Form 603
Corporations Act 2001
Section 671B

Notice of Initial Substantial Holder

To: **STARPHARMA HLDGS LTD**
ACN/ARSN:

1. Details of substantial holder (1)

Name: FIL Limited and the entities listed in Annexure A ("FIL")
ACN/ARSN (if applicable)

The holder became a substantial holder on 06 December 2018

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)
COMMON STOCK	18,876,903	18,876,903	5.08%

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:

Refer to Annexure A

4. Details of present registered holders

The persons registered as holders of the securities referred to in paragraph 3 above are as follows:

Refer to Annexure A

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:

Date of Acquisition	Holder of Relevant Interest	Consideration (9)	Class and Number of Securities
			COMMON STOCK
10/10/2018	FIL	1.5125 AUD	127,823
11/30/2018	FIL	1.5600 AUD	183,599
12/03/2018	FIL	1.5636 AUD	22,590
12/03/2018	FIL	1.5636 AUD	38,914
12/04/2018	FIL	1.5505 AUD	22,482
12/04/2018	FIL	1.5505 AUD	38,726
12/05/2018	FIL	1.4836 AUD	26,183
12/05/2018	FIL	1.4836 AUD	45,104
12/06/2018	FIL	1.4500 AUD	167,768

12/06/2018	FIL	1.4500 AUD	288,996
		Total Buys	**778,586**
		Total Transition In	**183,599**

6. Associates

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

Refer to Annexure A



Sign Here _____

Dated: 10 December 2018
Jen Li
Head of Regulatory Reporting, Asia Pacific
Duly authorized under Powers of Attorney by and on behalf of FIL Limited

Annexure A

Investment Manager	Address	Custodian	Nature of Relevant Interest	Sum of Numerator Shares
FIL INVESTMENT MANAGEMENT (AUSTRALIA) LIMITED	Level 11, 167 Macquarie Street, Sydney, NSW 2000, Australia	JP MORGAN, BOURNEMOUTH (C)	Investment Discretion / Voting Power	571,491
		JPMORGAN CHASE BANK NA LDN		595,339
		NATIONAL ASTL BK MELBOURNE (S)		172,391
		NORTHERN TRUST LONDON (C)		55,669
		STATE STREET BANK AND TR CO		282,221
FIL INVESTMENT MANAGEMENT (HONG KONG) LIMITED	Level 21, Two Pacific Place, 88 Queensway, Admiralty, Hong Kong	BROWN BROS HARRIMN LTD LUX (C)		14,230,602
		CLEARSTREAM BANKING SA LUX (C)		793,611
FIL LIMITED	Pembroke Hall, 42 Crow Lane, Pembroke, Bermuda	HSBC BANK PLC (C)		1,489,643
FIL PENSION MANAGEMENT	Oakhill House, 130 Tonbridge Road, Hildenborough, Kent, England TN119DZ	HSBC BANK PLC (C)		685,936
Grand Total				**18,876,903**