## Form 603

Corporations Law Section 671B

# Notice of initial substantial holder

To Company Name/Scheme ELANOR COMMERCIAL PROPERTY FUND

ACN/ARSN	636 623 099 & 636 623 517
1. Details of substantial holder (	I)
Name	PERPETUAL LIMITED and its related bodies corporate
ACN (if applicable)	000 431 827

The holder became a substantial holder on \_06\_ /\_12\_/\_2019\_

#### 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	11,631,458	11,631,458	5.69%

#### 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
Refer annexure1 & 2		

#### 4. Details of present registered holders

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

Holder of relevant interest	Registered holder of securities	Persons entitled to be registered as holder (8)	Class and number of securities
Refer annexure 1			

#### 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	Consideratio	n (9)	Class and number of securities
Refer annexure 3		Cash	Non - Cash	

### 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
Perpetual Investment Management Limited	Related bodies corporate of Perpetual Limited
Perpetual Trustee Company Limited	Related bodies corporate of Perpetual Limited

### 6. Addresses

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

Name	Address
Perpetual Limited	18/123 Pitt Street Sydney, NSW 2000
Perpetual Investment Management Limited	18/123 Pitt Street Sydney, NSW 2000
Perpetual Trustee Company Limited	18/123 Pitt Street Sydney, NSW 2000

Signature

Print name CHRIS GREEN

Capacity COMPANY SECRETARY

#### ANNEXURE 1 - Perpetual Investments Account Codes & Details

Perpetual Investment Management Limited (PIML), subsidiary of Perpetual Limited, as Responsible Entity for:

INTERNAL CODE	REGISTRATION DETAILS
17	HSBC Custody Nominees (Australia) Limited GPO Box 5302 Sydney NSW 2001
26	HSBC Custody Nominees (Australia) Limited GPO Box 5302 Sydney NSW 2001
33	HSBC Custody Nominees (Australia) Limited GPO Box 5302 Sydney NSW 2001
118	HSBC Custody Nominees (Australia) Limited GPO Box 5302 Sydney NSW 2001
212	HSBC Custody Nominees (Australia) Limited GPO Box 5302 Sydney NSW 2001
649	HSBC Custody Nominees (Australia) Limited GPO Box 5302 Sydney NSW 2001
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653	HSBC Custody Nominees (Australia) Limited GPO Box 5302 Sydney NSW 2001
651	HSBC Custody Nominees (Australia) Limited GPO Box 5302 Sydney NSW 2001
654	HSBC Custody Nominees (Australia) Limited GPO Box 5302 Sydney NSW 2001
670	HSBC Custody Nominees (Australia) Limited GPO Box 5302 Sydney NSW 2001
695	HSBC Custody Nominees (Australia) Limited GPO Box 5302 Sydney NSW 2001
774	HSBC Custody Nominees (Australia) Limited GPO Box 5302 Sydney NSW 2001

855	HSBC Custody Nominees (Australia) Limited GPO Box 5302 Sydney NSW 2001
2093	HSBC Custody Nominees (Australia) Limited GPO Box 5302 Sydney NSW 2001
2095	HSBC Custody Nominees (Australia) Limited GPO Box 5302 Sydney NSW 2001
2124	HSBC Custody Nominees (Australia) Limited GPO Box 5302 Sydney NSW 2001
2125	HSBC Custody Nominees (Australia) Limited GPO Box 5302 Sydney NSW 2001
2127	HSBC Custody Nominees (Australia) Limited GPO Box 5302 Sydney NSW 2001
2128	HSBC Custody Nominees (Australia) Limited GPO Box 5302 Sydney NSW 2001
2199	HSBC Custody Nominees (Australia) Limited GPO Box 5302 Sydney NSW 2001
2210	HSBC Custody Nominees (Australia) Limited GPO Box 5302 Sydney NSW 2001
2219	HSBC Custody Nominees (Australia) Limited GPO Box 5302 Sydney NSW 2001
2130	HSBC Custody Nominees (Australia) Limited GPO Box 5302 Sydney NSW 2001
2089	RBC Investor Services Australia Nominees Pty Limited <picredit> GPO Box 5430 Sydney NSW 2001</picredit>
2086	RBC Investor Services Australia Nominees Pty Ltd <pi a="" c="" credit=""> GPO Box 5430 Sydney NSW 2001</pi>
106	RBC Investor Services Australia Nominees Pty Ltd <pi a="" c="" pooled=""> GPO Box 5430 Sydney NSW 2001</pi>
133	RBC Investor Services Australia Nominees Pty Ltd <pi a="" c="" pooled=""> GPO Box 5430 Sydney NSW 2001</pi>

323	RBC Investor Services Australia Nominees Pty Ltd <pi a="" c="" pooled=""> GPO Box 5430 Sydney NSW 2001</pi>	
669	RBC Investor Services Australia Nominees Pty Ltd <pi a="" c="" pooled=""> GPO Box 5430 Sydney NSW 2001</pi>	
139	RBC Investor Services Australia Nominees Pty Ltd <piqte2 a="" c=""> GPO Box 5430 Sydney NSW 2001</piqte2>	
44	UBS Nominees Pty Ltd Level 16 Chifley Tower 2 Chifley Square Sydney NSW 2000	
108	UBS Nominees Pty Ltd Level 16, Chifley Tower 2 Chifley Square Sydney NSW 2000	
414	UBS Nominees Pty Ltd Level 16 Chifley Tower 2 Chifley Square Sydney NSW 2000	
696	UBS Nominees Pty Ltd Level 16 Chifley Tower 2 Chifley Square Sydney NSW 2000	
941	UBS Nominees Pty Ltd Level 16 Chifley Tower 2 Chifley Square Sydney NSW 2000	

Perpetual Investment Management Limited (PIML), subsidiary of Perpetual Limited, as Trustee for:

ALL 'SS' CODES	HSBC Custody Nominees (Australia) Limited GPO Box 5302 Sydney NSW 2001
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Perpetual Investment Management Limited (PIML), subsidiary of Perpetual Limited, under Investment Management Agreements with:

INTERNAL CODE	REGISTRATION DETAILS
227	BNP Paribas Nominees Pty Ltd PO Box R209 Royal Exchange NSW 1225
248	BNP Paribas Noms Pty Ltd P.O. Box R209 Royal Exchange Sydney NSW 1225
702	BNP Paribas Nominees Pty Ltd PO Box R209 Royal Exchange NSW 1225
740	BNP Paribas Nominees Pty Ltd PO Box R209 Royal Exchange NSW 1225

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BNP Paribas Nominees Pty Ltd PO Box R209 Royal Exchange NSW 1225		
BNP Paribas Nominees Pty Ltd PO Box R209 Royal Exchange NSW 1225		
Citicorp Nominees Pty Ltd GPO Box 764G Melbourne VIC 3001		
Citicorp Nominees Pty Ltd GPO Box 764G Melbourne VIC 3001		
Citicorp Nominees Pty Ltd GPO Box 764G Melbourne VIC 3001		
Citicorp Nominees Pty Ltd GPO Box 764G Melbourne VIC 3001		
Northern Trust Company Melbourne Branch: HSBC Custody Nominees (Australia) Limited GPO Box 5302 Sydney NSW 2001		
Citicorp Nominees Pty Ltd GPO Box 764G Melbourne VIC 3001		
Northern Trust Company Melbourne Branch: HSBC Custody Nominees (Australia) Limited GPO Box 5302 Sydney NSW 2001		
State Street Limited 420 George Street Sydney NSW 2000		
HSBC Custody Nominees (Australia) Limited GPO Box 5302 Sydney NSW 2001		
Northern Trust Company Melbourne Branch: HSBC Custody Nominees (Australia) Limited GPO Box 5302 Sydney NSW 2001		

HSBC Custody Nominees (Australia) Limited GPO Box 5302 Sydney NSW 2001		
State Street Limited 420 George Street Sydney NSW 2000		
JPMorgan Nominees Australia Limited Locked Bag 20049 Melbourne VIC 3001		
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JPMorgan Nominees Australia Limited Locked Bag 20049 Melbourne VIC 3001		
JPMorgan Nominees Australia Limited Locked Bag 20049 Melbourne VIC 3001		
National Nominees Pty Ltd PO Box 1406 Melbourne VIC 3001		

787	National Nominees Pty Ltd PO Box 1406 Melbourne VIC 3001	
2083	National Nominees Pty Ltd PO Box 1406 Melbourne VIC 3001	
2097	National Nominees Pty Ltd PO Box 1406 Melbourne VIC 3001	
2160	National Nominees Pty Ltd PO Box 1406 Melbourne VIC 3001	
2220	National Nominees Pty Ltd PO Box 1406 Melbourne VIC 3001	

Perpetual Trustee Company Limited as trustee, custodian or nominee INTERNAL CODE REGISTRATION DETAILS					
T2	Perpetual Trustee Company Limited GPO Box 4172 Sydney NSW 2001				
тз	The Trust Company Limited GPO Box 4270 Sydney NSW 2001				
τ4	Perpetual Trustee Company Limited GPO Box 4172 Sydney NSW 2001				
T6	Perpetual Trustee Company Limited GPO Box 4172 Sydney NSW 2001				
Т7	Perpetual Trustee Company Limited GPO Box 4172 Sydney NSW 2001				

## **ANNEXURE 2**

### PRESENT RELEVANT INTERESTS

ASXCode	Internal Code	Holding
ECF	17	893,039
ECF	654	738,419
ECF	2127	2,000,000
ECF	653	8,000,000

### **ANNEXURE 3**

## CHANGES IN RELEVANT INTERESTS

Account	Security	Volume	Value	AsAtDate
17	ECF	893,039	1,116,299	03/12/2019
654	ECF	738,419	923,024	03/12/2019
2127	ECF	2,000,000	2,500,000	29/10/2019
653	ECF	8,000,000	10,000,000	29/10/2019