

Form 603Corporations Law
Section 671B**Notice of initial substantial holder**To Company Name/Scheme **IMF BENTHAM LIMITED****1. Details of substantial holder (1)**Name **Eley Griffiths Group Pty Limited**ABN (if applicable) **66 102 271 812**The holder became a substantial holder on **10/04/2018****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	Persons' votes (5)	Voting power (6)
Ordinary Shares	9,191,643	9,191,643	5.31%

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
See schedule 1		

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
Eley Griffiths Group Pty Ltd	National Nominees Limited	N/A	2,514,943
Eley Griffiths Group Pty Ltd	State Street Nominees Limited	N/A	2,010,752
Eley Griffiths Group Pty Ltd	JPMorgan Nominees Limited	N/A	808,735
Eley Griffiths Group Pty Ltd	BNP Paribas Nominees Limited	N/A	663,816
Eley Griffiths Group Pty Ltd	JPMorgan Nominees Limited	N/A	2,583,277
Eley Griffiths Group Pty Ltd	BNP Paribas Nominees Limited	N/A	356,230
Eley Griffiths Group Pty Ltd	National Nominees Limited	N/A	253,890

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
Eley Griffiths Group Pty Ltd	19/10/2017-10/04/2018			2,514,943
Eley Griffiths Group Pty Ltd	19/10/2017-10/04/2018			2,010,752
Eley Griffiths Group Pty Ltd	19/10/2017-10/04/2018			808,735
Eley Griffiths Group Pty Ltd	19/10/2017-10/04/2018			663,816
Eley Griffiths Group Pty Ltd	19/10/2017-10/04/2018			2,583,277
Eley Griffiths Group Pty Ltd	19/10/2017-10/04/2018			356,230
Eley Griffiths Group Pty Ltd	19/10/2017-10/04/2018			253,890

6. Associates

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

Name and ACN (if applicable)	Nature of association
Not applicable	

7. Addresses

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

Name	Address
Lachlan Ridhalgh	Level 24, Governor Phillip Tower, 1 Farrer Place, Sydney NSW 2000

Signature

print name

Lachlan Ridhalgh

Position: Dealer

sign here



date 12/04/2018