THORNEY OPPORTUNITIES LTD

ACN 080 167 264

CROSS RELEASE ASX: HUB

15 January 2021

BY ASX ONLINE - 5 pages

Manager Company Announcements ASX Limited Level 10 20 Bond Street SYDNEY 2000

Dear Sir/Madam,

Notice of initial substantial holder HUB24 Limited [ASX:HUB]

Following is a Form 603 *Notice of initial substantial holder* dated 15 January 2021 in accordance with section 671B of the Corporations Act.

Please note that this notice was not lodged within 2 business days of 5 November 2020 as required due to administrative oversight. The Investment Manager has conducted a review of its internal procedures and systems and identified areas of improvement which is expected to prevent the issue from occurring again.

Yours sincerely,

CRAIG SMITH ACIS, CPA

Secretary

Form **603**

Corporations Act 2001 Section 671B

Notice of initial substantial holder

To:	company name/s	HUB24 LTD
	ABN	87 124 891 685

1. Details of substantial holder

Nama	THORNEY OPPORTUNITIES LTD and each of the entities listed
Name	in the attached Annexure 'A' to this notice.
ACN (if applicable)	080 167 264

The holder became a substantial holder on

5-Nov-20

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 had a relevant interest in on the date the substantial holder became of substantial holder are as follows:

Class of Securities	Number of securities	Person's votes	Voting power
Fully paid ordinary shares	5,806,797	5,779,078	8.63%

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	Number and class of securities
Thorney Opportunities Ltd	Beneficial owner of voting shares	52,281 ordinary shares
Associates:		
	Beneficial owner of voting shares	5,150,297 ordinary shares
Thorney Investment Group	Deemed relevant interest in shares held by Thorney Opportunities Ltd by virtue of section 608(3)(b) of the Corporations Act 2001 52,281 ordinary share	
Jasforce Pty Ltd Beneficial owner of voting shares		576,500 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	Number and class of securities
Thorney Opportunities Ltd	UBS Nominees Pty Ltd	Thorney Opportunities Ltd	52,281 ordinary shares
	UBS Nominees Pty Ltd	TIGA Trading Pty Ltd	351,797 ordinary shares
Thorney Investment Group	HSBC Custody Nominees (Australia) Ltd	Thorney Holdings Proprietary Limited	4,798,500 ordinary shares
	UBS Nominees Pty Ltd	Thorney Opportunities Ltd	80,000 ordinary shares
Jasforce Pty Ltd	Jasforce Pty Ltd	Jasforce Pty Ltd	576,500 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	Cash consideration	Number and class of securities
TIGA Trading Pty Ltd	5-Nov-20	\$Nil	162,537 ordinary shares
Thorney Opportunities Ltd	5-1104-20	\$20.00 per share	125,000 ordinary shares
TIGA Trading Pty Ltd		\$Nil	1,500 ordinary shares
Thorney Holdings Pty Ltd	30-Nov-20	\$Nil	1,500 ordinary shares
Jasforce Pty Ltd		\$Nil	1,500 ordinary shares
Thorney Opportunities Ltd	08-Jan-21	\$22.50 per share	431 ordinary shares
Thorney Opportunities Ltd	11-Jan-21	\$22.50 per share	24,004 ordinary shares
Thorney Opportunities Ltd	14-Jan-21	\$22.54 per share	20,565 ordinary shares
Thorney Opportunities Ltd	15-Jan-21	\$23.13 per share	27,719 ordinary shares

6. Associates

The reasons the persons named in paragraph 3 above are associates of the substantial holder are as follows:

Name	Nature of association
Refer associated entities details in Annexure A	Under the <i>Corporations Act 2001</i> the entities listed in Annexure A are deemed associates of Thorney Opportunities Ltd in relation to the investment in HUB24 Limited

7. Addresses

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

Name	Address
Thorney Opportunities Ltd	Level 39, 55 Collins Street, Melbourne 3000
Associated entities	Refer Annexure 'A'

Signature

Print name
Sign here

CRAIG SMITH ACIS, CPA

Capacity SECRETARY

Date 15 January 2021

ANNEXURE 'A'

This is Annexure A referred to in the Form 603 Notice of initial substantial holder signed by me and dated 15 January 2021.

CRAIG SMITH

Secretary

ASSOCIATED ENTITIES DETAILS

Entity	Address			
Thorney Investment Group				
Jamahjo Pty Ltd, ACN 117 488 696	c/- Wilson Pateras, Ground Floor, 40 River Boulevard, Richmond 3121			
Thistle Custodians Pty Ltd, ACN 078 027 193	Level 39, 55 Collins Street, Melbourne 3000			
Thistle Holdings Pty Ltd, ACN 075 051 464	Level 39, 55 Collins Street, Melbourne 3000			
Thorney Alpha Pty Ltd, ACN 162 820 537	Level 39, 55 Collins Street, Melbourne 3000			
Thorney Beta Pty Ltd, ACN 162 828 677	Level 39, 55 Collins Street, Melbourne 3000			
Thorney Holdings Pty Ltd, ACN 006 262 835	Level 39, 55 Collins Street, Melbourne 3000			
Thorney International Pty Ltd, ACN 132 886 698	Level 39, 55 Collins Street, Melbourne 3000			
Thorney Investment Group Australia Pty Ltd, ACN 117 488 892	Level 39, 55 Collins Street, Melbourne 3000			
Thorney Management Services Pty Ltd, ACN 164 880 148	Level 39, 55 Collins Street, Melbourne 3000			
Thorney Omega Pty Ltd, ACN 163 964 636	Level 39, 55 Collins Street, Melbourne 3000			
Tiga Property Pty Ltd, ACN 117 811 453	Level 39, 55 Collins Street, Melbourne 3000			
Tiga (Ballarat) Pty Ltd, ACN 117 812 030	Level 39, 55 Collins Street, Melbourne 3000			
Tiga Finance Pty Ltd, ACN 118 521 412	Level 39, 55 Collins Street, Melbourne 3000			
Tiga (Hawthorn) Pty Ltd, ACN 126 952 663	Level 39, 55 Collins Street, Melbourne 3000			
Tiga Tails Pty Ltd, ACN 080 534 416	Level 39, 55 Collins Street, Melbourne 3000			
Tiga Trading Pty Ltd, ACN 118 961 210	Level 39, 55 Collins Street, Melbourne 3000			
Other Associates	<u> </u>			
Jasforce Pty Ltd, ACN 007 167 713	c/- Wilson Pateras, Ground Floor, 40 River Boulevard, Richmond 3121			