

Sydney

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11 October 2021

The Manager
Company Announcements Office
ASX Limited
20 Bridge Street
SYDNEY NSW 2000

By electronic lodgement

Dear Sir/Madam

Re: Notice of change of interests of substantial holder – Santos Limited (STO)

We attach a notice of change of interests of substantial holder in Santos Limited. This notice is given by Challenger Limited and each of its associated entities named in Annexure 2 to this notice.

Yours faithfully



Linda Matthews
Company Secretary

Melbourne Level 19, 31 Queen Street PO Box 297, Flinders Lane, Melbourne VIC 3000 Telephone 02 9994 7000 Facsimile 02 9994 7777
Brisbane Level 6, 215 Adelaide Street, Brisbane QLD 4000 Telephone 07 3136 5400 Facsimile 07 3136 5407
Perth Level 26, 140 St Georges Terrace, Perth WA 6000 Telephone 08 6466 9613
Adelaide Level 7, Suite 714, 147 Pirie Street, Adelaide SA 5000 Telephone 08 8427 9511

Challenger Limited ABN 85 106 842 371 Challenger Group Services Pty Limited ABN 91 085 657 307
Challenger Life Company Limited ABN 44 072 486 938 AFSL 234670
Challenger Investment Partners Limited ABN 29 092 382 842 AFSL 234 678
Challenger Retirement and Investment Services Limited ABN 80 115 534 453 AFSL295642 RSE Licence No. L0001304
Challenger Mortgage Management Pty Ltd ABN 72 087 271 109 Challenger Securitisation Management Pty Ltd ABN 56 100 346 898 AFSL 244593
Challenger Investment Solutions Management Pty Ltd ABN 63 130 035 353 AFSL 487354

Form 604Corporations Act 2001
Section 671B**Notice of change of interests of substantial holder**To Company Name/Scheme **Santos Limited**ACN/ARSN **007 550 923****1. Details of substantial holder(1)**Name **Challenger Limited (and its entities listed in Annexure 2)**ACN/ARSN (if applicable) **106 842 371**There was a change in the interests of the substantial holder on **07/10/2021**The previous notice was given to the company on **10/09/2021**The previous notice was dated **10/09/2021****2. Previous and present 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 when last required, and when now required, to give a substantial holding notice to the company or scheme, are as follows:

Class of securities (4)	Previous notice		Present notice	
	Person's votes	Voting power (5)	Person's votes	Voting power (5)
Ordinary Fully Paid	107,217,997	5.15%	129,118,808	6.20%

3. Changes in relevant interests

Particulars of each change in, or change in the nature of, a relevant interest of the substantial holder or an associate in voting securities of the company or scheme, since the substantial holder was last required to give a substantial holding notice to the company or scheme are as follows:

Date of change	Person whose relevant interest changed	Nature of change (6)	Consideration given in relation to change (7)	Class and number of securities affected	Person's votes affected
Refer Annexure 1	Challenger Limited (and its entities listed in Annexure 2)	Refer Annexure 1	Refer Annexure 1	Refer Annexure 1	Refer Annexure 1

4. Present relevant interests

Particulars of each relevant interest of the substantial holder in voting securities after the change are as follows:

Holder of relevant interest	Registered holder of securities	Person entitled to be registered as holder (8)	Nature of relevant interest (6)	Class and number of securities	Person's votes
Challenger Limited (and its entities listed in Annexure 2)	Citicorp Nominees Pty Limited	Citicorp Nominees Pty Limited	Ordinary Fully Paid securities purchased and sold on market and acquired and sold (via off market transfer) by Challenger Limited (and its entities listed in Annexure 2) and obtains a relevant interest by virtue of section 608(3) of the Corporations Act 2001 (Cth).	30,390,601 (Ordinary Fully Paid)	30,390,601
Challenger Limited (and its entities listed in Annexure 2)	UBS Nominees Pty Limited	UBS Nominees Pty Limited	As above	779,318 (Ordinary Fully Paid)	779,318
Challenger Limited (and its entities listed in Annexure 2)	State Street Boston	State Street Boston	As above	2,007,931 (Ordinary Fully Paid)	2,007,931
Challenger Limited (and its entities listed in Annexure 2)	J. P. Morgan Nominees Australia Pty Limited	J. P. Morgan Nominees Australia Pty Limited	As above	32,869,731 (Ordinary Fully Paid)	32,869,731

Challenger Limited (and its entities listed in Annexure 2)	National Nominees Limited	National Nominees Limited	As above	13,265,457 (Ordinary Fully Paid)	13,265,457
Challenger Limited (and its entities listed in Annexure 2)	BNP Paribas Nominees Pty Limited	BNP Paribas Nominees Pty Limited	As above	5,709,568 (Ordinary Fully Paid)	5,709,568
Challenger Limited (and its entities listed in Annexure 2)	Bank of New York Mellon	Bank of New York Mellon	As above	2,229,082 (Ordinary Fully Paid)	2,229,082
Challenger Limited (and its entities listed in Annexure 2)	HSBC Custody Nominees (Australia) Limited	HSBC Custody Nominees (Australia) Limited	As above	41,867,120 (Ordinary Fully Paid)	41,867,120

5. Changes in association

The persons who have become associates (2) of, ceased to be associates of, or have changed the nature of their association (9) with, the substantial holder in relation to voting interests in the company or scheme are as follows:

Name and ACN/ARSN (if applicable)	Nature of association
N/A	N/A

6. Addresses

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

Name	Address
Challenger Limited (and its entities listed in Annexure 2)	Level 2, 5 Martin Place, Sydney NSW 2000

Signature

print name **Linda Matthews** Capacity **Company Secretary**



sign here _____ date **11/10/2021**

DIRECTIONS

(1) 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 6 of the form.

(2) See the definition of "associate" in section 9 of the Corporations Act 2001.

(3) See the definition of "relevant interest" in sections 608 and 671B(7) of the Corporations Act 2001.

(4) The voting shares of a company constitute one class unless divided into separate classes.

(5) The person's votes divided by the total votes in the body corporate or scheme multiplied by 100.

(6) Include details of:

(a) any relevant agreement or other circumstances because of which the change in relevant interest occurred. 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 arrangement; and

(b) any qualification of the power of a person to exercise, control the exercise of, or influence the exercise of, the voting powers or 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.

(7) 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.

(8) 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".

(9) Give details, if appropriate, of the present association and any change in that association since the last substantial holding notice.

Linda Matthews
Company Secretary of Challenger Limited

Transactions:**Company****Name/Scheme:** Santos Limited (STO)**As at:** 07/10/2021**Class of security:** Ordinary Fully Paid

Date of Change	Holder of relevant interest	Nature of Change	Consideration	Number of Securities	Person's Votes Affected
09/09/2021	Challenger Limited (and its entities listed in Annexure 2)	Opening balance Adjustment	2,839	2,839	2,839
09/09/2021	As above	Buy	2,770,757	457,825	457,825
09/09/2021	As above	Sell	233,355	-38,594	38,594
09/09/2021	As above	Buy	284,747	47,050	47,050
09/09/2021	As above	Buy	1,414,655	233,750	233,750
09/09/2021	As above	Buy	5,917,797	977,825	977,825
09/09/2021	As above	Buy	1,247,015	206,050	206,050
09/09/2021	As above	Buy	5,258,734	868,925	868,925
13/09/2021	As above	Sell	99,187	-16,118	16,118
14/09/2021	As above	Sell	96,543	-14,963	14,963
16/09/2021	As above	Buy	662,592	103,731	103,731
16/09/2021	As above	Buy	394,338	61,735	61,735
16/09/2021	As above	Buy	596,033	93,311	93,311
16/09/2021	As above	Buy	688,264	107,750	107,750
16/09/2021	As above	Buy	470,766	73,700	73,700
16/09/2021	As above	Buy	1,040,502	162,894	162,894
16/09/2021	As above	Buy	3,671,056	574,716	574,716
16/09/2021	As above	Buy	460,808	72,141	72,141
16/09/2021	As above	Buy	71,969	11,267	11,267
17/09/2021	As above	Sell	194,715	-30,769	30,769
17/09/2021	As above	Sell	52,386	-8,278	8,278
17/09/2021	As above	Buy	655,467	142,597	142,597
17/09/2021	As above	Buy	82,541	13,069	13,069
17/09/2021	As above	Buy	229,093	36,273	36,273
17/09/2021	As above	Buy	401,372	102,704	102,704
17/09/2021	As above	Buy	917,635	145,292	145,292
17/09/2021	As above	Buy	292,775	46,356	46,356
17/09/2021	As above	Buy	356,615	56,464	56,464
17/09/2021	As above	Buy	550,125	87,103	87,103
17/09/2021	As above	Buy	198,714	31,463	31,463
17/09/2021	As above	Buy	1,645,279	260,502	260,502
17/09/2021	As above	Buy	2,271,061	359,584	359,584
17/09/2021	As above	Buy	1,190,427	188,484	188,484
17/09/2021	As above	Buy	743,262	117,683	117,683
17/09/2021	As above	Buy	596,818	94,496	94,496
17/09/2021	As above	Buy	893,345	141,446	141,446
20/09/2021	As above	Sell	470,083	-76,885	76,885
20/09/2021	As above	Sell	56,604	-9,258	9,258
22/09/2021	As above	Sell - Transfer	2,314,647	-366,822	366,822
28/09/2021	As above	Sell	161,759	-22,719	22,719
28/09/2021	As above	Sell	301,098	-42,732	42,732
29/09/2021	As above	Buy	261,992	51,313	51,313
29/09/2021	As above	Buy	61,265	8,685	8,685
29/09/2021	As above	Buy	93,918	13,314	13,314
29/09/2021	As above	Buy	162,328	37,109	37,109
29/09/2021	As above	Buy	698,680	99,046	99,046

Date of Change	Holder of relevant interest	Nature of Change	Consideration	Number of Securities	Person's Votes Affected
29/09/2021	As above	Buy	117,507	16,658	16,658
29/09/2021	As above	Buy	174,420	24,726	24,726
29/09/2021	As above	Buy	122,156	17,317	17,317
29/09/2021	As above	Buy	65,709	9,315	9,315
29/09/2021	As above	Buy	661,385	93,759	93,759
29/09/2021	As above	Buy	912,349	129,336	129,336
29/09/2021	As above	Buy	478,155	67,784	67,784
29/09/2021	As above	Buy	298,692	42,343	42,343
29/09/2021	As above	Buy	239,839	34,000	34,000
29/09/2021	As above	Sell - Transfer	1,088,778	-154,876	154,876
29/09/2021	As above	Buy	374,509	53,091	53,091
30/09/2021	As above	Buy	3,251,404	732,495	732,495
30/09/2021	As above	Sell - Transfer	16,116,418	-2,247,757	2,247,757
01/10/2021	As above	Buy	8,478,840	1,227,501	1,227,501
01/10/2021	As above	Buy	441,894	90,610	90,610
01/10/2021	As above	Buy	106,610	15,794	15,794
01/10/2021	As above	Buy	158,949	23,548	23,548
01/10/2021	As above	Buy	540,743	80,110	80,110
01/10/2021	As above	Buy	221,272	32,781	32,781
01/10/2021	As above	Buy	341,618	50,610	50,610
01/10/2021	As above	Buy	417,981	99,317	99,317
01/10/2021	As above	Buy	450,907	66,801	66,801
01/10/2021	As above	Buy	5,718,277	827,848	827,848
01/10/2021	As above	Buy	1,216,829	180,271	180,271
01/10/2021	As above	Buy	198,734	29,442	29,442
01/10/2021	As above	Buy	245,943	36,436	36,436
01/10/2021	As above	Buy	351,027	52,004	52,004
01/10/2021	As above	Buy	6,057,451	876,951	876,951
01/10/2021	As above	Buy	1,411,285	204,315	204,315
01/10/2021	As above	Buy	517,320	76,640	76,640
01/10/2021	As above	Buy	935,518	135,085	135,085
01/10/2021	As above	Buy	2,897,827	419,525	419,525
01/10/2021	As above	Buy	57,559	8,362	8,362
01/10/2021	As above	Buy	3,788,156	548,420	548,420
01/10/2021	As above	Buy	3,551,267	514,125	514,125
01/10/2021	As above	Buy	148,811	22,046	22,046
01/10/2021	As above	Buy	574,364	85,091	85,091
01/10/2021	As above	Buy	9,910,268	1,434,732	1,434,732
01/10/2021	As above	Buy	955,521	138,333	138,333
01/10/2021	As above	Buy	1,117,706	165,586	165,586
01/10/2021	As above	Buy	1,541,113	228,313	228,313
01/10/2021	As above	Buy	808,387	119,761	119,761
01/10/2021	As above	Buy	504,772	74,781	74,781
01/10/2021	As above	Buy	405,311	60,046	60,046
01/10/2021	As above	Buy	1,846,429	273,545	273,545
01/10/2021	As above	Buy	304,823	45,159	45,159
01/10/2021	As above	Buy	49,113	7,276	7,276
01/10/2021	As above	Buy	567,216	84,032	84,032
04/10/2021	As above	Buy	4,258,166	601,300	601,300
04/10/2021	As above	Buy	3,422,537	483,300	483,300
04/10/2021	As above	Buy	3,622,238	511,500	511,500
04/10/2021	As above	Buy	844,835	119,300	119,300
04/10/2021	As above	Buy	1,676,923	236,800	236,800
04/10/2021	As above	Buy	3,292,944	465,000	465,000
04/10/2021	As above	Buy	3,566,294	503,600	503,600
04/10/2021	As above	Buy	7,261,473	1,025,400	1,025,400
04/10/2021	As above	Buy	497,836	70,300	70,300
05/10/2021	As above	Buy	2,626,251	361,932	361,932
05/10/2021	As above	Buy	1,770,658	244,020	244,020
05/10/2021	As above	Buy	1,872,658	258,077	258,077
05/10/2021	As above	Buy	437,063	60,233	60,233
05/10/2021	As above	Buy	895,618	123,428	123,428

Date of Change	Holder of relevant interest	Nature of Change	Consideration	Number of Securities	Person's Votes Affected
05/10/2021	As above	Buy	1,172,587	161,598	161,598
05/10/2021	As above	Buy	1,099,401	151,512	151,512
05/10/2021	As above	Buy	3,064,910	422,385	422,385
05/10/2021	As above	Buy	295,487	40,722	40,722
06/10/2021	As above	Buy	2,741,962	367,314	367,314
06/10/2021	As above	Buy	1,848,668	247,648	247,648
06/10/2021	As above	Buy	1,955,169	261,915	261,915
06/10/2021	As above	Buy	456,314	61,128	61,128
06/10/2021	As above	Buy	935,083	125,264	125,264
06/10/2021	As above	Buy	1,224,244	164,000	164,000
06/10/2021	As above	Buy	1,147,833	153,764	153,764
06/10/2021	As above	Buy	3,199,956	428,667	428,667
06/10/2021	As above	Buy	308,509	41,328	41,328
07/10/2021	As above	Buy	3,031,964	416,719	416,719
07/10/2021	As above	Buy	2,044,194	280,958	280,958
07/10/2021	As above	Buy	2,161,953	297,143	297,143
07/10/2021	As above	Buy	504,577	69,350	69,350
07/10/2021	As above	Buy	1,033,978	142,112	142,112
07/10/2021	As above	Buy	1,353,735	186,060	186,060
07/10/2021	As above	Buy	1,269,241	174,447	174,447
07/10/2021	As above	Buy	3,538,396	486,324	486,324
07/10/2021	As above	Buy	341,140	46,887	46,887
07/10/2021	as above	Sell - Transfer	3,674,011	- 505,366	505,366
			Total Number of Securities	21,897,972	

Annexure 2

This is page 1 of 4 of Annexure 2 referred to in ASIC Form 604 - change of interest holder



Linda Matthews - Company Secretary of Challenger Limited

11/10/2021

Company Name	ACN / Company Number	Country of Incorporation
Challenger Limited	106842371	Australia
255 Finance Group Pty Ltd	628853056	Australia
255 Finance Investments Pty Ltd	164516401	Australia
255 Finance Pty Ltd	168112507	Australia
255 Finance Services Pty Ltd	168107355	Australia
Accurium Holdings Pty Ltd	158242936	Australia
Accurium Pty Ltd	009492219	Australia
Alphinity Investment Management Pty Ltd	140833709	Australia
Appia Europe Limited	6490323	United Kingdom
Appia Group Limited	99865	Jersey
Ardea Investment Management Pty Ltd	132902722	Australia
Ares Australia Management Pty Limited	636490732	Australia
Assetsecure Pty. Limited	110953618	Australia
Bentham Asset Management Pty Ltd	140833674	Australia
CDPG Australia Pty Limited	124498095	Australia
CDPG Luxembourg Holdings Sarl	B127717	Luxembourg
CDPG Luxembourg II S.a.r.l	B127580	Luxembourg
CDPG Luxembourg Sarl	B127515	Luxembourg
CDPG Malta Limited	C41110	Malta
Cescade Pty Limited	096097399	Australia
Challenger Direct Pty Ltd	006475501	Australia
Challenger Diversified Property Development Pty Limited	121624833	Australia
Challenger Emerging Market Infrastructure Fund Pte. Ltd	200804361D	Singapore
Challenger Emerging Market Infrastructure Fund, L.P.		Cayman Islands
Challenger Financial Services Pty Limited	087464131	Australia
Challenger FM 2 Holdings Pty Limited	080036657	Australia
Challenger Funds Management (Asia) Pte Ltd	202113533D	Singapore
Challenger Funds Management Holdings Pty Limited	107728030	Australia
Challenger Group Holdings Limited	002993302	Australia
Challenger Group Pty Limited	003374196	Australia
Challenger Group Services Pty. Ltd.	085657307	Australia
Challenger Holdco1 Holdings Pty Ltd	645868659	Australia
Challenger Holdco2 Holdings Pty Ltd	646761275	Australia
Challenger Home Loan Corporation Pty Ltd	058891302	Australia
Challenger Inventory Finance Servicing Pty Limited	107706810	Australia
Challenger Investment Partners Limited	092382842	Australia
Challenger Investment Solutions Management Pty Ltd	130035353	Australia
Challenger Japan Holdings Kabushiki Kaisha	0100-01-182399	Japan
Challenger Japan Holdings Pty Limited	617208205	Australia
Challenger Japan Kabushiki Kaisha	0100-01-182920	Unknown

Annexure 2

This is page 2 of 4 of Annexure 2 referred to in ASIC Form 604 - change of interest holder



Linda Matthews - Company Secretary of Challenger Limited
11/10/2021

Company Name	ACN / Company Number	Country of Incorporation
Challenger Kabushiki Kaisha	0100-01-182872	Unknown
Challenger LBC Terminals Holding Company Limited	C41149	Malta
Challenger Life CDI Nominees Pty Ltd	055293644	Australia
Challenger Life Company Holdings Pty Ltd	006381193	Australia
Challenger Life Company Limited	072486938	Australia
Challenger Life Debt Investments (Europe) Limited	7626067	United Kingdom
Challenger Life Fund Property Investments Pty Ltd	161212693	Australia
Challenger Life Investments UK Limited	6067787	United Kingdom
Challenger Life Nominees No.2 Pty Ltd	078627013	Australia
Challenger Life Nominees No.3 Pty Limited	151482147	Australia
Challenger Life Nominees Pty Ltd	091336793	Australia
Challenger Life Subsidiary Holdings Pty Limited	099742122	Australia
Challenger Managed Investments (International) Pty Limited	120871212	Australia
Challenger Management Services (UK) Limited	6393787	United Kingdom
Challenger Margin Lending Pty Ltd	091338822	Australia
Challenger MBK Emerging Market Infrastructure Fund GP Ltd	WK-209744	Cayman Islands
Challenger Mortgage Management Pty Ltd	087271109	Australia
Challenger Non-conforming Finance Pty Ltd	107725486	Australia
Challenger Originator Finance Pty Ltd	095085466	Australia
Challenger Property Asset Management Pty Ltd	077569021	Australia
Challenger Retirement and Investment Services Limited	115534453	Australia
Challenger Securitisation Management Pty Ltd	100346898	Australia
Challenger Skybridge (Group) Holding Company Pty Ltd	130888327	Australia
Challenger Skybridge (Hastings) Holding Company Pty Ltd	130888274	Australia
Challenger Special Servicing Pty Ltd	107707415	Australia
Challenger Treasury Limited	093307996	Australia
Challenger Wholesale Finance Holdings Pty Limited	087284240	Australia
Challenger Wind Holdings Pty Limited	151496061	Australia
CLS US Holdings, LLC	5302598	United States
CPHIC Investments Pty Ltd	093340526	Australia
CSPP1 Maitland Pty Ltd	122460968	Australia
CSPP1 Mavis Court Pty Ltd	122461983	Australia
Eiger Capital Pty Limited	631838607	Australia
Fidante Partners (Guernsey) Limited	40288	Guernsey
Fidante Partners AAM Holdings Pty Limited	636490189	Australia
Fidante Partners Alphinity Holdings Pty Ltd	140716016	Australia
Fidante Partners Ardea Holdings Pty Ltd	133865853	Australia
Fidante Partners Arete Holdings Pty Ltd	143836373	Australia
Fidante Partners Avenir Capital Holdings Pty Ltd	616504502	Australia
Fidante Partners Bentham Holdings Pty Ltd	140715573	Australia
Fidante Partners Eiger Holdings Pty Limited	631837360	Australia
Fidante Partners Europe Limited	4040660	United Kingdom
Fidante Partners FME Holdings Limited	11410594	United Kingdom

Annexure 2

This is page 3 of 4 of Annexure 2 referred to in ASIC Form 604 - change of interest holder



Linda Matthews - Company Secretary of Challenger Limited
11/10/2021

Company Name	ACN / Company Number	Country of Incorporation
Fidante Partners Holdings (Guernsey) Limited	43315	Guernsey
Fidante Partners Holdings Europe Limited	6172534	United Kingdom
Fidante Partners Holdings Pty Limited	123318650	Australia
Fidante Partners Kapstream Holdings Pty Limited	123319460	Australia
Fidante Partners Latigo Holdings LLC	5651705	Unknown
Fidante Partners Lennox Holdings Pty Limited	616975565	Australia
Fidante Partners Limited	002835592	Australia
Fidante Partners Merlon Holdings Pty Ltd	140715662	Australia
Fidante Partners Metisq Holdings Pty Ltd	143376961	Australia
Fidante Partners Novaport Holdings Pty Ltd	140715797	Australia
Fidante Partners Ox Holdings Pty Ltd	649174087	Australia
Fidante Partners R&M Holdings Pty Limited	152375436	Australia
Fidante Partners Services Limited	119605373	Australia
Fidante Partners Tempo Holdings Pty Ltd	167321262	Australia
Fidante Partners USA LLC	81-4925448	United States
Fidante Partners Wavestone Holdings Pty Limited	133626276	Australia
Fidante Partners Whitehelm Holdings Pty Ltd	169043903	Australia
Fidante Partners Wyetree Limited	9387239	United Kingdom
Gasvalpo S.A.	96.960.800-6	Chile
Greencape Capital Pty Ltd	120328529	Australia
GV Cayman Company Limited	OG-206918	Cayman Islands
GV Chile Holding Limitada	124311723611675	Chile
GV Chile Limitada	124301725311696	Chile
GV Jersey Holding Company Limited	100293	Jersey
GV Jersey Trustee Company Limited	100294	Jersey
GV Jersey Trustee Company No. 2 Limited	100367	Jersey
Howard Commercial Lending Pty Ltd	000033143	Australia
Kudu Investment Partners I, Lp	47-2497501	Unknown
Lanv Pty Ltd	147224502	Australia
Lease Collateral No.2 Pty Ltd	168112481	Australia
Lease Collateral Pty Ltd	168112472	Australia
Lease Funding Management Pty Ltd	168112490	Australia
Lennox Capital Partners Pty Limited	617001966	Australia
Maitland Nominee Holdings Pty Limited	122853114	Australia
Mawbury Pty Limited	096097479	Australia
Merlon Capital Partners Pty Ltd	140833683	Australia
Metisq Capital Holdings Pty Ltd	158011351	Australia
Metisq Capital Pty Ltd	104642613	Australia
MIR Libra Capital Management Ltd	236748	Cayman Islands
MyLifeMyFinance Limited	087651750	Australia

Annexure 2

This is page 4 of 4 of Annexure 2 referred to in ASIC Form 604 - change of interest holder



Linda Matthews - Company Secretary of Challenger Limited

11/10/2021

Company Name	ACN / Company Number	Country of Incorporation
Novaport Capital Pty Ltd	140833656	Australia
Oaklands Hill Pty Ltd	149814559	Australia
Oaklands Hill Wind Farm Pty Ltd	126595935	Australia
Offshore Reinsurer (Bermuda) Company Limited	51746	Bermuda
Ox Capital Management Pty Ltd	648887914	Australia
Residential Real Estate Total Return Opportunities Fund Ltd.	212456	Cayman Islands
Residential Real Estate Total Return Opportunities Master Fund L.	27263	Cayman Islands
Sabrand Limited	126677	Cyprus
The Liberty Group Consortium Pty Ltd	082564289	Australia
TLG Services Pty Limited	092500608	Australia
TLGH Pty Limited	092927467	Australia
TRE Data Centres Canberra Pty Ltd	141881227	Australia
US LLC Holdings Pty Ltd	130888292	Australia
US LLC Investments LLC	36-4811214	Unknown
Waterford County Pty Limited	122853089	Australia
Wavestone Capital Pty Limited	120179419	Australia
Welcome Break Group Limited	3147949	United Kingdom
Welcome Break Holdings (1) Limited	4099287	United Kingdom
Welcome Break Holdings (2) Limited	4379574	United Kingdom
Welcome Break Holdings Limited	3290817	Cayman Islands
Welcome Break Limited	1735476	United Kingdom
Welcome Break No.1 Limited	8331837	United Kingdom
Welcome Break No.2 Limited	8331870	United Kingdom
Welcome Break Services Limited	4099292	United Kingdom
Whitehelm Capital Pty Ltd	008636717	Australia