Form 603

Corporations Act 2001

Section 671B

Notice of initial substantial holder

To Company Name/Scheme: Spacetalk Ltd (SPA)

ACN/ARSN: 091 351 530

1. Details of substantial holder (1)

Name: Regal Funds Management Pty Ltd (RFM)

ACN/ARSN (if applicable): 107 576 821

The holder became a substantial holder on **10/11/2021**

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	18,501,760	18,501,760	*9.47%

*The % substantial is based on the shares on issue of 195,361,945 as disclosed by the Company on 10-11-2021.

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
REGAL FUNDS MANAGEMENT PTY LIMITED	REGAL FUNDS MANAGEMENT PTY LIMITED HAS A RELEVANT INTEREST IN ITS CAPACITY AS INVESTMENT MANAGER AND/OR TRUSTEE	18,501,760 ORDINARY

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)	Nature of relevant interest (6)	Class and number of securities	Person's votes
MERRILL LYNCH INTERNATIONAL LIMITED	MERRILL LYNCH (AUS) NOMINEES PTY LTD	MERRILL LYNCH INTERNATIONAL LIMITED	HOLDER OF SHARES	105,000 ORDINARY	105,000
CREDIT SUISSE AG	CS THIRD NOMINEES PTY LIMITED	CREDIT SUISSE AG	HOLDER OF SHARES	18,396,760 ORDINARY	18,396,760

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
	See Annexure 1		

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
NOT APPLICABLE	

7. Addresses

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

Name	Address
Kenny Ho	LEVEL 47 GATEWAY 1 MACQUARIE PLACE SYDNEY NSW 2000

Signature

print name Kenny Ho capacity Company Secretary

sign here  date 12/11/2021

Annexure 1

Consideration

Date	Person whose relevant interest changed	Nature of Change	Consideration given in relation to change	Number of securities affected	Class of securities	Persons votes affected
15/07/2021	Regal Funds Management	Buy	4526.95	24470	Ordinary	24470
15/07/2021	Regal Funds Management	Buy	197300.00	1000000	Ordinary	1000000
16/07/2021	Regal Funds Management	Buy	9267.25	48775	Ordinary	48775
19/07/2021	Regal Funds Management	Buy	7102.34	38391	Ordinary	38391
19/08/2021	Regal Funds Management	Buy	25497.79	134624	Ordinary	134624
20/08/2021	Regal Funds Management	Buy	31702.58	165376	Ordinary	165376
2/11/2021	Regal Funds Management	Buy	9185.18	40823	Ordinary	40823
2/11/2021	Regal Funds Management	Buy	22500.00	100000	Ordinary	100000
3/11/2021	Regal Funds Management	Buy	39178.82	176243	Ordinary	176243
5/11/2021	Regal Funds Management	Buy	2715034.26	14289654	Ordinary	14289654
10/11/2021	Regal Funds Management	Buy	25141.00	122639	Ordinary	122639