

**Form 603**  
Corporations Act 2001  
Section 671B

**Notice of initial substantial holder**

To Company Name/Scheme	Comms Group Limited (CCG)
ACN/ARSN	619 196 539
1. Details of substantial holder (1) Name	Robbie Bennetts Enterprises Pty Ltd ABN 23 154 545 007 (RBE) and RJ&SG Bennetts Superannuation Pty Ltd (RJ&SG Bennetts S/F A/C) ABN 60 294 028 976 (RSB Super) & Bellglow Pty Ltd (Bennetts Family A/C) ABN 82 826 830 741 (BELL)
ACN/ARSN (if applicable)	As shown above
The holder became a substantial holder on	6 July 2022

**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)
Fully Paid Ordinary Shares in the capital of CCG (Shares)	22,098,993	22,098,993	5.9%

**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
RBE	RBE relevant interest is held pursuant to section 608(1)(a) of the Corporations Act 2001 (Cth) (Corporations Act) as the registered holder of Shares.	21,805,257 Shares
Bell	BELL relevant interest is held pursuant to section 608(1)(a) of the Corporations Act 2001 (Cth) (Corporations Act) as the registered holder of Shares.	200,000 Shares
RSB Super	RSB Super relevant interest is held pursuant to section 608(1)(a) of the Corporations Act as the registered holder of Shares.	93,736 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 (8)	Class and number of securities
RBE	RBE	Robert John Bennetts	21,805,257 Shares
BELL	BELL	Robert John Bennetts	200,000 Shares
RSB Super	RSB Super	Robert John Bennetts	93,736 Shares

**5. Consideration**

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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	
RBE	01/07/2022		Partial consideration for the shares held by RBE in OnGroup Holdings Pty Ltd ABN 68622185808 acquired by CCG.	8,994,409 Shares

**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
Robert John Bennetts	Associated with RBE, RSB Super And Bell pursuant to section 11(a) of the Corporations Act as a director of RBE, RSB Super & Bell

**7. Addresses**

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

Name	Address
RBE & RSB Super & Bell	Unit 7 43-49 Sandgate Road Albion Qld 4010

**Signature**

Robert John Bennetts

In his capacity as a director of RBE & RSB Super & Bell

sign here



date 13 August 2022

**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.

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(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, moneys 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.

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