

Form 603

Corporations Act 2001
Section 671B

Notice of initial substantial holder

To: Company Name/Scheme	Primewest Group Limited Primewest Property Fund
ACN/ARSN	Primewest Group Limited ACN 636 344 137 Primewest Property Fund ARSN 636 405 635

1. Details of substantial holder (1)

Name	Pentek Holdings Pty Ltd atf the J Litis Investment Trust No 2, James Litis and each other body corporate controlled by James Litis
ACN/ARSN (if applicable)	
The holder became a substantial holder on	8 November 2019

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)
Stapled securities	225,395,041	225,395,041	64.56%

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
Pentek Holdings Pty Ltd atf the J Litis Investment Trust No 2 and James Litis	Pentek Holdings Pty atf the J Litis Investment Trust No 2 has a relevant interest because it is the registered holder of securities under s608(1)(a). James Litis has a relevant interest in the same securities under s608(3)(b) because he controls Pentek Holdings Pty Ltd atf the J Litis Investment Trust No 2	69,477,604 stapled securities in Primewest Group Limited and Primewest Property Fund (" Stapled Securities ")
James Litis Pentek Holdings Pty Ltd and James Litis	Pentek Holdings Pty Ltd has a relevant interest because it is the registered holder of securities under s608(1)(a). James Litis has a relevant interest in the same securities under s608(3)(b) because he controls Pentek Holdings Pty Ltd.	684,868 Stapled Securities
James Litis Pentek Holdings Pty Ltd atf the J Litis Investment Trust No 2 Pentek Holdings Pty Ltd Alltop Holdings Pty Ltd atf the Litis Provision for Family Trust Chamor Pty Ltd atf J & I Litis Investment Trust	Deemed relevant interest under section 608(3) of the Corporations Act in stapled securities which Primewest Group Limited and Primewest Management Ltd as responsible entity for Primewest Property Fund has a relevant interest under section 608(1)(c) of the Corporations Act. Details of the nature of the relevant interest Primewest Group Limited and Primewest Management Ltd as responsible entity for Primewest Property Fund has in these stapled securities is described in a form 603 notice of initial substantial holder lodged by Primewest Group Limited and	223,644,357 Stapled Securities (which includes 69,711,260 of the Stapled Securities referred to in the rows of this table above as Pentek Holdings Pty Ltd atf the J Litis Investment Trust No 2 and Pentek Holdings Pty Ltd have entered into voluntary escrow arrangements with Primewest Group Limited and Primewest Management Ltd as responsible entity for Primewest Property Fund in respect of the shares referred to in the rows above).

<p>E & D Litis Pty Ltd</p> <p>Evangelos Litis Nominees Pty Ltd atf the Evangelos Litis Family Trust</p> <p>Litis Property Pty Ltd atf the JDE Litis Superannuation Fund</p> <p>Litis Super Pty Ltd atf the JDE Litis Superannuation Fund</p> <p>Mountview Corporation Pty Ltd atf the Litis And Somas Family Trust</p> <p>Raincove Holdings Pty Ltd atf the J Litis Investment Trust No 3</p> <p>Southshore Investments Pty Ltd atf the Evangelos Litis Family Trust No 2</p>	<p>Primewest Management Ltd as responsible entity for Primewest Property Fund with ASX on 8 November 2019.</p>	
<p>Alltop Holdings Pty Ltd atf the Litis Provision for Family Trust and James Litis</p>	<p>Alltop Holdings Pty Ltd atf the Litis Provision for Family Trust and James Litis has a relevant interest because it is the registered holder of securities under s608(1)(a).</p> <p>James Litis has a relevant interest in the same securities under s608(3)(b) because he exerts practical control of Alltop Holdings Pty Ltd atf the Litis Provision for Family Trust and James Litis</p>	144,862 Stapled Securities
<p>Chamor Pty Ltd atf J & I Litis Investment Trust and James Litis</p>	<p>Chamor Pty Ltd atf J & I Litis Investment Trust has a relevant interest because it is the registered holder of securities under s608(1)(a).</p> <p>James Litis has a relevant interest in the same securities under s608(3)(b) because he controls Chamor Pty Ltd atf J & I Litis Investment Trust</p>	178,799 Stapled Securities
<p>E & D Litis Pty Ltd and James Litis</p>	<p>E & D Litis Pty Ltd has a relevant interest because it is the registered holder of securities under s608(1)(a).</p> <p>James Litis has a relevant interest in the same securities under s608(3)(b) because he exerts practical control of E & D Litis Pty Ltd</p>	108,933 Stapled Securities
<p>Evangelos Litis Nominees Pty Ltd atf the Evangelos Litis Family Trust and James Litis</p>	<p>Evangelos Litis Nominees Pty Ltd atf the Evangelos Litis Family Trust has a relevant interest because it is the registered holder of securities under s608(1)(a).</p> <p>James Litis has a relevant interest in the same securities under s608(3)(b) because he exerts practical control of Evangelos Litis Nominees Pty Ltd atf the Evangelos Litis Family Trust</p>	483,737 Stapled Securities
<p>Litis Property Pty Ltd atf the JDE Litis Superannuation Fund and James Litis</p>	<p>Litis Property Pty Ltd atf the JDE Litis Superannuation Fund has a relevant interest because it is the registered holder of securities under s608(1)(a).</p> <p>James Litis has a relevant interest in the same securities under s608(3)(b) because he controls Litis Property Pty Ltd atf the JDE Litis Superannuation Fund</p>	28,741 Stapled Securities
<p>Litis Super Pty Ltd atf the JDE Litis Superannuation Fund and James Litis</p>	<p>Litis Super Pty Ltd atf the JDE Litis Superannuation Fund has a relevant interest because it is the registered holder of securities under s608(1)(a).</p> <p>James Litis has a relevant interest in the same securities under s608(3)(b) because he controls Litis Super Pty Ltd atf the JDE Litis Superannuation Fund</p>	11,708 Stapled Securities
<p>Mountview Corporation Pty Ltd</p>	<p>Mountview Corporation Pty Ltd has a relevant</p>	149,898 Stapled Securities

atf the Litis And Somas Family Trust and James Litis	<p>interest because it is the registered holder of securities under s608(1)(a) as trustee for the Litis And Somas Family Trust.</p> <p>James Litis has a relevant interest in the same securities under s608(3)(a) because his voting power in Mountview Corporation Pty Ltd atf the Litis And Somas Family Trust is above 20%</p>	
Raincove Holdings Pty Ltd atf the J Litis Investment Trust No 3 and James Litis	<p>Raincove Holdings Pty Ltd atf the J Litis Investment Trust No 3 has a relevant interest because it is the registered holder of securities under s608(1)(a).</p> <p>James Litis has a relevant interest in the same securities under s608(3)(b) because he controls Raincove Holdings Pty Ltd atf the J Litis Investment Trust No 3</p>	56,557 Stapled Securities
Southshore Investments Pty Ltd atf the Evangelos Litis Family Trust No 2 and James Litis	<p>Southshore Investments Pty Ltd atf the Evangelos Litis Family Trust No 2 has a relevant interest because it is the registered holder of securities under s608(1)(a).</p> <p>James Litis has a relevant interest in the same securities under s608(3)(b) because he exerts practical control of Southshore Investments Pty Ltd atf the Evangelos Litis Family Trust No 2</p>	136,237 Stapled Securities

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
Pentek Holdings Pty Ltd atf the J Litis Investment Trust No 2 and James Litis	Pentek Holdings Pty Ltd atf the J Litis Investment Trust No 2	Pentek Holdings Pty Ltd atf the J Litis Investment Trust No 2	69,477,604 Stapled Securities
Pentek Holdings Pty Ltd and James Litis	Pentek Holdings Pty Ltd	Pentek Holdings Pty Ltd	684,868 Stapled Securities
<p>James Litis</p> <p>Pentek Holdings Pty Ltd atf the J Litis Investment Trust No 2</p> <p>Pentek Holdings Pty Ltd</p> <p>Alltop Holdings Pty Ltd atf the Litis Provision for Family Trust</p> <p>Chamor Pty Ltd atf J & I Litis Investment Trust</p> <p>E & D Litis Pty Ltd</p> <p>Evangelos Litis Nominees Pty Ltd atf the Evangelos Litis Family Trust</p> <p>Litis Property Pty Ltd atf the JDE Litis Superannuation Fund</p> <p>Litis Super Pty Ltd atf the JDE Litis Superannuation Fund</p> <p>Mountview Corporation Pty Ltd atf the Litis And Somas Family Trust</p> <p>Raincove Holdings Pty Ltd atf the J Litis Investment Trust No 3</p> <p>Southshore Investments Pty Ltd atf the Evangelos Litis Family</p>	Those holders listed in Annexure "A"	Those holders listed in Annexure "A"	223,644,357 Stapled Securities (which includes 69,711,260 of the Stapled Securities referred to in the rows of this table above as Pentek Holdings Pty Ltd atf the J Litis Investment Trust No 2 and Pentek Holdings Pty Ltd have entered into voluntary escrow arrangements with Primewest Group Limited and Primewest Management Ltd as responsible entity for Primewest Property Fund in respect of the shares referred to in the rows above).

Trust No 2			
Alltop Holdings Pty Ltd atf the Litis Provision for Family Trust and James Litis	Alltop Holdings Pty Ltd atf the Litis Provision for Family Trust	Alltop Holdings Pty Ltd atf the Litis Provision for Family Trust	144,862 Stapled Securities
Chamor Pty Ltd atf J & I Litis Investment Trust and James Litis	Chamor Pty Ltd atf J & I Litis Investment Trust	Chamor Pty Ltd atf J & I Litis Investment Trust	178,799 Stapled Securities
E & D Litis Pty Ltd and James Litis	E & D Litis Pty Ltd	E & D Litis Pty Ltd	108,933 Stapled Securities
Evangelos Litis Nominees Pty Ltd atf the Evangelos Litis Family Trust	Evangelos Litis Nominees Pty Ltd atf the Evangelos Litis Family Trust	Evangelos Litis Nominees Pty Ltd atf the Evangelos Litis Family Trust	483,737 Stapled Securities
Litis Property Pty Ltd atf the JDE Litis Superannuation Fund and James Litis	Litis Property Pty Ltd atf the JDE Litis Superannuation Fund	Litis Property Pty Ltd atf the JDE Litis Superannuation Fund	28,741 Stapled Securities
Litis Super Pty Ltd atf the JDE Litis Superannuation Fund and James Litis	Litis Super Pty Ltd atf the JDE Litis Superannuation Fund	Litis Super Pty Ltd atf the JDE Litis Superannuation Fund	11,708 Stapled Securities
Mountview Corporation Pty Ltd atf the Litis And Somas Family Trust and James Litis	Mountview Corporation Pty Ltd atf the Litis And Somas Family Trust	Mountview Corporation Pty Ltd atf the Litis And Somas Family Trust	149,898 Stapled Securities
Raincove Holdings Pty Ltd atf the J Litis Investment Trust No 3 and James Litis	Raincove Holdings Pty Ltd atf the J Litis Investment Trust No 3	Raincove Holdings Pty Ltd atf the J Litis Investment Trust No 3	56,557 Stapled Securities
Southshore Investments Pty Ltd atf the Evangelos Litis Family Trust No 2 and James Litis	Southshore Investments Pty Ltd atf the Evangelos Litis Family Trust No 2	Southshore Investments Pty Ltd atf the Evangelos Litis Family Trust No 2	136,237 Stapled Securities

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
N/A	N/A	N/A	N/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
Pentek Holdings Pty Ltd atf the J Litis Investment Trust No 2	Associate of James Litis under s12(2)(c) as a consequence of James Litis controlling Pentek Holdings Pty Ltd atf the J Litis Investment Trust No 2
Pentek Holdings Pty Ltd	Associate of James Litis under s12(2)(c) as a consequence of James Litis controlling Pentek Holdings Pty Ltd
Alltop Holdings Pty Ltd atf the Litis Provision for Family Trust	Associate of James Litis under s12(2)(c) as a consequence of James Litis controlling Alltop Holdings Pty Ltd atf the Litis Provision for Family Trust
Chamor Pty Ltd atf J & I Litis Investment Trust	Associate of James Litis under s12(2)(c) as a consequence of James Litis controlling Chamor Pty Ltd atf J & I Litis Investment Trust
E & D Litis Pty Ltd	Associate of James Litis under s12(2)(c) as a consequence of James Litis controlling E & D Litis Pty Ltd
Evangelos Litis Nominees Pty Ltd atf the Evangelos Litis Family Trust	Associate of James Litis under s12(2)(c) as a consequence of James Litis controlling Evangelos Litis Nominees Pty Ltd atf the Evangelos Litis Family Trust
Litis Property Pty Ltd atf the JDE Litis Superannuation Fund	Associate of James Litis under s12(2)(c) as a consequence of James Litis controlling Litis Property Pty Ltd atf the JDE Litis Superannuation Fund
Litis Super Pty Ltd atf the JDE Litis Superannuation Fund	Associate of James Litis under s12(2)(c) as a consequence of James Litis controlling Litis Super Pty Ltd atf the JDE Litis Superannuation Fund
Mountview Corporation Pty Ltd atf the Litis And Somas Family Trust	Associate of James Litis under s12(2)(c) as a consequence of James Litis controlling Mountview Corporation Pty Ltd atf the Litis And Somas Family Trust
Raincove Holdings Pty Ltd atf the J Litis Investment Trust No 3	Associate of James Litis under s12(2)(c) as a consequence of James Litis controlling Raincove Holdings Pty Ltd atf the J Litis Investment Trust No 3
Southshore Investments Pty Ltd atf the Evangelos Litis Family Trust No 2	Associate of James Litis under s12(2)(c) as a consequence of James Litis controlling Southshore Investments Pty Ltd atf the Evangelos Litis Family Trust No 2

7. Addresses

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

Name	Address
James Litis	4A Majestic Close, Applecross WA 6153
Pentek Holdings Pty Ltd atf the J Litis Investment Trust No 2	Care of Macri Partners, Suite 2, 137 Burswood Road, Burswood WA 6100
Pentek Holdings Pty Ltd	As above
Alltop Holdings Pty Ltd atf the Litis Provision for Family Trust	As above
Chamor Pty Ltd atf J & I Litis Investment Trust	As above
E & D Litis Pty Ltd	As above
Evangelos Litis Nominees Pty Ltd atf the Evangelos Litis Family Trust	As above
Litis Property Pty Ltd atf the JDE Litis Superannuation Fund	As above
Litis Super Pty Ltd atf the JDE Litis Superannuation Fund	As above
Mountview Corporation Pty Ltd atf the Litis And Somas Family Trust	As above
Raincove Holdings Pty Ltd atf the J Litis Investment Trust No 3	As above
Southshore Investments Pty Ltd atf the Evangelos Litis Family Trust No 2	As above

Signature

print name **JAMES EVANGELOŠ LITIS**

capacity

DIRECTOR

sign here



Date **8 November 2019**

Primewest Group Limited ACN 636 344 137

**Primewest Management Ltd ACN 091 415 833 as responsible entity of
Primewest Property Fund ARSN 636 405 635
Annexure "A"**

This is Annexure "A" of 2 pages referred to in the Form 603 (Notice of Initial Substantial Holder),
signed by me and dated **8 November 2019**

Director

JAMES EVANGELOS LITIS

Registered holder of securities

Pentek Holdings Pty Ltd ACN 080 088 231 as trustee for the J Litis Investment Trust No 2
Pentek Holdings Pty Ltd ACN 080 088 231
Adam Peter O'Donoghue and Jane Miranda Kirkby as trustee for The Fenton Trust
Circlestar Pty Ltd ACN 615 542 446 as trustee for the David Schwartz Family Holdings Trust
Alet Investments Pty Ltd ACN 100 903 302
Sharecor Pty Ltd ACN 129 172 194
Topsfield Pty Ltd ACN 008 896 366 as trustee for the JB Investment Trust
Two Tops Pty Ltd ACN 106 780 714
Elm Investments (WA) Pty Ltd ACN 078 261 855 as trustee for the J&T Lodge Family Trust
Nisbet Pty Ltd ACN 613 195 207 as trustee for the J&T Lodge Superannuation Fund
Tazamina Astone
Bryan Wallace
Jamie Gordon
Vince Mcquillen
Valerie Maguire
Sue Park
Matthew Pears
Sarah Jacobs
Connor Morrison
Agi Marton
Sian Eleri Mainwaring
Sarah Sorensen
Joel Lithgo
Helen Silva
Jadene Mulroney
Daniel Miskiewicz
Jorrit Muller
Jake Warman
Jemma Hutchinson
Linda Hardman
Ryan Pinto
Iris Marcos-Robson

Gabrielle Lower
Todd Doepel
Will Johns
David Creasy
Jason Smith
Grace Bailey