

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

Notice of initial substantial holder

To: TABCORP HOLDINGS LIMITED
ACN: 063 780 709
ASX Code: TAH

1. Details of substantial holder

Name: Insignia Financial Ltd
ACN: 100 103 722

This notice is given by Insignia Financial Ltd on behalf of itself and its subsidiaries.

The holder became a substantial shareholder on: 23-Sep-2024

2. Previous and present voting power

The total number of votes attached to all the voting shares in the company or voting interest in the scheme that the substantial holder or an associate had a relevant interest in on the date the substantial holder is as follows:

Class of securities	Number of securities	Person's votes	Voting Power
Ordinary	116,959,557	116,959,557	5.119%

3. Details of present registered holders

The persons registered as holders of the securities are as follows:

Holder	Registered holder of securities	Person Entitled to be holder	Nature of relevant interest	Class & Number (Ord)	Person's votes
OnePath Funds Management Limited (ACN 003 002 800)	J.P. Morgan Nominees Australia Pty Limited		Pursuant to section 608 of the Corporations Act	8,569,453	8,569,453
Oasis Funds Management Limited (ACN 106 045 050)	Bond Street Custodians Limited		Pursuant to section 608 of the Corporations Act	50,832	50,832
OnePath Custodians Pty Limited (ACN 008 508 496)	Bond Street Custodians Limited		Pursuant to section 608 of the Corporations Act	31,079	31,079
Antares Capital Partners Ltd (ACN 066 081 114)	National Nominees (NAS)		Pursuant to section 608 of	6,379,285	6,379,285

			the Corporations Act		
MLC Investments Ltd (ACN 004 278 899)	National Nominees (NAS)		Pursuant to section 608 of the Corporations Act	60,487,865	60,487,865
Antares Capital Partners Ltd (ACN 066 081 114)	UBS Nominees Pty Ltd		Pursuant to section 608 of the Corporations Act	10,689,773	10,689,773
IOOF Investment Services Ltd (ACN 007 350 405)	JPMorgan Nominees Australia Pty Limited		Pursuant to section 608 of the Corporations Act	26,478,864	26,478,864
IOOF Investment Management Ltd (ACN 006 695 021)	IOOF Investment Services Ltd		Pursuant to section 608 of the Corporations Act	4,272,406	4,272,406

4. Consideration

The consideration paid for each relevant interest and acquired in the four months prior to the day that the substantial holder became a substantial holder is as follows:

Date	Person	Nature	Consideration	Class & number (ord)	Person's votes
5/06/2024	OnePath Funds Management Limited (ACN 003 002 800)	Sold on market	-36292.46	-59,123	-59,123
5/06/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Purchased on market	5040	8,064	8,064
6/06/2024	OnePath Funds Management Limited (ACN 003 002 800)	Sold on market	-57615.76	-95,238	-95,238
6/06/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Purchased on market	128181.08	210,092	210,092
7/06/2024	OnePath Funds Management Limited (ACN 003 002 800)	Sold on market	-43126.61	-71,429	-71,429
7/06/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-37408.01	-62,017	-62,017
10/06/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-827.14	-1,400	-1,400
11/06/2024	OnePath Funds Management Limited (ACN 003 002 800)	Sold on market	-40657.12	-68,184	-68,184
11/06/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-2001.39	-3,424	-3,424
12/06/2024	OnePath Funds Management Limited (ACN 003 002 800)	Sold on market	-40568.67	-68,184	-68,184
12/06/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-2978.73	-5,044	-5,044

	695 021)				
13/06/2024	OnePath Funds Management Limited (ACN 003 002 800)	Sold on market	-53892	-90,912	-90,912
13/06/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Purchased on market	24127.67	40,455	40,455
13/06/2024	MLC Investments Ltd (ACN 004 278 899)	Purchased on market	84951.64	142,945	142,945
14/06/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-19075.59	-29,451	-29,451
14/06/2024	MLC Investments Ltd (ACN 004 278 899)	Purchased on market	129969.18	209,931	209,931
17/06/2024	OnePath Custodians Pty Limited (ACN 008 508 496)	Sold on market	-60.82	-133	-133
17/06/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Purchased on market	4029.9	6,060	6,060
17/06/2024	IOOF Investment Services Ltd (ACN 007 350 405)	Purchased on market	735506.9	1,117,452	1,117,452
17/06/2024	MLC Investments Ltd (ACN 004 278 899)	Purchased on market	1413254.4	2,121,888	2,121,888
17/06/2024	Antares Capital Partners Ltd (ACN 066 081 114)	Purchased on market	420165.99	637,400	637,400
18/06/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-4357.6	-6,753	-6,753
19/06/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-131840.28	-200,000	-200,000
19/06/2024	IOOF Investment Services Ltd (ACN 007 350 405)	Sold on market	-333022.95	-223,650	-223,650
20/06/2024	IOOF Investment Services Ltd (ACN 007 350 405)	Sold on market	-193993.13	-130,281	-130,281
21/06/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-51248.08	-74,950	-74,950
21/06/2024	IOOF Investment Services Ltd (ACN 007 350 405)	Sold on market	-67161.47	-45,104	-45,104
24/06/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Purchased on market	4007.25	5,850	5,850
24/06/2024	IOOF Investment Services Ltd (ACN 007 350 405)	Sold on market	-437056.57	-405,912	-405,912
25/06/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Purchased on market	17170.09	24,870	24,870
25/06/2024	IOOF Investment Services Ltd (ACN 007 350 405)	Sold on market	-185061.89	-124,283	-124,283
26/06/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Purchased on market	7426.39	10,609	10,609
26/06/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-157.5	-231	-231
26/06/2024	IOOF Investment Services Ltd (ACN 007 350 405)	Sold on market	-222290.76	-149,285	-149,285
27/06/2024	IOOF Investment	Sold on market	-6721.26	-10,115	-10,115

	Management Ltd (ACN 006 695 021)				
28/06/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Purchased on market	801.02	1,324	1,324
1/07/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-22573.3	-32,551	-32,551
1/07/2024	IOOF Investment Services Ltd (ACN 007 350 405)	Sold on market	-117746.55	-134,584	-134,584
1/07/2024	MLC Investments Ltd (ACN 004 278 899)	Sold on market	-3121.61	-4,493	-4,493
2/07/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Purchased on market	2612.24	3,589	3,589
2/07/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Purchased on market	1621	2,301	2,301
2/07/2024	Antares Capital Partners Ltd (ACN 066 081 114)	Sold on market	-54481.3	-79,411	-79,411
3/07/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-7399.33	-10,679	-10,679
3/07/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Purchased on market	104.78	151	151
4/07/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Purchased on market	391.89	567	567
5/07/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Purchased on market	3827.24	5,317	5,317
5/07/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Purchased on market	239.5	343	343
8/07/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Purchased on market	276.6	398	398
8/07/2024	MLC Investments Ltd (ACN 004 278 899)	Sold on market	-64984.35	-94,113	-94,113
9/07/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-4103.25	-6,032	-6,032
9/07/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Purchased on market	4309.96	6,234	6,234
10/07/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-3485.11	-5,056	-5,056
11/07/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-8749.55	-12,528	-12,528
12/07/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-4003.89	-5,808	-5,808
15/07/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-3676.04	-5,342	-5,342
15/07/2024	IOOF Investment	Sold on market	-1447.68	-2,088	-2,088

	Management Ltd (ACN 006 695 021)				
16/07/2024	OnePath Funds Management Limited (ACN 003 002 800)	Purchased on market	59043.37	86,368	86,368
16/07/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-9353.8	-13,792	-13,792
16/07/2024	MLC Investments Ltd (ACN 004 278 899)	Purchased on market	19960.5	29,198	29,198
17/07/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-2169.33	-3,216	-3,216
17/07/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-470.29	-687	-687
19/07/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-12157.28	-18,117	-18,117
22/07/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Purchased on market	2946.08	4,351	4,351
22/07/2024	IOOF Investment Services Ltd (ACN 007 350 405)	Purchased on market	47106.09	70,015	70,015
22/07/2024	MLC Investments Ltd (ACN 004 278 899)	Sold on market	-383705.28	-560,813	-560,813
23/07/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-23534.1	-34,418	-34,418
24/07/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-11716.86	-17,184	-17,184
24/07/2024	IOOF Investment Services Ltd (ACN 007 350 405)	Purchased on market	64767.96	95,247	95,247
24/07/2024	MLC Investments Ltd (ACN 004 278 899)	Sold on market	-250811.75	-374,179	-374,179
25/07/2024	IOOF Investment Services Ltd (ACN 007 350 405)	Purchased on market	216526.99	324,385	324,385
25/07/2024	MLC Investments Ltd (ACN 004 278 899)	Sold on market	-644092.51	-961,967	-961,967
26/07/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-710.3	-1,098	-1,098
26/07/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-57.48	-87	-87
26/07/2024	Antares Capital Partners Ltd (ACN 066 081 114)	Sold on market	-67429.12	-99,309	-99,309
29/07/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-7490.41	-11,310	-11,310
29/07/2024	MLC Investments Ltd (ACN 004 278 899)	Sold on market	-82697.49	-124,382	-124,382
30/07/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Purchased on market	2475.59	3,859	3,859
30/07/2024	Antares Capital Partners Ltd (ACN 066 081 114)	Sold on market	-18784.9	-28,509	-28,509
31/07/2024	IOOF Investment	Sold on market	-3697.27	-5,675	-5,675

	Management Ltd (ACN 006 695 021)				
31/07/2024	MLC Investments Ltd (ACN 004 278 899)	Sold on market	-123186.26	-185,689	-185,689
31/07/2024	Antares Capital Partners Ltd (ACN 066 081 114)	Sold on market	-24558.82	-37,272	-37,272
1/08/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Purchased on market	339.09	534	534
2/08/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Purchased on market	28416	44,400	44,400
2/08/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Purchased on market	2117.89	3,289	3,289
3/08/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-568.89	-958	-958
5/08/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-1743.32	-2,919	-2,919
6/08/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-1988.63	-3,429	-3,429
6/08/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-1654.02	-2,782	-2,782
7/08/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-28563.02	-49,735	-49,735
8/08/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Purchased on market	25083.6	44,933	44,933
8/08/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-9630.47	-17,438	-17,438
9/08/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-16795.1	-29,790	-29,790
9/08/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Purchased on market	2.85	5	5
9/08/2024	MLC Investments Ltd (ACN 004 278 899)	Purchased on market	1532474.96	2,708,213	2,708,213
12/08/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-4835.3	-8,491	-8,491
12/08/2024	MLC Investments Ltd (ACN 004 278 899)	Purchased on market	486272.64	820,172	820,172
13/08/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-1802.56	-3,053	-3,053
14/08/2024	Oasis Funds Management Limited (ACN 106 045 050)	Sold on market	-2395.45	-4,009	-4,009
14/08/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-316.53	-556	-556
14/08/2024	IOOF Investment Services Ltd (ACN 007 350 405)	Purchased on market	30849.28	50,898	50,898

14/08/2024	MLC Investments Ltd (ACN 004 278 899)	Purchased on market	334156.12	550,716	550,716
15/08/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-1978.47	-3,387	-3,387
16/08/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-1120.89	-1,950	-1,950
16/08/2024	IOOF Investment Services Ltd (ACN 007 350 405)	Purchased on market	26066.51	44,581	44,581
19/08/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-3030.57	-5,362	-5,362
19/08/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-8631.64	-15,015	-15,015
19/08/2024	IOOF Investment Services Ltd (ACN 007 350 405)	Purchased on market	263897.25	457,837	457,837
20/08/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-8790.71	-15,380	-15,380
21/08/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Purchased on market	45524.73	80,163	80,163
21/08/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-8762.52	-15,463	-15,463
22/08/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-4545.02	-8,184	-8,184
22/08/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-8855.44	-15,583	-15,583
23/08/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-294.17	-565	-565
23/08/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-2870.08	-5,165	-5,165
26/08/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-918.41	-1,696	-1,696
27/08/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Purchased on market	2480.62	4,189	4,189
27/08/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-46.68	-83	-83
28/08/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Purchased on market	63028.94	129,786	129,786
29/08/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Purchased on market	1716.14	3,606	3,606
29/08/2024	MLC Investments Ltd (ACN 004 278 899)	Purchased on market	103829.47	228,151	228,151
2/09/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-1983.32	-4,605	-4,605

3/09/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-7557.42	-19,108	-19,108
3/09/2024	IOOF Investment Services Ltd (ACN 007 350 405)	Sold on market	-964191.17	-1,364,626	-1,364,626
3/09/2024	Antares Capital Partners Ltd (ACN 066 081 114)	Sold on market	-51836.84	-118,006	-118,006
4/09/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-204.23	-532	-532
5/09/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Purchased on market	9811.23	25,157	25,157
5/09/2024	MLC Investments Ltd (ACN 004 278 899)	Sold on market	-1134932.57	-2,831,403	-2,831,403
6/09/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Purchased on market	5032.17	12,903	12,903
9/09/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Purchased on market	1292.01	1,608	1,608
9/09/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-827.2	-2,200	-2,200
9/09/2024	MLC Investments Ltd (ACN 004 278 899)	Sold on market	-65783.4	-168,726	-168,726
10/09/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-198.16	-626	-626
11/09/2024	IOOF Investment Services Ltd (ACN 007 350 405)	Purchased on market	255356.88	622,518	622,518
11/09/2024	MLC Investments Ltd (ACN 004 278 899)	Purchased on market	537458.54	1,308,077	1,308,077
11/09/2024	Antares Capital Partners Ltd (ACN 066 081 114)	Purchased on market	393216.11	957,017	957,017
12/09/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-3385.2	-8,048	-8,048
12/09/2024	IOOF Investment Services Ltd (ACN 007 350 405)	Purchased on market	233726.54	559,690	559,690
12/09/2024	MLC Investments Ltd (ACN 004 278 899)	Purchased on market	491933.02	1,176,060	1,176,060
12/09/2024	Antares Capital Partners Ltd (ACN 066 081 114)	Purchased on market	359908.43	860,430	860,430
13/09/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-2172.25	-4,967	-4,967
13/09/2024	IOOF Investment Services Ltd (ACN 007 350 405)	Purchased on market	652336.72	1,460,613	1,460,613
13/09/2024	MLC Investments Ltd (ACN 004 278 899)	Purchased on market	1374696.09	3,072,939	3,072,939
13/09/2024	Antares Capital Partners Ltd (ACN 066 081 114)	Purchased on market	1010581.82	2,259,011	2,259,011
17/09/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-893.89	-2,150	-2,150
19/09/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-3174.29	-7,444	-7,444

19/09/2024	MLC Investments Ltd (ACN 004 278 899)	Sold on market	-262889.49	-617,520	-617,520
20/09/2024	Oasis Funds Management Limited (ACN 106 045 050)	Purchased on market	5.89	16	16
20/09/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-287.99	-697	-697
20/09/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Purchased on market	46.02	118	118
20/09/2024	IOOF Investment Services Ltd (ACN 007 350 405)	Purchased on market	1331365.83	2,921,584	2,921,584
20/09/2024	MLC Investments Ltd (ACN 004 278 899)	Purchased on market	2620230.68	5,704,232	5,704,232
20/09/2024	Antares Capital Partners Ltd (ACN 066 081 114)	Purchased on market	503912.85	1,103,978	1,103,978
23/09/2024	IOOF Investment Management Ltd (ACN 006 695 021)	Sold on market	-3304.39	-7,387	-7,387
23/09/2024	IOOF Investment Services Ltd (ACN 007 350 405)	Purchased on market	476216.23	1,043,876	1,043,876
23/09/2024	MLC Investments Ltd (ACN 004 278 899)	Purchased on market	940182.66	2,045,639	2,045,639
23/09/2024	Antares Capital Partners Ltd (ACN 066 081 114)	Purchased on market	180244.54	394,449	394,449

5. Associates

Name & ACN	Nature of association
Not applicable	

6. Addresses

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

Name	Address
Insignia Financial Ltd	Level 1, 800 Bourke Street Docklands Victoria 3008
TABCORP HOLDINGS LIMITED	Level 19, Tower 2, 727 Collins Street, MELBOURNE, VIC, AUSTRALIA, 3008
J.P. Morgan Nominees Australia Pty Limited	32/225 George Street The Rocks NSW 2000
OnePath Funds Management Limited	Level 1, 800 Bourke Street Docklands, VIC 3008
Oasis Funds Management Limited	Level 1, 800 Bourke Street Docklands, VIC 3008
OnePath Custodians Pty Limited	Level 1, 800 Bourke Street Docklands, VIC 3008
IOOF Investment Services Ltd	Level 1, 800 Bourke Street Docklands, VIC 3008
IOOF Investment Management Ltd	Level 1, 800 Bourke Street Docklands, VIC 3008
Bond Street Custodians Limited	50 Martin Place Sydney NSW 2000
Antares Capital Partners Ltd	30 'THE BOND', Level 3, 30 Hickson Road

	Millers Point NSW 2000
MLC Investments Limited	30 'THE BOND', Level 3, 30 Hickson Road Millers Point NSW 2000
National Nominees Limited	Level 1, 800 Bourke Street Docklands, VIC 3008
UBS Nominees Pty Ltd	Level 16, Chifley Tower, 2 Chifley Square Sydney NSW 2000

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