

Form 603

Corporations Law
Section 671B

Notice of initial substantial holder

To: Company Name/Scheme Enero Group Limited

ACN/ARSN 091 524 515

1. Details of substantial holder (1)

Name Bank of America Corporation and its related bodies corporate (See Appendix C)

ACN/ARSN (if applicable) _____

The holder became a substantial holder on: 24 March 2020

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	4,578,369	4,578,369	5.32%

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
Merrill Lynch (Australia) Futures Ltd	Power to control voting and/or disposal of securities in its capacity as ultimate beneficial owner having a principal position.	Ordinary 2,030,092
Merrill Lynch International (Australia) Ltd	Borrowing of securities pursuant to a Prime Brokerage Agreement (see Appendix B), with power to control the voting and/or disposal of borrowed securities.	Ordinary 2,548,277

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
Merrill Lynch (Australia) Futures Ltd	Merrill Lynch (Australia) Nominees Pty Ltd	Merrill Lynch (Australia) Futures Ltd	Ordinary 2,030,092
Merrill Lynch International (Australia) Ltd	Merrill Lynch (Australia) Nominees Pty Ltd	Merrill Lynch International (Australia) Ltd	Ordinary 2,548,277

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
		Cash	Non-cash	
Please see Annexure A.				

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
Merrill Lynch (Australia) Futures Ltd	Related body corporate
Merrill Lynch (Australia) Nominees Pty Ltd	Related body corporate
Merrill Lynch International (Australia) Ltd	Related body corporate

7. Addresses

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

Name	Addresses
Bank of America Corporation	100 North Tryon Street, Charlotte, North Carolina, 28255, USA
Merrill Lynch (Australia) Futures Ltd	Level 38, Governor Phillip Tower, 1 Farrer Place, Sydney NSW 2000, Australia
Merrill Lynch (Australia) Nominees Pty Ltd	Level 19, 120 Collins St, Melbourne Vic 3000, Australia
Merrill Lynch International (Australia) Ltd	Level 38, Governor Phillip Tower, 1 Farrer Place, Sydney NSW 2000, Australia

SIGNATURE

Print Name: Kelvin Kwok

Capacity: Authorised signatory

Sign Here:



Date: 26 March 2020



Appendix A

Date of change	Person whose relevant interest changed	Nature of change (4)	Consideration (5)	Class (6) of securities	Securities affected	Person's votes affected	Remark
11/25/2019	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(1,453)	(1,453)	Refer to App. B
11/27/2019	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(249,459)	(249,459)	Refer to App. B
11/27/2019	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(51,968)	(51,968)	Refer to App. B
11/28/2019	Merrill Lynch International (Australia) Limited	Securities borrowed	N/A	Ordinary	179,635	179,635	Refer to App. B
11/29/2019	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(466)	(466)	Refer to App. B
11/29/2019	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(179,635)	(179,635)	Refer to App. B
12/2/2019	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(179,456)	(179,456)	Refer to App. B
12/2/2019	Merrill Lynch International (Australia) Limited	Securities borrowed	N/A	Ordinary	179,456	179,456	Refer to App. B
12/5/2019	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(157,091)	(157,091)	Refer to App. B
12/5/2019	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(20,854)	(20,854)	Refer to App. B
12/5/2019	Merrill Lynch International (Australia) Limited	Securities borrowed	N/A	Ordinary	177,945	177,945	Refer to App. B
12/9/2019	Merrill Lynch International (Australia) Limited	Securities borrowed	N/A	Ordinary	177,945	177,945	Refer to App. B
12/11/2019	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(450,434)	(450,434)	Refer to App. B
12/11/2019	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(22,365)	(22,365)	Refer to App. B
12/11/2019	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(177,945)	(177,945)	Refer to App. B
12/11/2019	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(171,311)	(171,311)	Refer to App. B
12/11/2019	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(177,945)	(177,945)	Refer to App. B
12/13/2019	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(1,101)	(1,101)	Refer to App. B

12/16/2019	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(4,414)	(4,414)	Refer to App. B
12/19/2019	Merrill Lynch International (Australia) Limited	Securities borrowed	N/A	Ordinary	95,759	95,759	Refer to App. B
12/20/2019	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(371)	(371)	Refer to App. B
12/20/2019	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(14,879)	(14,879)	Refer to App. B
12/23/2019	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(76,594)	(76,594)	Refer to App. B
12/23/2019	Merrill Lynch International (Australia) Limited	Securities borrowed	N/A	Ordinary	91,219	91,219	Refer to App. B
12/27/2019	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(321)	(321)	Refer to App. B
1/2/2020	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(3,337)	(3,337)	Refer to App. B
1/9/2020	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(4,676)	(4,676)	Refer to App. B
1/9/2020	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(257)	(257)	Refer to App. B
1/10/2020	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(59,485)	(59,485)	Refer to App. B
1/10/2020	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(323,451)	(323,451)	Refer to App. B
1/10/2020	Merrill Lynch International (Australia) Limited	Securities borrowed	N/A	Ordinary	464,546	464,546	Refer to App. B
1/10/2020	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(86,543)	(86,543)	Refer to App. B
1/13/2020	Merrill Lynch International (Australia) Limited	Securities borrowed	N/A	Ordinary	462,614	462,614	Refer to App. B
1/20/2020	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(1,142)	(1,142)	Refer to App. B
1/22/2020	Merrill Lynch International (Australia) Limited	Securities borrowed	N/A	Ordinary	847,951	847,951	Refer to App. B
1/24/2020	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(326)	(326)	Refer to App. B
1/28/2020	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(1,026)	(1,026)	Refer to App. B
1/29/2020	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(460,120)	(460,120)	Refer to App. B
1/29/2020	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(339,984)	(339,984)	Refer to App. B

1/29/2020	Merrill Lynch International (Australia) Limited	Securities borrowed	N/A	Ordinary	801,456	801,456	Refer to App. B
1/30/2020	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(75,438)	(75,438)	Refer to App. B
1/30/2020	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(124,562)	(124,562)	Refer to App. B
2/5/2020	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(4,031)	(4,031)	Refer to App. B
2/14/2020	Merrill Lynch International (Australia) Limited	Securities borrowed	N/A	Ordinary	567,695	567,695	Refer to App. B
2/14/2020	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(491,577)	(491,577)	Refer to App. B
2/17/2020	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(336,795)	(336,795)	Refer to App. B
2/17/2020	Merrill Lynch International (Australia) Limited	Securities borrowed	N/A	Ordinary	566,112	566,112	Refer to App. B
2/17/2020	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(230,410)	(230,410)	Refer to App. B
2/19/2020	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(566,112)	(566,112)	Refer to App. B
2/19/2020	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(230,900)	(230,900)	Refer to App. B
2/19/2020	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(847,951)	(847,951)	Refer to App. B
2/19/2020	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(895,173)	(895,173)	Refer to App. B
3/3/2020	Merrill Lynch International (Australia) Limited	Securities borrowed	N/A	Ordinary	2,531,756	2,531,756	Refer to App. B
3/6/2020	Merrill Lynch International (Australia) Limited	Securities borrowed	N/A	Ordinary	574,951	574,951	Refer to App. B
3/10/2020	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(574,951)	(574,951)	Refer to App. B
3/10/2020	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(625,049)	(625,049)	Refer to App. B
3/10/2020	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(74,994)	(74,994)	Refer to App. B
3/12/2020	Merrill Lynch International (Australia) Limited	Securities borrowed	N/A	Ordinary	1,516,570	1,516,570	Refer to App. B
3/13/2020	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(3,374)	(3,374)	Refer to App. B
3/16/2020	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(375,000)	(375,000)	Refer to App. B

3/16/2020	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(296,632)	(296,632)	Refer to App. B
3/17/2020	Merrill Lynch International (Australia) Limited	Securities borrowed	N/A	Ordinary	375,000	375,000	Refer to App. B
3/17/2020	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(74,994)	(74,994)	Refer to App. B
3/18/2020	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(375,000)	(375,000)	Refer to App. B
3/18/2020	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(766,570)	(766,570)	Refer to App. B
3/18/2020	Merrill Lynch International (Australia) Limited	Securities returned	N/A	Ordinary	(358,430)	(358,430)	Refer to App. B
3/23/2020	Merrill Lynch International (Australia) Limited	Securities borrowed	N/A	Ordinary	1,074,994	1,074,994	Refer to App. B
3/18/2020	Merrill Lynch (Australia) Futures Ltd	BUY	1,408,000	Ordinary	800,000	800,000	N/A
3/18/2020	Merrill Lynch (Australia) Futures Ltd	BUY	582	Ordinary	307	307	N/A
3/23/2020	Merrill Lynch (Australia) Futures Ltd	BUY	947	Ordinary	519	519	N/A
3/18/2020	Merrill Lynch (Australia) Futures Ltd	BUY	336	Ordinary	210	210	N/A
3/18/2020	Merrill Lynch (Australia) Futures Ltd	BUY	471	Ordinary	287	287	N/A
3/23/2020	Merrill Lynch (Australia) Futures Ltd	BUY	812	Ordinary	439	439	N/A
3/18/2020	Merrill Lynch (Australia) Futures Ltd	BUY	439	Ordinary	236	236	N/A
3/18/2020	Merrill Lynch (Australia) Futures Ltd	BUY	49	Ordinary	25	25	N/A
3/23/2020	Merrill Lynch (Australia) Futures Ltd	BUY	616	Ordinary	314	314	N/A
3/18/2020	Merrill Lynch (Australia) Futures Ltd	BUY	765	Ordinary	390	390	N/A
3/18/2020	Merrill Lynch (Australia) Futures Ltd	BUY	515	Ordinary	249	249	N/A
3/23/2020	Merrill Lynch (Australia) Futures Ltd	BUY	588	Ordinary	280	280	N/A
3/18/2020	Merrill Lynch (Australia) Futures Ltd	BUY	618	Ordinary	313	313	N/A
3/18/2020	Merrill Lynch (Australia) Futures Ltd	BUY	862	Ordinary	429	429	N/A

3/23/2020	Merrill Lynch (Australia) Futures Ltd	BUY	169	Ordinary	85	85	N/A
3/18/2020	Merrill Lynch (Australia) Futures Ltd	BUY	581	Ordinary	336	336	N/A
3/18/2020	Merrill Lynch (Australia) Futures Ltd	BUY	510	Ordinary	295	295	N/A
3/23/2020	Merrill Lynch (Australia) Futures Ltd	BUY	400	Ordinary	230	230	N/A
3/18/2020	Merrill Lynch (Australia) Futures Ltd	BUY	5	Ordinary	3	3	N/A
3/18/2020	Merrill Lynch (Australia) Futures Ltd	BUY	25	Ordinary	14	14	N/A
3/23/2020	Merrill Lynch (Australia) Futures Ltd	BUY	171,464	Ordinary	94,211	94,211	N/A
3/18/2020	Merrill Lynch (Australia) Futures Ltd	BUY	408	Ordinary	224	224	N/A
3/18/2020	Merrill Lynch (Australia) Futures Ltd	BUY	44	Ordinary	24	24	N/A
3/23/2020	Merrill Lynch (Australia) Futures Ltd	BUY	794	Ordinary	435	435	N/A
3/18/2020	Merrill Lynch (Australia) Futures Ltd	BUY	572	Ordinary	311	311	N/A
3/18/2020	Merrill Lynch (Australia) Futures Ltd	BUY	696	Ordinary	359	359	N/A
3/23/2020	Merrill Lynch (Australia) Futures Ltd	BUY	774	Ordinary	394	394	N/A
3/18/2020	Merrill Lynch (Australia) Futures Ltd	BUY	808	Ordinary	405	405	N/A
3/18/2020	Merrill Lynch (Australia) Futures Ltd	BUY	928	Ordinary	465	465	N/A
3/23/2020	Merrill Lynch (Australia) Futures Ltd	BUY	849	Ordinary	439	439	N/A
3/18/2020	Merrill Lynch (Australia) Futures Ltd	BUY	896	Ordinary	463	463	N/A
3/18/2020	Merrill Lynch (Australia) Futures Ltd	BUY	413	Ordinary	215	215	N/A
3/23/2020	Merrill Lynch (Australia) Futures Ltd	BUY	811	Ordinary	427	427	N/A
3/18/2020	Merrill Lynch (Australia) Futures Ltd	BUY	248	Ordinary	129	129	N/A
3/18/2020	Merrill Lynch (Australia) Futures Ltd	BUY	62	Ordinary	33	33	N/A
3/23/2020	Merrill Lynch (Australia) Futures Ltd	BUY	1,024	Ordinary	558	558	N/A

3/18/2020	Merrill Lynch (Australia) Futures Ltd	BUY	1,192	Ordinary	646	646	N/A
3/18/2020	Merrill Lynch (Australia) Futures Ltd	BUY	1,352	Ordinary	733	733	N/A
3/23/2020	Merrill Lynch (Australia) Futures Ltd	BUY	1,249	Ordinary	677	677	N/A
3/18/2020	Merrill Lynch (Australia) Futures Ltd	BUY	1,588	Ordinary	854	854	N/A
3/18/2020	Merrill Lynch (Australia) Futures Ltd	BUY	1,408	Ordinary	755	755	N/A
3/23/2020	Merrill Lynch (Australia) Futures Ltd	SELL	(254)	Ordinary	(136)	(136)	N/A
3/18/2020	Merrill Lynch (Australia) Futures Ltd	SELL	(128)	Ordinary	(68)	(68)	N/A
3/18/2020	Merrill Lynch (Australia) Futures Ltd	SELL	(2,164)	Ordinary	(1,189)	(1,189)	N/A
3/23/2020	Merrill Lynch (Australia) Futures Ltd	SELL	(841,883)	Ordinary	(825,375)	(825,375)	N/A
3/18/2020	Merrill Lynch (Australia) Futures Ltd	BUY	430	Ordinary	269	269	N/A

Appendix B-1: Prescribed information

Type of agreement	International Prime Brokerage Agreement
Parties to agreement	Merrill Lynch International, Merrill Lynch International (Australia) Limited and Equity Trustees Limited As Trustee And Responsible Entity Of Regal Investment Fund
Holder of voting rights	Securities borrower. Securities lender may instruct the registered holder to vote on securities.
Are there any restrictions on voting rights?	No
If yes, detail	N/A
Scheduled return date (if any)	On recall of the securities loan by the securities lender.
Does the borrower have the right to return early?	Yes
If yes, detail	Securities borrower will have right to return assets at any time.
Does the lender have the right to recall early?	Yes
If yes, detail	Securities lender will have right to recall assets at any time.
Will the securities be returned on settlement?	Yes
If yes, detail any exceptions	N/A

Appendix B-2: Prescribed information

Type of agreement	International Prime Brokerage Agreement
Parties to agreement	Merrill Lynch International, Merrill Lynch International (Australia) Limited and Regal Funds Management Pty Limited as Trustee of Regal Australian Long Short Equity Fund
Holder of voting rights	Securities borrower. Securities lender may instruct the registered holder to vote on securities.
Are there any restrictions on voting rights?	No
If yes, detail	N/A
Scheduled return date (if any)	On recall of the securities loan by the securities lender.
Does the borrower have the right to return early?	Yes
If yes, detail	Securities borrower will have right to return assets at any time.
Does the lender have the right to recall early?	Yes
If yes, detail	Securities lender will have right to recall assets at any time.
Will the securities be returned on settlement?	Yes
If yes, detail any exceptions	N/A

Appendix B-3: Prescribed information

Type of agreement	International Prime Brokerage Agreement
Parties to agreement	Merrill Lynch International, Merrill Lynch International (Australia) Limited and Regal Funds Management Pty Limited as Trustee of Atlantic Absolute Return Fund
Holder of voting rights	Securities borrower. Securities lender may instruct the registered holder to vote on securities.
Are there any restrictions on voting rights?	No
If yes, detail	N/A
Scheduled return date (if any)	On recall of the securities loan by the securities lender.
Does the borrower have the right to return early?	Yes
If yes, detail	Securities borrower will have right to return assets at any time.
Does the lender have the right to recall early?	Yes
If yes, detail	Securities lender will have right to recall assets at any time.
Will the securities be returned on settlement?	Yes
If yes, detail any exceptions	N/A

Appendix B-4: Prescribed information

Type of agreement	International Prime Brokerage Agreement
Parties to agreement	Merrill Lynch International, Merrill Lynch International (Australia) Limited and SSW-TRADING GMBH
Holder of voting rights	Securities borrower. Securities lender may instruct the registered holder to vote on securities.
Are there any restrictions on voting rights?	No
If yes, detail	N/A
Scheduled return date (if any)	On recall of the securities loan by the securities lender.
Does the borrower have the right to return early?	Yes
If yes, detail	Securities borrower will have right to return assets at any time.
Does the lender have the right to recall early?	Yes
If yes, detail	Securities lender will have right to recall assets at any time.
Will the securities be returned on settlement?	Yes
If yes, detail any exceptions	N/A

Appendix B-5: Prescribed information

Type of agreement	International Prime Brokerage Agreement
Parties to agreement	Merrill Lynch International, Merrill Lynch International (Australia) Limited and Virtu Financial Asia Pty Ltd
Holder of voting rights	Securities borrower. Securities lender may instruct the registered holder to vote on securities.
Are there any restrictions on voting rights?	No
If yes, detail	N/A
Scheduled return date (if any)	On recall of the securities loan by the securities lender.
Does the borrower have the right to return early?	Yes
If yes, detail	Securities borrower will have right to return assets at any time.
Does the lender have the right to recall early?	Yes
If yes, detail	Securities lender will have right to recall assets at any time.
Will the securities be returned on settlement?	Yes
If yes, detail any exceptions	N/A

Appendix C

Related bodies corporate	Incorporated	ACN/Registration/Incorporation Number
Merrill Lynch (Australia) Futures Limited	Australia	003639674
Merrill Lynch International (Australia) Limited	Australia	002892846
Merrill Lynch Markets (Australia) Pty. Limited	Australia	075587816
Merrill Lynch (Australasia) Pty. Limited	Australia	075923894
Bank of America Global Holdings, LLC	United States	5169939
BofAML Jersey Holdings Limited	Jersey	115831
NB Holdings Corporation	United States	2361372
Bank of America Corporation	United States	N/A628