Form 603

Corporations Act 2001 Section 671B

Notice of initial substantial holder

To Company Name/Scheme Sandfire Resources Limited

ACN/ARSN 105 154 185

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 $\frac{17}{11}/\frac{2022}{2022}$

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)	
Fully paid ordinary shares	21,578,890	21,578,890	5.142%	

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	
Australian Retirement Trust Pty LTD ATF Australian Retirement Trust	Power to exercise voting rights pursuant to position held as trustee of a superannuation fund.	Fully paid ordinary shares 21,578,890	

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
Australian Retirement Trust Pty LTD ATF Australian Retirement Trust	HSBC Custody Nominees (Australia)Limited		Fully paid ordinary shares 21,578,890

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	
Refer to 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

7. Addresses

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

Name	Address
Australian Retirement Trust Pty LTD ATF Australian Retirement Trust	30 Little Cribb Street, Milton QLD 4064

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print name	Angus Herron	Tobias Claesson	capacity	Authorised Signatory	
sign here	Andleron	1-16	date	21/11/2022	

sign here

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.

DIRECTIONS

- See the definition of "associate" in section 9 of the Corporations Act 2001.
- See the definition of "relevant interest" in sections 608 and 671B(7) of the Corporations Act 2001.
- The voting shares of a company constitute one class unless divided into separate classes.
- 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.
- The person's votes divided by the total votes in the body corporate or scheme multiplied by 100.
- Include details of:
 - 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
 - any qualification of the power of a person to exercise, control the exercise of, or influence the exercise of, the voting powers or (b) 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.

- 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".
- 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	Consideration (Non-	Number of
			(Cash)	Cash)	Securities
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	15/07/2022 18/07/2022	7,137.61 11,663.42		1,812.00 3,020.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	19/07/2022	1,822.49		500.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	25/07/2022	4,921.77		1,160.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	28/07/2022	3,174.19		751.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	01/08/2022	3,123,354.98		734,612.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	02/08/2022	9,603,342.65		2,112,948.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	11/08/2022	5,019.71		1,033.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	19/08/2022			2,500.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	24/08/2022	·		38,351.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL SELL	25/08/2022 26/08/2022	- 258,598.40 - 176,482.55		58,112.00 39,659.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	30/08/2022	4,909.99		1,000.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	30/08/2022			35,523.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	31/08/2022	4,739.09		1,000.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	01/09/2022	21,706.29		4,761.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	05/09/2022	15,019.96		3,593.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	06/09/2022	7,459.94		1,914.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	07/09/2022	4,744.99		1,250.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	07/09/2022	- 115,361.80		25,924.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	07/09/2022			5,181.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY SELL	08/09/2022	2,019.25 - 155,572.00		522.00 34,960.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	08/09/2022	- 155,572.00		900.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	09/09/2022	5,017.03		1,329.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	09/09/2022			43,446.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	12/09/2022	3,869.99		1,000.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	12/09/2022	- 16,833.53		3,800.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	12/09/2022	- 103,280.05		23,209.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	14/09/2022	10,050.59		2,290.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	15/09/2022	- 35,420.61		8,000.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	20/09/2022	15,328.69		3,835.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL SELL		- 1,078,341.80		242,324.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	23/09/2022	- 13,265.07 - 13,999.06		3,000.00 3,166.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	27/09/2022	5,018.64		1,285.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	27/09/2022			999.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	28/09/2022	4,447.97		1,200.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	29/09/2022	18,730.24		5,000.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	04/10/2022	- 4.43		1.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	05/10/2022	6,832.67		1,880.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	07/10/2022	7,966.00		1,914.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	10/10/2022	9,954.79		2,435.00 1,340.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	13/10/2022	5,018.19 - 6,350.66		1,340.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	14/10/2022			8,878.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	17/10/2022			6,500.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	18/10/2022	18,093.62		4,793.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	19/10/2022	52,477.08		14,338.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	19/10/2022	1,844.99		500.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	19/10/2022			2,200.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	24/10/2022	19,330.72		5,486.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	25/10/2022	48,355.92		14,507.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL BUY	31/10/2022 02/11/2022	- 3,302.50 5,017.27		768.00 1,436.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	02/11/2022			119,761.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	04/11/2022	14,379.52		3,830.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	04/11/2022			915.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	08/11/2022	3,667.79		1,000.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	09/11/2022	9,432.61		2,438.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	10/11/2022	3,099.99		800.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	10/11/2022			2,750.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	11/11/2022			800.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	14/11/2022			1,815.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	15/11/2022 16/11/2022	20,448.21 19,610.99		4,650.00 4,175.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	16/11/2022			1,000.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	17/11/2022			1,000.00
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	07/09/2022	566,337.06		146,543
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	20/09/2022	389,976.70		99,866
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	28/09/2022	83,102.53		22,738
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	28/09/2022	622,573.51		171,178
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	04/10/2022	715,805.98		192,621
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	07/10/2022	802,248.73		194,631

Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	SELL	20/10/2022	553,443.05	146,514
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	17/11/2022	492,843.05	102,692
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	17/11/2022	5,235,963.52	1,050,567
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	17/11/2022	3,657,915.42	751,299
Australian Retirement Trust Pty Ltd ATF Australian Retirement Trust	BUY	17/11/2022	3,480,534.72	700,378