

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:

Date of relevant event: 23 October 2019

Date this disclosure made: 25 October 2019

Date last disclosure made: 1 April 2019

Substantial product holder(s) giving disclosure

Full name(s): Salt Funds Management Limited

Summary of substantial holding

Class of quoted voting products: Tower Limited Ordinary Shares (TWR)

Summary for **Salt Funds Management Limited**

For **this** disclosure,—

- (a) total number held in class: 61,476,815
- (b) total in class: 421,647,258
- (c) total percentage held in class: 14.580%

For **last** disclosure,—

- (a) total number held in class: 45,223,493
- (b) total in class: 337,324,300
- (c) total percentage held in class: 13.407%

Details of transactions and events giving rise to relevant event

Salt Funds Management participated in the 1:4 rights issue purchasing a total of 11,969,648 shares for consideration of \$6,703,002.88 and participated in the sub-underwriting purchasing a total of 1,628,567 shares for consideration of \$911,997.52. In addition, Salt Funds Management undertook the following transactions as part of normal on-market trading activities:

Transaction Type	Period	Shares/Units	Consideration
On-market purchases	29/03/19 – 25/09/19	5,069,585	\$(3,597,534.90)
On-market sales	30/04/19 – 16/09/19	-2,414,478	\$1,849,396.23
		2,655,107	

Details after relevant event

Details for Salt Funds Management Limited

Nature of relevant interest(s): **Investment Manager**

For that relevant interest,—

- (a) total number held in class: 61,476,815
- (b) total in class: 421,647,258
- (c) total percentage held in class: 14.580%
- (d) registered holder(s) once transfers are registered: See Annexure 1.

Additional information

Address(es) of substantial product holder(s): Level 3, The Imperial Buildings, 44 Queen Street, Auckland 1050

Contact details:

Kate Allen, Telephone: 09 869 2933, Email: kate.allen@saltfunds.co.nz

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: Not applicable.

Certification

I, Kate Allen, 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.

ANNEXURE 1

SUBSTANTIAL SECURITY HOLDER NOTICE FROM SALT FUNDS MANAGEMENT LTD

DATED 25 October 2019

Name of type of shares	Tower Limited Ordinary Shares
Percentage held	14.580%

Registered holder:	Guardian Nominees No.2 Ltd (as custodian for BT Funds Management (NZ) Ltd)
Holding:	26,926,426 (6.386%)
Registered holder:	National Nominees Ltd (as custodian for Salt Investment Funds Ltd)
Holding:	16,142,340 (3.828%)
Registered holder:	Trustees Executors Limited (as custodian for TGH Equities Ltd)
Holding:	1,655,335 (0.393%)
Registered holder:	BNP Paribas Nominees (NZ) Ltd (as custodian for AMP Capital Investors (New Zealand) Ltd)
Holding:	16,752,714 (3.973%)