

**Form 603**Corporations Act 2001  
Section 671B**Notice of initial substantial holder**To Company Name/Scheme **ORORA LIMITED**ACN/ARSN **004 275 165****1. Details of substantial holder (1)**Name **Australian Retirement Trust Pty LTD ATF Australian Retirement Trust**ACN/ARSN (if applicable) **010 720 840**The holder became a substantial holder on **11/09/2024****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)
<b>Fully paid ordinary shares</b>	<b>67,425,553</b>	<b>67,425,553</b>	<b>5.019%</b>

**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
<b>Australian Retirement Trust Pty LTD ATF Australian Retirement Trust</b>	<b>Power to exercise voting rights pursuant to position held as trustee of a superannuation fund.</b>	<b>Fully paid ordinary shares 67,425,553</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
<b>Australian Retirement Trust Pty LTD ATF Australian Retirement Trust</b>	<b>HSBC Custody Nominees (Australia) Limited</b>		<b>Fully paid ordinary shares 67,425,553</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	
<b>Refer to Annexure A</b>				

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## 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

## 7. Addresses

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

Name	Address
<b>Australian Retirement Trust Pty LTD ATF Australian Retirement Trust</b>	266 George Street, Brisbane City QLD 4000

## Signature

print name **Yaozhi Pan** **Steven Moggian** capacity **Authorised Signatory**

sign here *Yaozhi Pan* *SMoggian* date **13/09/2024**

## 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.

**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	SELL	18/03/2024	282.96		139
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	18/03/2024	508,288.00		231,040
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	26/03/2024	508,288.00		231,040
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	24/04/2024	8,044.16		3,700
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	26/04/2024	1,723.90		790
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	26/04/2024	86,031.35		40,534
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	26/04/2024	11,703.75		5,656
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	30/04/2024	6,303.05		3,020
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	30/04/2024	1,242,562.12		588,892
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	1/05/2024	1,199,105.46		579,278
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	2/05/2024	818,813.59		400,433
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	3/05/2024	1,031,836.34		504,381
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	3/05/2024	1,209,741.90		590,118
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	6/05/2024	5,269.45		2,560
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	9/05/2024	1,033,981.05		504,381
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	9/05/2024	28,138.65		14,100
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	10/05/2024	1,883.85		960
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	13/05/2024	1,108,729.21		574,082
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	13/05/2024	978,122.99		503,711
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	15/05/2024	667,186.91		339,802
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	16/05/2024	989,792.12		503,711
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	16/05/2024	14,227,392.96		7,185,552
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	22/05/2024	14,227,392.96		7,185,552
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	27/05/2024	100,328.40		51,150
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	31/05/2024	876,044.30		449,414
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	3/06/2024	2,072,325.04		1,049,722
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	4/06/2024	123,270.84		62,258
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	4/06/2024	178,956.36		90,382
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	7/06/2024	67,969.39		34,360
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	13/06/2024	2,031,515.53		1,062,452
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	17/06/2024	3,066.55		1,600
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	17/06/2024	2,061,156.88		1,062,452
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	24/06/2024	758,874.65		391,819
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	24/06/2024	13,080.65		6,590
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	25/06/2024	23,026.36		11,885
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	17/07/2024	1,326,012.01		694,304
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	17/07/2024	2,877.75		1,500
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	18/03/2024	21,544.11		11,076
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	18/03/2024	1,556,103.82		778,967
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	26/03/2024	1,945,354.64		979,000
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	24/04/2024	21,027.76		10,552
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	26/04/2024	2,700,210.13		1,357,855
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	26/04/2024	950,387.37		478,732
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	26/04/2024	2,457,179.93		1,200,000
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	30/04/2024	1,422,633.18		700,000
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	30/04/2024	3,001,281.89		1,463,145
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	1/05/2024	1,501.05		725
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	2/05/2024	1,797,751.95		864,318
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	3/05/2024	2,374,200.09		1,145,601
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	3/05/2024	1,156,430.57		559,923
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	6/05/2024	3,490,411.97		1,690,081
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	9/05/2024	830,923.93		408,911
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	9/05/2024	2,242,983.73		1,100,000
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	10/05/2024	398,522.16		195,354
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	13/05/2024	20,032.25		9,756
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	13/05/2024	1,786,342.98		874,937
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	15/05/2024	398,522.16		195,354
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	16/05/2024	2,047,594.82		1,000,000
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	16/05/2024	386,813.30		188,754
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	22/05/2024	925,671.44		451,721
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	27/05/2024	1,952,193.78		980,392
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	31/05/2024	9,946.45		5,000
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	3/06/2024	1,472,168.12		736,309
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	4/06/2024	1,553,089.30		800,000
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	4/06/2024	1,546,595.04		800,000
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	7/06/2024	741,607.38		385,840
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	13/06/2024	1,933,243.80		1,000,000
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	17/06/2024	1,839,172.94		960,804
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	17/06/2024	2,815,888.79		1,470,974
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	24/06/2024	80,923.60		36,065
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	24/06/2024	3,393,617.75		1,505,200
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	25/06/2024	596,325.86		247,383
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	17/07/2024	1,095,735.32		452,534
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	17/07/2024	1,792,500.00		750,000
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	18/03/2024	3,780,951.95		1,543,007
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	18/03/2024	1,673,605.59		682,131
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	26/03/2024	499,600.88		202,488

**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	24/04/2024	1,712,559.96		678,899
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	26/04/2024	22,660.38		9,128
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	26/04/2024	378,512.03		151,178
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	26/04/2024	716,249.69		287,391
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	30/04/2024	1,865,344.00		755,200
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	30/04/2024	2,967.45		1,200
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	1/05/2024	317,645.08		128,538
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	2/05/2024	1,585,039.83		660,288
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	3/05/2024	1,784,009.60		729,854
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	3/05/2024	6,855.13		2,803
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	6/05/2024	1,725,648.09		700,000
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	9/05/2024	71,628.11		29,257
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	9/05/2024	1,489,890.56		600,000
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	10/05/2024	104,075.49		41,906
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	13/05/2024	23,587.07		9,524
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	13/05/2024	1,048,841.87		419,059
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	15/05/2024	41,050.84		16,734
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	16/05/2024	41,614.81		16,728
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	16/05/2024	74,112.96		29,850
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	22/05/2024	2,107,996.63		844,398
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	27/05/2024	1,263,590.19		506,155
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	31/05/2024	2,319.38		885
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	3/06/2024	1,997,678.46		735,424
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	4/06/2024	2,037,272.16		750,000
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	4/06/2024	1,984,356.00		750,000
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	7/06/2024	1,945,788.05		735,423
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	13/06/2024	538,358.85		202,194
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	17/06/2024	594,629.98		223,720
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	17/06/2024	1,703,517.82		648,767
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	24/06/2024	116,644.38		45,211
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	24/06/2024	1,765,044.57		681,782