fax message

To Australian Securities Exchange

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Telephone 64 4 816 5743 or Fax 64 4 816 7642 or e-mail investmentscompliance@acc.co.nz

Attention Company Announcements

Fax No. **0800 449 707**

From Matthew Cunliffe

Date 16 July 2015

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message

To whom it may concern

Attached are two 1% move notices for *Tower Limited*, we have submitted the following substantial shareholding notices to the NZX and Tower Limited today.

Regards

Matthew Cunliffe Investments Compliance Officer

Disclosure of movement of 1% or more in substantial holding or change in nature of relevant interest or both

Sections 277 and 278, Financial Markets Conduct Act 2013

To NZX Limited

and

To Tower Limited

Relevant event being disclosed: Movement of 1% or more

Date of relevant event: 15 July 2015

Date this disclosure made: 16 July 2015

Date last disclosure made: 17 April 2015

Substantial product holder(s) giving disclosure

Full Name(s): Accident Compensation Corporation ("ACC")

Nicholas Bagnall, Guy Elliffe, Paul Robertshawe, Blair Tallott, Blair Cooper, Jason Familton

Summary of substantial holding

Class of quoted voting products: Ordinary Shares (TWR)

Summary for: Accident Compensation Corporation ("ACC")

Nicholas Bagnall, Guy Elliffe, Paul Robertshawe, Blair Tallott, Blair Cooper, Jason Familton

For this disclosure,—

(a) Total number held in class: 12,004,388

(b) Total in class: 174,659,041

(c) Total percentage held in class: 6.873%

For last disclosure,-

(a) Total number held in class: 13,969,659

(b) Total in class: 175,749,449

(c) Total percentage held in class: 7.949%

Details of transactions and events giving rise to relevant event

Details of the transactions or other events requiring disclosure:

On-market sales of 450,000 shares for net consideration of NZD \$976,500.00 on 15th July 2015.

Details after relevant event

Details for ACC

Nature of relevant interest(s):

Beneficial owner of securities under §235(1)(b) of the Financial Markets Conduct Act No relevant agreement document needs to be attached under regulation 139.

For that relevant interest,-

(a) Number held in class: 12,004,388

(b) Percentage held in class: 6.873%

(c) Current registered holder(s): ACC via New Zealand Central Securities Depository Limited (NZCSD)

(d) Registered holder(s) once transfers are registered: unknown

Details for Nicholas Bagnall, Guy Elliffe, Paul Robertshawe, Blair Tallott, Blair Cooper, Jason Familton

Nature of relevant interest(s):

Qualified powers to exercise control of rights to vote and/or of acquisition or disposal of some or all of the financial products, of which the Accident Compensation Corporation ("ACC") is the beneficial owner under §235(1)(c)and 235(1)(d) of the Financial Markets Conduct Act. Further to regulation 139(2)(b), the material terms of this arrangement are that powers are subject to ACC investment policies and the decisions of the ACC Investment Committee.

For that relevant interest,

- (a) Number held in class: 12,004,388
- (b) Percentage held in class: 6.873%
- (c) Current registered holder(s): ACC via New Zealand Central Securities Depository Limited (NZCSD)
- (d) Registered holder(s) once transfers are registered: unknown

For a derivative relevant interest, also--

- (a) type of derivative: n/a
- (b) details of derivative: n/a
- (c) parties to the derivative: n/a
- (d) if the substantial product holder is not a party to the derivative, the nature of the relevant interest in the derivative; n/a

Additional information

Address of substantial product holder(s):

ACC: Justice Centre, 19 Aitken Street, PO Box 242, Wellington, NZ

Contact details: Matthew Cunliffe +64 4 816 5743 investmentscompliance@acc.co.nz

Nature of connection between substantial product holders: Nicholas Bagnall, Guy Elliffe, Paul Robertshawe, Blair Tallott, Blair Cooper and Jason Familton are employees and portfolio managers or equity analysts or corporate governance manager for ACC. Under current ACC investment policies, they have the discretion to exercise control over some or all the rights to vote and acquisition or disposal of some or all of the financial products of which ACC is the beneficial owner.

Name of any other person believed to have given, or believed to be required to give, a disclosure under the Financial Markets Conduct Act 2013 in relation to the financial products to which this disclosure relates: n/a

Certification

I, Matthew Cunliffe, certify that, to the best of my knowledge and belief, the information contained in this disclosure is correct and that I am duly authorised to make this disclosure by all persons for whom It is made.

Disclosure of movement of 1% or more in substantial holding or change in nature of relevant interest or both

Sections 277 and 278, Financial Markets Conduct Act 2013

To NZX Limited

and

To Tower Limited

Relevant event being disclosed: Movement of 1% or more

Date of relevant event: 15 July 2015

Date this disclosure made: 16 July 2015 Date last disclosure made: 17 April 2015

Substantial product holder(s) giving disclosure

Full Name(s): Paul Robertshawe Summary of substantial holding

Class of quoted voting products: Ordinary Shares (TWR)

Summary for: Paul Robertshawe

For this disclosure.—

Total number held in class: (a)

12,039,388

Total in class: (b)

174,659,041

Total percentage held in class: 6.893%

For last disclosure,—

Total number held in class: (a)

14,004,659

Total in class: (b)

175,749,449

Total percentage held in class: 7.969%

Details of the transactions or other events requiring disclosure:

Details of transactions and events giving rise to relevant event

On-market sales of 450,000 shares by ACC for net consideration of NZD \$976,500.00 on 15th July 2015, and the aggregation of interests in financial products held by Paul Robertshawe and ACC.

Details after relevant event

Details for Paul Robertshawe

Nature of relevant interest(s):

Beneficial owner of securities under §235(1)(b) of the Financial Markets Conduct Act No relevant agreement document needs to be attached under regulation 139.

For that relevant interest.-

Number held in class: 35.000 (a)

Percentage held in class: 0.20% (b)

Current registered holder(s): Paul Robertshawe, either directly or indirectly (¢)

Registered holder(s) once transfers are registered: unknown (d)

Nature of relevant interest(s):

Qualified powers to exercise control of rights to vote and/or of acquisition or disposal of some or all of the financial products, of which the Accident Compensation Corporation ("ACC") is the beneficial owner under §235(1)(c)and 235(1)(d) of the Financial Markets Conduct Act. Further to regulation 139(2)(b), the material terms of this arrangement are that powers are subject to ACC investment policies and the decisions of the ACC Investment Committee.

For that relevant interest,

- (a) Number held in class: 12,004,388
- (b) Percentage held in class: 6.873%
- (c) Current registered holder(s): ACC via New Zealand Central Securities Depository Limited (NZCSD)
- (d) Registered holder(s) once transfers are registered: unknown

For a derivative relevant interest, also-

- (a) type of derivative: n/a
- (b) details of derivative: n/a
- (c) parties to the derivative: n/a
- (d) If the substantial product holder is not a party to the derivative, the nature of the relevant interest in the derivative; n/a

Additional Information

Address of substantial product holder(s):

ACC: Justice Centre, 19 Aitken Street, PO Box 242, Wellington, NZ

Contact details: Matthew Cunliffe +64 4 816 5743 investmentscompliance@acc.co.nz

Nature of connection between substantial product holders: Paul Robertshawe is an employee and portfolio manager for ACC. Under current ACC investment policies, he has the discretion to exercise control over some or all the rights to vote and acquisition or disposal of some or all of the financial products of which ACC is the beneficial owner.

Name of any other person believed to have given, or believed to be required to give, a disclosure under the Financial Markets Conduct Act 2013 in relation to the financial products to which this disclosure relates: n/a

Certification

I, Matthew Cunliffe, certify that, to the best of my knowledge and belief, the information contained in this disclosure is correct and that I am duly authorised to make this disclosure by all persons for whom it is made.