Form 603

Corporations Act 2001
Section 671B

Notice of initial substantial holder

To Company Name/Scheme **Atomos Limited (ASX:AMS)**

ACN/ARSN **ACN: 139 730 500**

1. Details of substantial holder (1)

Name **Wilson Asset Management Group (refer entities listed in Annexure A)**

ACN/ARSN (if applicable)

The holder became a substantial holder on **31/03/2021**

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)
Ordinary Shares	**11,731,280**	**11,731,280**	**5.37%**

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
Annexure C		

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
Annexure C			

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
		Cash	Non-cash	
Annexure B				

For personal use only

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
n/a	

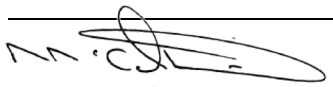
7. Addresses

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

Name	Address
Refer Annexure A	

Signature

print name **Martyn McCathie** capacity **Head of Operations**

sign here  date **06/04/2021**

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 7 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 total number of votes attached to all the voting shares in the company or voting interests in the scheme (if any) that the person or an associate has a relevant interest in.

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

(7) Include details of:

(a) any relevant agreement or other circumstances by which the relevant interest was acquired. 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.

(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) 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.

For personal use only

Annexure A

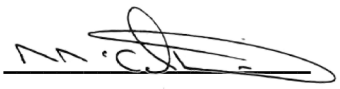
Wilson Asset Management Group

1. Details of Wilson Asset Management Group

Name	ACN / ARSN
Wilson Asset Management (International) Pty Limited	(ACN 081 047 118)
MAM Pty Limited	(ACN 100 276 542)
WAM Capital Limited	(ACN 086 587 395)
WAM Research Limited	(ACN 100 504 541)
WAM Active Limited	(ACN 126 420 719)
Botanical Nominees Pty Limited as trustee of the Wilson Asset Management Equity Fund	(ACN 081 032 000)
WAM Leaders Limited	(ACN 611 053 751)
WAM Microcap Limited	(ACN 617 838 418)
WAM Global Limited	(ACN 624 572 925)
WAM Alternative Assets Limited	(ACN 168 941 704)

6. Addresses

Name	Address	
Wilson Asset Management (International) Pty Limited	Level 26,1 Farrer Place, Sydney, NSW 2000	
MAM Pty Limited	Level 26,1 Farrer Place, Sydney, NSW 2000	
WAM Capital Limited	Level 26,1 Farrer Place, Sydney, NSW 2000	
WAM Research Limited	Level 26,1 Farrer Place, Sydney, NSW 2000	
WAM Active Limited	Level 26,1 Farrer Place, Sydney, NSW 2000	
Botanical Nominees Pty Limited	Level 26,1 Farrer Place, Sydney, NSW 2000	
WAM Leaders Limited	Level 26,1 Farrer Place, Sydney, NSW 2000	
WAM Microcap Limited	Level 26,1 Farrer Place, Sydney, NSW 2000	
WAM Alternative Assets Limited	Level 26,1 Farrer Place, Sydney, NSW 2000	
WAM Global Limited	Level 26,1 Farrer Place, Sydney, NSW 2000	
HSBC Custody Nominees (Australia) Limited	Level 32, 580 George Street, Sydney NSW 2000	

Signed: 

Date: 06/04/2021

For personal use only

ANNEXURE B

Date of Change	Persons whose relevant interest changed	Nature of Change	Consideration given in relation to change (9)	Number of Securities affected	Class of Securities affected	Persons votes affected
30-Nov-20	WAM Microcap Limited	On Market Purchase	(98,161.70)	100,000	Ordinary Shares	100,000
14-Dec-20	WAM Microcap Limited	On Market Purchase	(88,059.12)	93,785	Ordinary Shares	93,785
15-Dec-20	WAM Microcap Limited	On Market Purchase	(193,082.84)	206,320	Ordinary Shares	206,320
18-Dec-20	WAM Microcap Limited	On Market Purchase	(223,505.45)	258,611	Ordinary Shares	258,611
07-Jan-21	WAM Microcap Limited	On Market Purchase	(54,213.85)	50,000	Ordinary Shares	50,000
12-Jan-21	WAM Microcap Limited	On Market Purchase	(124,492.37)	126,180	Ordinary Shares	126,180
27-Jan-21	WAM Microcap Limited	On Market Purchase	(144,313.35)	157,202	Ordinary Shares	157,202
28-Jan-21	WAM Microcap Limited	On Market Purchase	(218,027.56)	242,798	Ordinary Shares	242,798
29-Jan-21	WAM Microcap Limited	On Market Purchase	(221,141.05)	250,002	Ordinary Shares	250,002
01-Feb-21	WAM Microcap Limited	On Market Purchase	(71,509.12)	86,024	Ordinary Shares	86,024
03-Feb-21	WAM Microcap Limited	On Market Purchase	(139,637.10)	150,000	Ordinary Shares	150,000
04-Feb-21	WAM Microcap Limited	On Market Purchase	(313,660.65)	337,254	Ordinary Shares	337,254
05-Feb-21	WAM Microcap Limited	On Market Purchase	(480,792.00)	500,000	Ordinary Shares	500,000
22-Feb-21	WAM Capital Limited	On Market Purchase	(3,802,443.60)	3,717,286	Ordinary Shares	3,717,286
22-Feb-21	WAM Active Limited	On Market Purchase	(236,388.03)	231,094	Ordinary Shares	231,094
22-Feb-21	Botanical Nominees Pty Limited as trustee of the Wilson Asset Management Equity Fund	On Market Purchase	(155,093.39)	151,620	Ordinary Shares	151,620
26-Feb-21	WAM Capital Limited	On Market Purchase	(149,617.05)	149,580	Ordinary Shares	149,580
26-Feb-21	WAM Active Limited	On Market Purchase	(9,301.30)	9,299	Ordinary Shares	9,299
26-Feb-21	Botanical Nominees Pty Limited as trustee of the Wilson Asset Management Equity Fund	On Market Purchase	(6,102.51)	6,101	Ordinary Shares	6,101
04-Mar-21	WAM Microcap Limited	On Market Purchase	(169,151.66)	170,665	Ordinary Shares	170,665
05-Mar-21	WAM Microcap Limited	On Market Purchase	(73,377.27)	76,000	Ordinary Shares	76,000
08-Mar-21	WAM Microcap Limited	On Market Purchase	(147,603.14)	150,000	Ordinary Shares	150,000
09-Mar-21	WAM Microcap Limited	On Market Purchase	(19,271.67)	19,598	Ordinary Shares	19,598
11-Mar-21	WAM Microcap Limited	On Market Purchase	(95,467.27)	100,000	Ordinary Shares	100,000
12-Mar-21	WAM Microcap Limited	On Market Purchase	(97,530.67)	100,000	Ordinary Shares	100,000
25-Mar-21	WAM Active Limited	On Market Purchase	(101,493.69)	115,000	Ordinary Shares	115,000
26-Mar-21	WAM Microcap Limited	On Market Purchase	(15,348.00)	17,086	Ordinary Shares	17,086
26-Mar-21	WAM Capital Limited	On Market Purchase	(22,367.17)	24,900	Ordinary Shares	24,900
26-Mar-21	WAM Active Limited	On Market Purchase	(1,812.72)	2,018	Ordinary Shares	2,018
26-Mar-21	Botanical Nominees Pty Limited as trustee of the Wilson Asset Management Equity Fund	On Market Purchase	(932.42)	1,038	Ordinary Shares	1,038
29-Mar-21	WAM Microcap Limited	On Market Purchase	(24,077.66)	26,427	Ordinary Shares	26,427
29-Mar-21	WAM Capital Limited	On Market Purchase	(76,896.92)	84,400	Ordinary Shares	84,400
29-Mar-21	WAM Active Limited	On Market Purchase	(6,693.85)	7,347	Ordinary Shares	7,347
29-Mar-21	Botanical Nominees Pty Limited as trustee of the Wilson Asset Management Equity Fund	On Market Purchase	(2,934.65)	3,221	Ordinary Shares	3,221
31-Mar-21	WAM Microcap Limited	On Market Purchase	(180,861.17)	203,842	Ordinary Shares	203,842
31-Mar-21	WAM Capital Limited	On Market Purchase	(431,753.01)	486,613	Ordinary Shares	486,613
31-Mar-21	WAM Active Limited	On Market Purchase	(36,517.03)	41,157	Ordinary Shares	41,157
31-Mar-21	Botanical Nominees Pty Limited as trustee of the Wilson Asset Management Equity Fund	On Market Purchase	(16,314.96)	18,388	Ordinary Shares	18,388
01-Apr-21	WAM Microcap Limited	On Market Purchase	(15,589.38)	17,293	Ordinary Shares	17,293
01-Apr-21	WAM Capital Limited	On Market Purchase	(60,012.76)	66,571	Ordinary Shares	66,571
01-Apr-21	WAM Active Limited	On Market Purchase	(5,019.47)	5,568	Ordinary Shares	5,568
01-Apr-21	Botanical Nominees Pty Limited as trustee of the Wilson Asset Management Equity Fund	On Market Purchase	(2,170.78)	2,408	Ordinary Shares	2,408

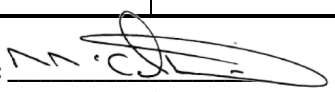
Signed: 

Date: 06/04/2021

For personal use only

ANNEXURE C

Holder of Relevant Interest	Registered Holder of Securities	Nature of relevent interest (7)	Person entitled to be registered as holder (8)	Class and Number of Securities
Botanical Nominees Pty Limited as trustee of the Wilson Asset Management Equity Fund	HSBC Custody Nominees (Australia) Limited	Management of portfolio of Botanical Nominees Pty Limited as trustee of the Wilson Asset Management Equity Fund	Botanical Nominees Pty Limited as trustee of the Wilson Asset Management Equity Fund	182,776 ordinary shares
WAM Active Limited	HSBC Custody Nominees (Australia) Limited	Management of portfolio of WAM Active Limited	WAM Active Limited	411,483 ordinary shares
WAM Capital Limited	HSBC Custody Nominees (Australia) Limited	Management of portfolio of WAM Capital Limited	WAM Capital Limited	4,529,350 ordinary shares
WAM Microcap Limited	HSBC Custody Nominees (Australia) Limited	Management of portfolio of WAM Microcap Limited	WAM Microcap Limited	6,607,671 ordinary shares

Signed: 

Date: 06/04/2021

For personal use only