Rule 3.19A.2

Appendix 3Y

Change of Director's Interest Notice

Information or documents not available now must be given to ASX as soon as available. Information and documents given to ASX become ASX's property and may be made public.

Introduced 30/09/01 Amended 01/01/11

Name of entity	IMF Bentham Limited
ABN	45 067 298 088

We (the entity) give ASX the following information under listing rule 3.19A.2 and as agent for the director for the purposes of section 205G of the Corporations Act.

Name of Director	Andrew Saker
Date of last notice	5 November 2019

Part 1 - Change of director's relevant interests in securities

In the case of a trust, this includes interests in the trust made available by the responsible entity of the trust

Note: In the case of a company, interests which come within paragraph (i) of the definition of "notifiable interest of a director" should be disclosed in this part.

Direct or indirect interest	Direct and Indirect
Nature of indirect interest (including registered holder) Note: Provide details of the circumstances giving rise to the relevant interest.	Director and shareholder of Saker Investments Pty Ltd (as trustee for the Andrew Saker Superannuation Fund) and of Jesta Investments Pty Ltd (as trustee for the Saker Family Trust)
Date of change	20 December 2019

⁺ See chapter 19 for defined terms.

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No. of securities held prior to change	Shares: • 178,863 - Saker Investments Pty Ltd (as trustee for the Andrew Saker Superannuation Fund)
	Secured Notes: • 100 – Andrew Saker
	Performance Rights: • 474,580 (FY2016 – vested) – Jesta Investments Pty Ltd (as trustee for the Saker Family Trust) • 543,587 (FY2017 – vested) – Jesta Investments Pty Ltd (as trustee for the Saker Family Trust) • 420,104 (FY2018 – unvested) – Jesta Investments Pty Ltd (as trustee for the Saker Family Trust) • 410,810 (FY2019 – unvested) – Jesta Investments Pty Ltd (as trustee for the Saker Family Trust)
Class	Secured Notes
Number acquired	Nil
Number disposed	100
Value/Consideration Note: If consideration is non-cash, provide details and estimated valuation	\$1,000 per note plus early redemption premium of 1%
No. of securities held after change	Shares: • 178,863 - Saker Investments Pty Ltd (as trustee for the Andrew Saker Superannuation Fund)
	Performance Rights: • 474,580 (FY2016 – vested) – Jesta Investments Pty Ltd (as trustee for the Saker Family Trust) • 543,587 (FY2017 – vested) – Jesta Investments Pty Ltd (as trustee for the Saker Family Trust) • 420,104 (FY2018 – unvested) – Jesta Investments Pty Ltd (as trustee for the Saker Family Trust) • 410,810 (FY2019 – unvested) – Jesta Investments Pty Ltd (as trustee for the Saker Family Trust)

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⁺ See chapter 19 for defined terms.

Nature of change Example: on-market trade, off-market trade, exercise of options, issue of securities under dividend reinvestment plan, participation in buyback	Early redemption of Secured Notes

Part 2 – Change of director's interests in contracts

Note: In the case of a company, interests which come within paragraph (ii) of the definition of "notifiable interest of a director" should be disclosed in this part.

Detail of contract	N/A
Nature of interest	N/A
Name of registered holder (if issued securities)	N/A
Date of change	N/A
No. and class of securities to which interest related prior to change Note: Details are only required for a contract in relation to which the interest has changed	N/A
Interest acquired	N/A
Interest disposed	N/A
Value/Consideration Note: If consideration is non-cash, provide details and an estimated valuation	N/A
Interest after change	N/A

Part 3 – +Closed period

Were the interests in the securities or contracts detailed above traded during a +closed period where prior written clearance was required?	No
If so, was prior written clearance provided to allow the trade to proceed during this period?	N/A
If prior written clearance was provided, on what date was this provided?	N/A

⁺ See chapter 19 for defined terms.

Rule 3.19A.2

Appendix 3Y

Change of Director's Interest Notice

Information or documents not available now must be given to ASX as soon as available. Information and documents given to ASX become ASX's property and may be made public.

Introduced 30/09/01 Amended 01/01/11

Name of entity	IMF Bentham Limited
ABN	45 067 298 088

We (the entity) give ASX the following information under listing rule 3.19A.2 and as agent for the director for the purposes of section 205G of the Corporations Act.

Name of Director	Christine Feldmanis
Date of last notice	17 October 2019

Part 1 - Change of director's relevant interests in securities

In the case of a trust, this includes interests in the trust made available by the responsible entity of the trust

Note: In the case of a company, interests which come within paragraph (i) of the definition of "notifiable interest of a director" should be disclosed in this part.

Direct or indirect interest	Indirect
Nature of indirect interest (including registered holder) Note: Provide details of the circumstances giving rise to the relevant interest.	Director and shareholder of Feldmanis & Associates Pty Ltd (as trustee for the Feldmanis Superannuation Fund)
Date of change	20 December 2019
No. of securities held prior to change	Shares: 25,000 - Feldmanis & Associates Pty Ltd (as trustee for the Feldmanis Superannuation Fund) Secured Notes (7.40% fixed rate notes): 30 - Feldmanis & Associates Pty Ltd (as trustee for the Feldmanis Superannuation Fund)
Class	Secured Notes
Number acquired	50

⁺ See chapter 19 for defined terms.

Number disposed	Nil
Value/Consideration Note: If consideration is non-cash, provide details and estimated valuation	\$1,000 per note plus 1% early redemption premium
No. of securities held after change	Shares: 25,000 - Feldmanis & Associates Pty Ltd (as trustee for the Feldmanis Superannuation Fund) Secured Notes (5.65% fixed rate notes): 80 - Feldmanis & Associates Pty Ltd (as trustee for the Feldmanis Superannuation Fund)
Nature of change Example: on-market trade, off-market trade, exercise of options, issue of securities under dividend reinvestment plan, participation in buyback	Early redemption of Secured Notes and purchase of additional Notes

Part 2 – Change of director's interests in contracts

Note: In the case of a company, interests which come within paragraph (ii) of the definition of "notifiable interest of a director" should be disclosed in this part.

Detail of contract	N/A
Nature of interest	N/A
Name of registered holder (if issued securities)	N/A
Date of change	N/A
No. and class of securities to which interest related prior to change Note: Details are only required for a contract in relation to which the interest has changed	N/A
Interest acquired	N/A
Interest disposed	N/A
Value/Consideration Note: If consideration is non-cash, provide details and an estimated valuation	N/A
Interest after change	N/A

 $[\]boldsymbol{+}$ See chapter 19 for defined terms.

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Part 3 – ⁺Closed period

Were the interests in the securities or contracts detailed	No
above traded during a +closed period where prior written	
clearance was required?	
If so, was prior written clearance provided to allow the	N/A
trade to proceed during this period?	
If prior written clearance was provided, on what date was	N/A
this provided?	

⁺ See chapter 19 for defined terms.