

Form 603Corporations Act 2001
Section 671B**Notice of initial substantial holder****To Company Name**

ORCODA LIMITED

ACN

009 065 650

1. Details of the substantial holder (1)**Name**

CAMERON RICHARD PTY LTD

ACN/ARSN (if applicable)

059 654 223

The holder became a substantial holder on 19 / 04 / 2023**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	8,685,294	8,685,294	5.20%

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
CAMERON RICHARD PTY LTD atf CAMERON RICHARD SUPERANNUATION FUND	Registered holder	8,685,294 ordinary shares

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
CAMERON RICHARD PTY LTD atf CAMERON RICHARD SUPERANNUATION FUND	CAMERON RICHARD PTY LTD atf CAMERON RICHARD SUPERANNUATION FUND	Director	8,685,294 ordinary shares

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	
CAMERON RICHARD PTY LTD atf CAMERON RICHARD SUPERANNUATION FUND	See Appendix A	See Appendix A	See Appendix A	See Appendix 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
N/A	

7. Addresses

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

Name	Address
CAMERON RICHARD PTY LTD	8 Hardwicke Street Balwyn VIC 3103

Signature

Print name: Peter Jones

Capacity: Director

Sign here:



Date: 20 April 2023

Appendix A

Date	Transaction	# of shares	Price per share	Consideration
2/11/2022	Buy	8,273	\$0.08	\$661.84
4/11/2022	Buy	525	\$0.08	\$42.00
9/11/2022	Buy	40,000	\$0.09	\$3,600.00
9/11/2022	Buy	160,000	\$0.09	\$14,400.00
9/11/2022	Buy	80,137	\$0.09	\$7,212.33
9/11/2022	Buy	119,863	\$0.09	\$10,787.67
9/11/2022	Buy	180,137	\$0.09	\$16,212.33
14/11/2022	Buy	173,320	\$0.09	\$15,598.80
28/11/2022	Buy	8,000	\$0.10	\$800.00
28/11/2022	Buy	4,060	\$0.10	\$406.00
28/11/2022	Buy	37,940	\$0.10	\$3,794.00
28/11/2022	Buy	7,060	\$0.10	\$706.00
29/11/2022	Buy	12,500	\$0.11	\$1,375.00
29/11/2022	Buy	80,440	\$0.11	\$8,848.40
29/11/2022	Buy	100,000	\$0.11	\$11,000.00
30/11/2022	Buy	34,400	\$0.11	\$3,784.00
30/11/2022	Buy	65,600	\$0.11	\$7,216.00
1/12/2022	Buy	34,400	\$0.11	\$3,784.00
1/12/2022	Buy	49,600	\$0.11	\$5,456.00
9/12/2022	Buy	60,557	\$0.10	\$6,055.70
9/12/2022	Buy	55,000	\$0.10	\$5,500.00
9/12/2022	Buy	35,000	\$0.10	\$3,500.00
9/12/2022	Buy	48,333	\$0.10	\$4,833.30
9/12/2022	Buy	50,000	\$0.10	\$5,000.00
12/12/2022	Buy	1,667	\$0.10	\$166.70
12/12/2022	Buy	8,333	\$0.10	\$833.30
12/12/2022	Buy	1,000	\$0.10	\$100.00
12/12/2022	Buy	100	\$0.10	\$10.00
12/12/2022	Buy	10	\$0.10	\$1.00
12/12/2022	Buy	1	\$0.10	\$0.10
13/12/2022	Buy	190,556	\$0.10	\$19,055.60
13/12/2022	Buy	9,444	\$0.10	\$944.40
14/12/2022	Buy	77,813	\$0.10	\$7,781.30
14/12/2022	Buy	200,000	\$0.10	\$20,000.00
15/12/2022	Buy	66,666	\$0.11	\$7,333.26
15/12/2022	Buy	40,000	\$0.11	\$4,400.00
16/12/2022	Buy	406,077	\$0.11	\$44,668.47
16/12/2022	Buy	157,837	\$0.11	\$17,362.07
16/12/2022	Buy	36,086	\$0.11	\$3,969.46
22/12/2022	Buy	14,800	\$0.12	\$1,776.00
22/12/2022	Buy	344,465	\$0.12	\$41,335.80
23/12/2022	Buy	54,540	\$0.12	\$6,544.80
23/12/2022	Buy	100,000	\$0.12	\$12,000.00
23/12/2022	Buy	64,959	\$0.12	\$7,795.08
28/12/2022	Sell	-	\$0.13	-\$2,985.32
28/12/2022	Sell	-	\$0.13	-\$487.50

Date	Transaction		# of shares	Price per share	Consideration
28/12/2022	Sell	-	2,447	\$0.13	-\$318.11
28/12/2022	Sell	-	4,852	\$0.13	-\$630.76
28/12/2022	Buy		800,000	\$0.12	\$96,000.00
29/12/2022	Buy		128,805	\$0.12	\$15,456.60
29/12/2022	Buy		266,584	\$0.12	\$31,990.08
29/12/2022	Buy		1,195	\$0.12	\$143.40
3/01/2023	Buy		30,884	\$0.12	\$3,706.08
4/01/2023	Buy		142,109	\$0.12	\$17,053.08
5/01/2023	Buy		67,646	\$0.13	\$8,793.98
5/01/2023	Buy		23,978	\$0.13	\$3,117.14
13/01/2023	Buy		40,000	\$0.13	\$5,200.00
13/01/2023	Buy		1,816	\$0.13	\$236.08
16/01/2023	Buy		10,000	\$0.13	\$1,300.00
16/01/2023	Buy		19,240	\$0.14	\$2,693.60
18/01/2023	Buy		11,230	\$0.14	\$1,572.20
19/01/2023	Buy		217,714	\$0.14	\$30,479.96
19/01/2023	Buy		82,286	\$0.14	\$11,520.04
19/01/2023	Buy		117,714	\$0.14	\$16,479.96
19/01/2023	Buy		82,286	\$0.14	\$11,520.04
25/01/2023	Buy		147,524	\$0.14	\$20,653.36
25/01/2023	Buy		16,800	\$0.14	\$2,352.00
21/02/2023	Buy		2,654	\$0.15	\$398.10
21/02/2023	Buy		14,700	\$0.15	\$2,205.00
21/02/2023	Buy		9,646	\$0.15	\$1,446.90
23/02/2023	Buy		40,000	\$0.15	\$6,000.00
24/02/2023	Placement		2,083,333	\$0.12	\$249,999.96
24/02/2023	Buy		174	\$0.15	\$26.10
24/02/2023	Buy		35,000	\$0.15	\$5,250.00
27/02/2023	Buy		60,000	\$0.14	\$8,400.00
27/02/2023	Buy		43,200	\$0.14	\$6,048.00
27/02/2023	Buy		7,295	\$0.14	\$1,021.30
27/02/2023	Buy		24,505	\$0.13	\$3,185.65
27/02/2023	Buy		12,055	\$0.14	\$1,687.70
1/03/2023	Buy		19,582	\$0.14	\$2,741.48
1/03/2023	Buy		15,000	\$0.14	\$2,100.00
21/03/2023	Buy		30,000	\$0.14	\$4,200.00
21/03/2023	Buy		23,479	\$0.14	\$3,287.06
21/03/2023	Buy		31,402	\$0.14	\$4,396.28
21/03/2023	Buy		6,521	\$0.14	\$912.94
21/03/2023	Buy		15,556	\$0.14	\$2,177.84
21/03/2023	Buy		52,727	\$0.14	\$7,381.78
21/03/2023	Buy		2,807	\$0.14	\$392.98
22/03/2023	Buy		198,915	\$0.14	\$27,848.10
22/03/2023	Buy		17,858	\$0.14	\$2,500.12
22/03/2023	Buy		12,000	\$0.14	\$1,680.00
22/03/2023	Buy		2,142	\$0.14	\$299.88

Date	Transaction	# of shares	Price per share	Consideration
22/03/2023	Buy	7,858	\$0.14	\$1,100.12
22/03/2023	Buy	10,000	\$0.14	\$1,400.00
22/03/2023	Buy	10,000	\$0.14	\$1,400.00
22/03/2023	Buy	149	\$0.14	\$20.86
23/03/2023	Buy	10,000	\$0.14	\$1,400.00
23/03/2023	Buy	11,993	\$0.14	\$1,679.02
24/03/2023	Buy	8,236	\$0.14	\$1,153.04
18/04/2023	Buy	13,210	\$0.17	\$2,245.70
19/04/2023	Buy	22,096	\$0.19	\$4,198.24
19/04/2023	Buy	42,744	\$0.19	\$8,121.36
19/04/2023	Buy	330	\$0.19	\$62.70
19/04/2023	Buy	3,040	\$0.19	\$577.60
19/04/2023	Buy	22,096	\$0.19	\$4,198.24
19/04/2023	Buy	9,694	\$0.19	\$1,841.86
19/04/2023	Buy	19,657	\$0.19	\$3,734.83
19/04/2023	Buy	7	\$0.19	\$1.33
19/04/2023	Buy	40,847	\$0.19	\$7,760.93
19/04/2023	Buy	18,168	\$0.19	\$3,451.92
19/04/2023	Buy	21,321	\$0.19	\$4,050.99
19/04/2023	Buy	100,000	\$0.19	\$19,000.00
19/04/2023	Buy	100,000	\$0.19	\$19,000.00
19/04/2023	Buy	54,860	\$0.19	\$10,423.40
19/04/2023	Buy	5,140	\$0.19	\$976.60
	TOTAL	8,685,294		