Form 603

Corporations Act 2001 Section 671B

Notice of initial substantial holder

To Company Name/Scheme Atrum Coal Ltd (ATU)

ACN/ARSN 153 876 861

1. Details of substantial holder (1)

Name Regal Funds Management Pty Ltd (RFM)

ACN/ARSN (if applicable) 107 576 821

The holder became a substantial holder on 26/03/2021

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	30,982,261	30,982,261	5.33%

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
REGAL FUNDS MANAGEMENT PTY LIMITED	REGAL FUNDS MANAGEMENT PTY LIMITED HAS A RELEVANT INTEREST IN ITS CAPACITY AS INVESTMENT MANAGER AND/OR TRUSTEE	30,982,261 ORDINARY

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)	Nature of relevant interest (6)	Class and number of securities	Person's votes
UBS AG, AUSTRALIA BRANCH	UBS NOMINEES PTY LTD	UBS AG, AUSTRALIA BRANCH	HOLDER OF SHARES	6,007,193 ORDINARY	6,007,193
MORGAN STANLEY & CO INTL PLC	HSBC CUSTODY NOMINEES (AUSTRALIA) LIMITED A/C 2	MORGAN STANLEY & CO INTL PLC	HOLDER OF SHARES	126,291 ORDINARY	126,291
MERRILL LYNCH INTERNATIONAL LIMITED	MERRILL LYNCH (AUS) NOMINEES PTY LTD	MERRILL LYNCH INTERNATIONAL LIMITED	HOLDER OF SHARES	4,181,459 ORDINARY	4,181,459
CREDIT SUISSE AG	CS THIRD NOMINEES PTY LIMITED	CREDIT SUISSE AG	HOLDER OF SHARES	20,667,318 ORDINARY	20,667,318

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 1				

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
NOT APPLICABLE	

7. Addresses

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

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

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print name Philip King capacity Director

sign here 30/03/2021

Annexure 1

Consideration

Date	Person whose relevant interest changed	Nature of Change	Considerati on given in relation to change	Number of securities affected	Class of securities	Persons votes affected
27/11/2020	Regal Funds Management	Buy	18524.28	62162	Ordinary	62162
30/11/2020	Regal Funds Management	Buy	15998.31	53812	Ordinary	53812
1/12/2020	Regal Funds Management	Buy	10790.50	36878	Ordinary	36878
2/12/2020	Regal Funds Management	Buy	2670.11	8723	Ordinary	8723
3/12/2020	Regal Funds Management	Buy	25199.93	81951	Ordinary	81951
9/12/2020	Regal Funds Management	Buy	1940.16	6289	Ordinary	6289
21/12/2020	Regal Funds Management	Buy	629674.50	2098915	Ordinary	2098915
26/03/2021	Regal Funds Management	Buy	794057.49	12216269	Ordinary	12216269