TIGA Trading Pty Ltd

ABN 95 118 961 210

Level 39, 55 Collins Street, Melbourne Vic 3000
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15 January 2021

BY ASX ONLINE - 6 pages

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

Dear Sir/Madam,

Notice of initial substantial holder
Spacetalk Limited [ASX:SPA]

Attached is a Form 603 *Notice of initial substantial holder* dated 15 January 2021 in accordance with section 671B of the *Corporations Act 2001 (Cth)*.

Please note that this notice was not lodged within 2 business days of 23 September 2020 as required due to administrative oversight. A management review of internal procedures and systems has identified areas of improvement which is expected to prevent the issue from occurring again.

Yours sincerely,



AVEE WAISLITZ
Secretary

Form **603**

Corporations Act 2001
Section 671B

Notice of initial substantial holder

To: company name/scheme	**SPACETALK LIMITED**
ACN:	091 351 530

1. Details of substantial holder

Name	TIGA Trading Pty Ltd and each of the entities listed in the attached Annexure "A" to this notice.
ACN (if applicable)	118 961 210

The holder became a substantial holder on 23-Sep-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
Ordinary shares	13,208,088	13,268,088	8.03%

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
TIGA Trading Pty Ltd	Beneficial owner of voting shares	6,634,045 ordinary shares
Thorney Investment Group Australia Pty Ltd	By virtue of section 608 of the Corporations Act 2001	6,634,045 ordinary shares
Jamahjo Pty Ltd		
Thorney Technologies Ltd	Beneficial owner of voting shares	6,634,043 ordinary shares
Thorney Investment Group	Deemed relevant interest by virtue of section 608(3) of the Corporations Act 2001 (and section 608(1) for Thorney Management Services Pty Ltd) in shares purchased by Thorney Technologies Ltd	6,634,043 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
TIGA Trading Pty Ltd	UBS Nominees Pty Ltd	TIGA Trading Pty Ltd	6,634,045 ordinary shares
Thorney Technologies Ltd	HSBC Custody Nominees (Australia) Ltd	Thorney Technologies Ltd	6,634,043 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 per share	Number and class of securities
TIGA Trading Pty Ltd	16-Jul-20	$0.11 per share	279,070 ordinary shares
Thorney Technologies Ltd		$Nil	279,070 ordinary shares
TIGA Trading Pty Ltd	06-Aug-20	$0.12 per share	240,781 ordinary shares
Thorney Technologies Ltd		$Nil	240,781 ordinary shares
TIGA Trading Pty Ltd	09-Sep-20	$0.14 per share	318,798 ordinary shares
Thorney Technologies Ltd		$Nil	318,798 ordinary shares
TIGA Trading Pty Ltd	11-Sep-20	$0.16 per share	330,274 ordinary shares
Thorney Technologies Ltd		$Nil	330,273 ordinary shares
TIGA Trading Pty Ltd	17-Sep-20	$0.15 per share	5,013 ordinary shares
Thorney Technologies Ltd		$Nil	5,013 ordinary shares
TIGA Trading Pty Ltd	22-Sep-20	$0.15 per share	223,966 ordinary shares
Thorney Technologies Ltd		$Nil	223,966 ordinary shares
TIGA Trading Pty Ltd	23-Sep-20	$0.15 per share	84,391 ordinary shares
Thorney Technologies Ltd		$Nil	84,391 ordinary shares
TIGA Trading Pty Ltd	24-Sep-20	$0.15 per share	31,356 ordinary shares
Thorney Technologies Ltd		$Nil	31,357 ordinary shares
TIGA Trading Pty Ltd	25-Sep-20	$0.15 per share	226,380 ordinary shares
Thorney Technologies Ltd		$Nil	226,380 ordinary shares
TIGA Trading Pty Ltd	28-Sep-20	$0.15 per share	76,769 ordinary shares
Thorney Technologies Ltd		$Nil	76,768 ordinary shares
TIGA Trading Pty Ltd	29-Sep-20	$0.15 per share	101,325 ordinary shares
Thorney Technologies Ltd		$Nil	101,326 ordinary shares
TIGA Trading Pty Ltd	30-Sep-20	$0.15 per share	26,289 ordinary shares
Thorney Technologies Ltd		$Nil	26,289 ordinary shares
TIGA Trading Pty Ltd	01-Oct-20	$0.15 per share	75,937 ordinary shares
Thorney Technologies Ltd		$Nil	75,937 ordinary shares
TIGA Trading Pty Ltd	02-Oct-20	$0.15 per share	68,300 ordinary shares
Thorney Technologies Ltd		$Nil	68,300 ordinary shares
TIGA Trading Pty Ltd	27-Oct-20	$0.14 per share	67,143 ordinary shares
Thorney Technologies Ltd		$Nil	67,144 ordinary shares
TIGA Trading Pty Ltd	28-Oct-20	$0.14 per share	163,948 ordinary shares
Thorney Technologies Ltd		$Nil	163,947 ordinary shares
TIGA Trading Pty Ltd	29-Oct-20	$0.15 per share	268,909 ordinary shares
Thorney Technologies Ltd		$Nil	268,909 ordinary shares
TIGA Trading Pty Ltd	13-Nov-20	$0.13 per share	23,960 ordinary shares
Thorney Technologies Ltd		$Nil	23,960 ordinary shares
TIGA Trading Pty Ltd	17-Nov-20	$0.13 per share	59,000 ordinary shares
Thorney Technologies Ltd		$Nil	59,000 ordinary shares
TIGA Trading Pty Ltd	18-Nov-20	$0.13 per share	52,563 ordinary shares
Thorney Technologies Ltd		$Nil	52,563 ordinary shares

5. Consideration (continued)

Holder of relevant interest	Date of acquisition	Cash consideration per share	Number and class of securities
TIGA Trading Pty Ltd	20-Nov-20	$0.13 per share	205,187 ordinary shares
Thorney Technologies Ltd		$Nil	205,187 ordinary shares
TIGA Trading Pty Ltd	23-Nov-20	$0.13 per share	70,987 ordinary shares
Thorney Technologies Ltd		$Nil	70,986 ordinary shares
TIGA Trading Pty Ltd	24-Nov-20	$0.13 per share	138,142 ordinary shares
Thorney Technologies Ltd		$Nil	138,143 ordinary shares
TIGA Trading Pty Ltd	25-Nov-20	$0.13 per share	68,899 ordinary shares
Thorney Technologies Ltd		$Nil	68,898 ordinary shares
TIGA Trading Pty Ltd	26-Nov-20	$0.13 per share	239,649 ordinary shares
Thorney Technologies Ltd		$Nil	239,649 ordinary shares
TIGA Trading Pty Ltd	27-Nov-20	$0.13 per share	129,359 ordinary shares
Thorney Technologies Ltd		$Nil	129,360 ordinary shares
TIGA Trading Pty Ltd	30-Nov-20	$0.13 per share	162,254 ordinary shares
Thorney Technologies Ltd		$Nil	162,254 ordinary shares
TIGA Trading Pty Ltd	14-Jan-21	$0.12 per share	196,509 ordinary shares
Thorney Technologies Ltd		$Nil	196,508 ordinary shares
TIGA Trading Pty Ltd	15-Jan-21	$0.12 per share	30,000 ordinary shares
Thorney Technologies Ltd		$Nil	30,000 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
Thorney Investment Group Australia Pty Ltd ACN 117 488 892	Thorney Investment Group Australia Pty Ltd is the registered holder of all the issued shares in TIGA Trading Pty Ltd
Jamahjo Pty Ltd ACN 117 488 696	Jamahjo Pty Ltd is the registered holder of all the issued shares in Thorney Investment Group Australia Pty Ltd
Thorney Technologies Ltd, ACN 096 782 188	Associate under section 12 of the Corporations Act for the purposes of this investment

7. Addresses

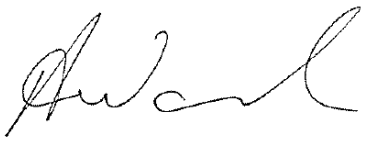
The addresses of persons named in this form are as follows:

Name	Address
TIGA Trading Pty Ltd ACN 118 961 210	Level 39, 55 Collins Street, Melbourne 3000
Thorney Investment Group Australia Pty Ltd ACN 117 488 892	Level 39, 55 Collins Street, Melbourne 3000
Jamahjo Pty Ltd ACN 117 488 696	c/- Wilson Pateras, Ground Floor, 40 River Boulevard, Richmond 3121
Thorney Technologies Ltd, ACN 096 782 188	Level 39, 55 Collins Street, Melbourne 3000

Signature

Print name AVEE WAISLITZ Capacity SECRETARY

Sign here 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.



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AVEE WAISLITZ
Secretary

SUBSTANTIAL HOLDERS - ENTITY DETAILS

Entity	Address
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	
Thorney Technologies Ltd, ACN 096 782 188	Level 39, 55 Collins Street, Melbourne 3000