australian Retirement Trust Py List ATF Australian Retirement Trust BUY 22/06/2023 191,403.88 65,55 Australian Retirement Trust Py List ATF Australian Retirement Trust BUY 23/06/2023 207,1919.56 72,11 Australian Retirement Trust Py List ATF Australian Retirement Trust SELL 25/06/2023 207,1919.56 72,15 Australian Retirement Trust Py List ATF Australian Retirement Trust BUY 27/06/2023 81,928.86 28,84 Australian Retirement Trust Py List ATF Australian Retirement Trust BUY 27/06/2023 81,928.86 28,84 Australian Retirement Trust Py List ATF Australian Retirement Trust BUY 30/06/2023 8,329.99 3,00 Australian Retirement Trust Py List ATF Australian Retirement Trust BUY 30/06/2023 8,329.99 3,00 Australian Retirement Trust Py List ATF Australian Retirement Trust BUY 30/06/2023 8,329.99 3,00 Australian Retirement Trust Py List ATF Australian Retirement Trust BUY 30/06/2023 8,329.99 3,00 Australian Retirement Trust Py List ATF Australian Retirement Trust BUY 30/07/2023 6,003.93 3,003.93	Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	16/06/2023	597,397.75	205,957
Australian Retirement Trust Py List ATF Australian Retirement Trust Australian Retirement Trust Py List ATF Australian Retirement Trust BUY 21/06/2023 189,3973.23 65,55 Australian Retirement Trust Py List ATF Australian Retirement Trust BUY 21/06/2023 199,074.70 65,55 Australian Retirement Trust Py List ATF Australian Retirement Trust BUY 21/06/2023 191,043.68 65,55 Australian Retirement Trust Py List ATF Australian Retirement Trust BUY 22/06/2023 191,043.68 65,55 Australian Retirement Trust Py List ATF Australian Retirement Trust BUY 23/06/2023 192,519.55 65,55 Australian Retirement Trust Py List ATF Australian Retirement Trust BUY 23/06/2023 207,199.55 65,55 Australian Retirement Trust Py List ATF Australian Retirement Trust BUY 23/06/2023 16,6116.20 57,66 Australian Retirement Trust Py List ATF Australian Retirement Trust BUY 26/06/2023 16,6116.20 57,66 Australian Retirement Trust Py List ATF Australian Retirement Trust BUY 26/06/2023 18,122.88 62,82,84 Australian Retirement Trust Py List ATF Australian Retirement Trust BUY 28/06/2023 81,929.93 63,00 Australian Retirement Trust Py List ATF Australian Retirement Trust BUY 28/06/2023 8,329.93 63,00 Australian Retirement Trust Py List ATF Australian Retirement Trust BUY 30/06/2023 8,329.93 63,00 Australian Retirement Trust Py List ATF Australian Retirement Trust BUY 30/06/2023 5,379.99 63,00 Australian Retirement Trust Py List ATF Australian Retirement Trust BUY 30/06/2023 5,793.99 63,00 Australian Retirement Trust Py List ATF Australian Retirement Trust BUY 31/07/2023 5,579.396 62,02 Australian Retirement Trust Py List ATF Australian Retirement Trust BUY 41/07/2023 5,579.396 62,02 Australian Retirement Trust Py List ATF Australian Retirement Trust BUY 41/07/2023 5,579.396 62,02 Australian Retirement Trust Py List ATF Australian Retirement Trust BUY 41/07/2023 5,588.91 62,589.59 62,689.59 62,689.69 63,689.69 63,689.69 63,689.69 63,689.69 63,689.69 63,689.69 63,689.69 63,689.69 63,689.69 63,689.69 63,689.69 63,689.69 63,689.69 63,689.69 63,689.69 63,689.69 63,68	-	BUY	16/06/2023	139,836.53	48,501
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Australian Retirement Trust Py Ltd ATF Australian Retirement Trust BUY 22/06/2023 193,403.68 65,55 65,55 65,55 63,55	Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	20/06/2023	189,979.32	65,567
Australian Retirement Trust Py Ltd ATF Australian Retirement Trust BUY 22/06/2023 193,403.68 65,55 65,55 65,55 63,55	•			· · · · · · · · · · · · · · · · · · ·	65,567
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Australian Retirement Trust Py, Ltd ATF Australian Retirement Trust BUY 27/06/2023 83,292.86 8,28.86 8,2	-	SELL	26/06/2023	207,199.56	72,157
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Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	05/09/2023	3,198.87	1,225
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	05/09/2023	6,201.62	2,380
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	06/09/2023	3,103.99	1,200
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	06/09/2023	38,432.39	15,000
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	06/09/2023	87,416.94	33,292
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	07/09/2023	268,813.09	103,561
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	08/09/2023	1,143,994.47	443,708
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	11/09/2023	1,458,600.56	581,544
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	11/09/2023	663,894.89	266,110
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	11/09/2023	831,300.01	332,922
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	11/09/2023	1,917,976.78	765,721
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	12/09/2023	823,559.22	332,922