Form 603

Corporations Act 2001 Section 671B

Notice of initial substantial holder

To Company Name/Scheme	Santos Limited
ACN/ARSN	007 550 923
1. Details of substantial holder (1)	
Name	Vanguard Group (The Vanguard Group, Inc. and its controlled entities including those
	listed in Annexure A)
ACN/ARSN (if applicable)	N/A
The holder became a substantial holder on	7 August 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	Person's votes (5)	Voting power (6)
Ordinary	104,173,718	104,173,718	5.001%

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
Vanguard Group	Vanguard Group is the manager of various Mutual funds	Ordinary - 104,173,718
	and accounts and in that capacity has the power to dispose	
	of the shares. The other members of Vanguard Group have	
	a relevant interest under section 608(3) of the Corporations	
	Act.	

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	Registered holder of	Person entitled to be	Class and
interest	securities	registered as holder (8)	number of
			securities
Vanguard Group	Brown Brothers Harriman	Various funds and other accounts of Vanguard Group	Ordinary – 4,745,298
Vanguard Group	BNY Mellon	Various funds and other accounts of Vanguard Group	Ordinary – 4,815,012
Vanguard Group	Citibank	Various funds and other accounts of Vanguard Group	Ordinary – 65,356
Vanguard Group	JP Morgan Chase Bank,	Various funds and other accounts of Vanguard Group	Ordinary –
	N.A.		50,270,321
Vanguard Group	State Street Bank and Trust	Various funds and other accounts of Vanguard Group	Ordinary –
	Company		17,185,522
Vanguard Group	Various others	Various funds and other accounts of Vanguard Group	Ordinary –
			27,092,209

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 A							

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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
N/A	N/A

7. Addresses

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

Name	Address
Vanguard Group	P.O. Box 2600, V26 Valley Forge, PA 19482 USA

print name	Keith Delgado	capacity	Compliance Manager
	0		
	Kenlyn		
sign here		date	12 August 2020

DIRECTIONS

- (1) If there are a number of substantial holders with similar or related interests (eg. a corporation and its related corporations, or the manager and trustee of an equity trust), the names could be included in an annexure to the form. If the relevant interests of a group of persons are essentially similar, they may be referred to throughout the form as a specifically named group if the membership of each group, with the names and addresses of members is clearly set out in paragraph 7 of the form.
- (2) See the definition of "associate" in section 9 of the Corporations Act 2001.
- (3) See the definition of "relevant interest" in sections 608 and 671B(7) of the Corporations Act 2001.
- (4) The voting shares of a company constitute one class unless divided into separate classes.
- (5) The total number of votes attached to all the voting shares in the company or voting interests in the scheme (if any) that the person or an Associate has a relevant interest in.
- (6) The person's votes divided by the total votes in the body corporate or scheme multiplied by 100.
- (7) Include details of:
 - (a) any relevant agreement or other circumstances by which the relevant interest was acquired. If subsection 671B(4) applies, a copy of any document setting out the terms of any relevant agreement, and a statement by the person giving full and accurate details of any contract, scheme or arrangement, must accompany this form, together with a written statement certifying this contract, scheme or arrangement; and
 - (b) any qualification of the power of a person to exercise, control the exercise of, or influence the exercise of, the voting powers or disposal of the securities to which the relevant interest relates (indicating clearly the particular securities to which the qualification applies).

See the definition of "relevant agreement" in section 9 of the Corporations Act 2001.

- (8) If the substantial holder is unable to determine the identity of the person (eg. if the relevant interest arises because of an option) write "unknown".
- (9) Details of the consideration must include any and all benefits, moneys and other, that any person from whom a relevant interest has acquired has, or may, become entitled to receive in relation to that acquisition. Details must be included even if the benefit is conditional on the happening or not of a contingency. Details must be included of any benefit paid on behalf of the substantial holder of its associate in relation to the acquisitions, even if they are not paid directly to the person from whom the relevant interest was acquired.

To Company ACN/ARSN

Santos Limited 007 550 923

Substantial Holder Name ACN/ARSN

Vanguard Group

N/A

Date of change	Person whose relevant interest changed	Nature of Change(6)	Consideration given in relation to change(7)	Class	Number of securities affected	Person's votes
	The Vanguard Group, Inc.	SELL	4.36	Ordinary	(8,416)	(8,416)
•	The Vanguard Group, Inc.	SELL	4.36	Ordinary	(18,936)	(18,936)
	The Vanguard Group, Inc.	SELL	4.36	· ·	(16,832)	(16,832)
	The Vanguard Group, Inc.	BUY	4.39	Ordinary	942	942
•	The Vanguard Group, Inc.	BUY	4.25	Ordinary	3,402	3,402
	The Vanguard Group, Inc.	SELL	4.50	Ordinary	(2,723)	(2,723)
17-Apr-2020	The Vanguard Group, Inc.	BUY	4.34	Ordinary	7,905	7,905
17-Apr-2020	The Vanguard Group, Inc.	BUY	4.34	Ordinary	6,048	6,048
20-Apr-2020	The Vanguard Group, Inc.	BUY	4.10	Ordinary	6,912	6,912
20-Apr-2020	The Vanguard Group, Inc.	BUY	4.10	Ordinary	12,096	12,096
21-Apr-2020	The Vanguard Group, Inc.	SELL	4.00	Ordinary	(7,277)	(7,277)
23-Apr-2020	The Vanguard Group, Inc.	SELL	4.27	Ordinary	(153,198)	(153,198)
23-Apr-2020	The Vanguard Group, Inc.	BUY	4.27	Ordinary	153,198	153,198
23-Apr-2020	The Vanguard Group, Inc.	BUY	4.27	Ordinary	153,198	153,198
•	The Vanguard Group, Inc.	BUY	4.24	Ordinary	7,650	7,650
	The Vanguard Group, Inc.	SELL	4.88	Ordinary	(18,936)	(18,936)
	The Vanguard Group, Inc.	BUY	4.70	Ordinary	36,270	36,270
•	The Vanguard Group, Inc.	SELL	4.51	Ordinary	(6,976)	(6,976)
	The Vanguard Group, Inc.	SELL	4.51	Ordinary	(25,248)	(25,248)
'	The Vanguard Group, Inc.	BUY	4.46	Ordinary	2,920	2,920
	The Vanguard Group, Inc.	BUY	4.85	Ordinary	7,841	7,841
	The Vanguard Group, Inc.	SELL	4.79	Ordinary	(5,913)	(5,913)
'	The Vanguard Group, Inc.	BUY	4.76	Ordinary	6,361	6,361
	The Vanguard Group, Inc.	BUY	4.76	Ordinary	917	917
'	The Vanguard Group, Inc.	SELL	4.86	Ordinary	(12,208)	(12,208)
	The Vanguard Group, Inc. The Vanguard Group, Inc.	BUY SELL	4.85	Ordinary	2,899 (30,333)	2,899 (30,333)
'	The Vanguard Group, Inc.	BUY	4.78	Ordinary Ordinary	8,947	8,947
	The Vanguard Group, Inc.	BUY	4.78	Ordinary	917	917
'	The Vanguard Group, Inc.	BUY	4.72	Ordinary	3,395	3,395
'	The Vanguard Group, Inc.	SELL	4.72	Ordinary	(57,972)	(57,972)
	The Vanguard Group, Inc.	BUY	4.56	Ordinary	5,209	5,209
'	The Vanguard Group, Inc.	BUY	4.60	Ordinary	3,393	3,393
	The Vanguard Group, Inc.	BUY	4.87	Ordinary	17,829	17,829
'	The Vanguard Group, Inc.	SELL	5.00	Ordinary	(5,074)	(5,074)
'	The Vanguard Group, Inc.	BUY	5.29	Ordinary	3,400	3,400
22-May-2020	The Vanguard Group, Inc.	SELL	5.26	Ordinary	(4,663)	(4,663)
22-May-2020	The Vanguard Group, Inc.	BUY	5.08	Ordinary	9,526	9,526
25-May-2020	The Vanguard Group, Inc.	BUY	5.24	Ordinary	60,149	60,149
27-May-2020	The Vanguard Group, Inc.	BUY	5.62	Ordinary	1,382	1,382
28-May-2020	The Vanguard Group, Inc.	BUY	5.42	Ordinary	20,928	20,928
	The Vanguard Group, Inc.	SELL	5.37	Ordinary	(8,982)	(8,982)
29-May-2020	The Vanguard Group, Inc.	BUY	5.36	Ordinary	110,209	110,209
29-May-2020	The Vanguard Group, Inc.	BUY	5.36	Ordinary	19,438	19,438
1-Jun-2020	The Vanguard Group, Inc.	BUY	5.59	Ordinary	8,720	8,720
1-Jun-2020	The Vanguard Group, Inc.	SELL	5.50	Ordinary	(3,908)	(3,908)
1-Jun-2020	The Vanguard Group, Inc.	SELL	5.30	Ordinary	(673)	(673)
2-Jun-2020	The Vanguard Group, Inc.	BUY	5.61	Ordinary	26,160	26,160
	The Vanguard Group, Inc.	BUY	5.52	Ordinary	31,937	31,937
	The Vanguard Group, Inc.	BUY	5.75	· · · · · · · · · · · · · · · · · · ·	917	917
	The Vanguard Group, Inc.	BUY	5.67	Ordinary	8,720	8,720
	The Vanguard Group, Inc.	SELL	5.83		(105,150)	(105,150)
	The Vanguard Group, Inc.	BUY	5.82	Ordinary	10,554	10,554
	The Vanguard Group, Inc.	SELL	5.89	Ordinary	(21,370)	(21,370)
	The Vanguard Group, Inc.	SELL	6.13		(8,982)	(8,982)
	The Vanguard Group, Inc.	SELL	6.08		(189,464)	(189,464)
	The Vanguard Group, Inc.	BUY	6.17		3,405	3,405
	The Vanguard Group, Inc.	SELL	6.17	Ordinary	(7,281)	(7,281)
	The Vanguard Group, Inc.	SELL	5.98	Ordinary	(55,384)	(55,384)
	The Vanguard Group, Inc.	SELL	5.90		(99,663)	(99,663)
11-Jun-2020	The Vanguard Group, Inc.	BUY	5.34	Ordinary	8,720	8,720

Date of change	Person whose relevant interest changed	Nature of Change(6)	Consideration given in relation to change(7)	Class	Number of securities affected	Person's votes
	The Vanguard Group, Inc.	SELL	5.34	Ordinary	(8,548)	(8,548)
	The Vanguard Group, Inc.	SELL	5.34	Ordinary	(21,370)	(21,370)
	The Vanguard Group, Inc.	SELL	5.34	Ordinary	(12,822)	(12,822)
	The Vanguard Group, Inc.	SELL	5.60	Ordinary	(50,027)	(50,027)
	The Vanguard Group, Inc.	SELL	5.43	Ordinary	(12,822)	(12,822)
	The Vanguard Group, Inc.	SELL	5.45	Ordinary	(2,671)	(2,671)
	The Vanguard Group, Inc.	BUY	5.53	Ordinary	26,155	26,155
	The Vanguard Group, Inc.	SELL	5.50	Ordinary	(31,813)	(31,813)
	The Vanguard Group, Inc.	SELL	5.43	Ordinary	(10,479)	(10,479)
	The Vanguard Group, Inc.	SELL	5.51	Ordinary	(135,234)	(135,234)
	The Vanguard Group, Inc.	SELL	5.50	Ordinary	(5,189)	(5,189)
	The Vanguard Group, Inc.	BUY	5.50	Ordinary	2,098	2,098
	The Vanguard Group, Inc.	SELL	5.41	Ordinary	(4,354)	(4,354)
	The Vanguard Group, Inc.	SELL	5.20	Ordinary	(12,762)	(12,762)
	The Vanguard Group, Inc.	SELL	5.20	Ordinary	(14,440)	(14,440)
	The Vanguard Group, Inc.	SELL	5.20	Ordinary	(4,332)	(4,332)
	The Vanguard Group, Inc.	SELL	5.20	Ordinary	(7,183)	(7,183)
	The Vanguard Group, Inc.	BUY	5.36	Ordinary	913	913
	The Vanguard Group, Inc.	SELL	5.16	Ordinary	(120,440)	(120,440)
	The Vanguard Group, Inc.	BUY	5.05	Ordinary	9,312	9,312
	The Vanguard Group, Inc.	BUY	5.05	Ordinary	1,826	1,826
	The Vanguard Group, Inc.	SELL	5.39	Ordinary	(10,635)	(10,635)
	The Vanguard Group, Inc.	BUY	5.30	Ordinary	42,433	42,433
	The Vanguard Group, Inc.	BUY	5.28	Ordinary	914	914
	The Vanguard Group, Inc.	BUY	5.36	Ordinary	1,008	1,008
	The Vanguard Group, Inc.	BUY	5.27	Ordinary	6,530	6,530
	The Vanguard Group, Inc.	BUY	5.25	Ordinary	2,016	2,016
	The Vanguard Group, Inc.	SELL	5.22	Ordinary	(108,576)	(108,576)
	The Vanguard Group, Inc.	BUY	5.16	Ordinary	931	931
	The Vanguard Group, Inc.	BUY	5.08	Ordinary	1,008	1,008
	The Vanguard Group, Inc.	SELL	5.13	Ordinary	(111,434)	(111,434)
	The Vanguard Group, Inc.	BUY	5.19	Ordinary	930	930
	The Vanguard Group, Inc.	SELL	5.20	Ordinary	(88,065)	(88,065)
	The Vanguard Group, Inc.	SELL	5.20	Ordinary	(18,184)	(18,184)
	The Vanguard Group, Inc.	SELL	5.38	Ordinary	(20,928)	(20,928)
	The Vanguard Group, Inc.	SELL	5.38	Ordinary	(6,976)	(6,976)
	The Vanguard Group, Inc.	SELL	5.44	Ordinary	(2,208)	(2,208)
	The Vanguard Group, Inc.	BUY	5.16	Ordinary	19,326	19,326
	The Vanguard Group, Inc.	BUY	5.42	Ordinary	26,393	26,393
	The Vanguard Group, Inc.	BUY	5.43	Ordinary	1,878	1,878
	The Vanguard Group, Inc.	BUY	5.43	Ordinary	629	629
31-Jul-2020	The Vanguard Group, Inc.	BUY	5.28	Ordinary	52,374	52,374
	The Vanguard Group, Inc.	BUY	5.27	Ordinary	3,271	3,271
	The Vanguard Group, Inc.	BUY	5.27	Ordinary	928	928
	The Vanguard Group, Inc.	BUY	5.27	Ordinary	1,887	1,887
3-Aug-2020	The Vanguard Group, Inc.	SELL	5.25	-	(140,000)	(140,000)
•	The Vanguard Group, Inc.	SELL	5.22	Ordinary	(125,399)	(125,399)
	The Vanguard Group, Inc.	BUY	5.31	Ordinary	10,176	10,176
	The Vanguard Group, Inc.	BUY	5.56	Ordinary	937	937
9-Apr-2020	Vanguard Investments Australia Ltd.	BUY	4.54	Ordinary	23,130	23,130
9-Apr-2020	Vanguard Investments Australia Ltd.	SELL	4.61	Ordinary	(99,729)	(99,729)
	Vanguard Investments Australia Ltd.	BUY	4.61	Ordinary	55,828	55,828
· · · · · · · · · · · · · · · · · · ·	Vanguard Investments Australia Ltd.	SELL	4.56	Ordinary	(93,604)	(93,604)
	Vanguard Investments Australia Ltd.	BUY	4.39	Ordinary	32,960	32,960
17-Apr-2020	Vanguard Investments Australia Ltd.	SELL	4.35	Ordinary	(3,320)	(3,320)
	Vanguard Investments Australia Ltd.	BUY	4.08	Ordinary	5,251	5,251
•	Vanguard Investments Australia Ltd.	BUY	4.01	Ordinary	27,948	27,948
	Vanguard Investments Australia Ltd.	BUY	4.01	Ordinary	32,880	32,880
•	Vanguard Investments Australia Ltd.	SELL	3.99	Ordinary	(191,115)	(191,115)
· · · · · · · · · · · · · · · · · · ·	Vanguard Investments Australia Ltd.	SELL	4.26	Ordinary	(203,461)	(203,461)
	Vanguard Investments Australia Ltd.	BUY	4.26	Ordinary	24,555	24,555
· · · · · · · · · · · · · · · · · · ·	Vanguard Investments Australia Ltd.	BUY	4.25	Ordinary	29,412	29,412
•	Vanguard Investments Australia Ltd.	SELL	4.94	Ordinary	(41,347)	(41,347)
•	Vanguard Investments Australia Ltd.	SELL	4.94	Ordinary	(22,124)	(22,124)
	Vanguard Investments Australia Ltd.	SELL	4.56	-	(18,032)	(18,032)
	Vanguard Investments Australia Ltd.	SELL	4.56	Ordinary	(6,984)	(6,984)
		1	50	~ ,	(-,-5.)	(-,-3.)
· · · · · · · · · · · · · · · · · · ·	Vanguard Investments Australia Ltd.	BUY	4.56	Ordinary	32,680	32,680

Date of change	Person whose relevant interest changed	Nature of Change(6)	Consideration given in relation to change(7)	Class	Number of securities affected	Person's votes affected
4-May-2020	Vanguard Investments Australia Ltd.	BUY	4.60	Ordinary	45,724	45,724
5-May-2020	Vanguard Investments Australia Ltd.	SELL	4.83	Ordinary	(4,541)	(4,541)
5-May-2020	Vanguard Investments Australia Ltd.	SELL	4.83	Ordinary	(22,162)	(22,162)
8-May-2020	Vanguard Investments Australia Ltd.	BUY	4.85	Ordinary	1,628	1,628
12-May-2020	Vanguard Investments Australia Ltd.	BUY	4.78	Ordinary	22,764	22,764
13-May-2020	Vanguard Investments Australia Ltd.	BUY	4.72	Ordinary	24,390	24,390
19-May-2020	Vanguard Investments Australia Ltd.	BUY	5.10	Ordinary	32,500	32,500
20-May-2020	Vanguard Investments Australia Ltd.	BUY	5.12	Ordinary	26,016	26,016
22-May-2020	Vanguard Investments Australia Ltd.	BUY	5.08	Ordinary	19,500	19,500
25-May-2020	Vanguard Investments Australia Ltd.	BUY	5.25	Ordinary	16,250	16,250
26-May-2020	Vanguard Investments Australia Ltd.	BUY	5.46	Ordinary	199,016	199,016
26-May-2020	Vanguard Investments Australia Ltd.	BUY	5.46	Ordinary	24,375	24,375
27-May-2020	Vanguard Investments Australia Ltd.	SELL	5.62	Ordinary	(19,000)	(19,000
	Vanguard Investments Australia Ltd.	BUY	5.62	Ordinary	193,799	193,799
	Vanguard Investments Australia Ltd.	SELL	5.44	Ordinary	(1,565)	(1,565)
	Vanguard Investments Australia Ltd.	SELL	5.44	Ordinary	(92,891)	(92,891
	Vanguard Investments Australia Ltd.	BUY	5.36	Ordinary	24,315	24,315
•	Vanguard Investments Australia Ltd.	SELL	5.52	Ordinary	(27,966)	(27,966)
	Vanguard Investments Australia Ltd.	SELL	5.66	Ordinary	(55,162)	(55,162)
	Vanguard Investments Australia Ltd.	SELL	5.75	Ordinary	(31,802)	(31,802)
	Vanguard Investments Australia Ltd.	BUY	5.75	Ordinary	24,360	24,360
	Vanguard Investments Australia Ltd.	BUY	5.75	Ordinary	19,488	19,488
	Vanguard Investments Australia Ltd.	SELL	5.98	Ordinary	(35,745)	(35,745)
	Vanguard Investments Australia Ltd.	SELL	5.60	Ordinary	(2,840)	(2,840)
	Vanguard Investments Australia Ltd.	BUY	5.60	Ordinary	24,360	24,360
	Vanguard Investments Australia Ltd.	BUY	5.19	Ordinary	32,580	32,580
	Vanguard Investments Australia Ltd.	BUY	5.45	Ordinary	16,300	16,300
	Vanguard Investments Australia Ltd.	BUY	5.53	Ordinary	24,450	24,450
	Vanguard Investments Australia Ltd. Vanguard Investments Australia Ltd.	SELL	5.51	Ordinary	(29,415)	(29,415)
	Vanguard Investments Australia Ltd. Vanguard Investments Australia Ltd.	BUY	5.50	Ordinary	3,264	3.264
	Vanguard Investments Australia Ltd.	SELL	5.45	Ordinary	(27,659)	(27,659)
	Vanguard Investments Australia Ltd. Vanguard Investments Australia Ltd.	BUY	5.18	Ordinary	37,421	37,421
	-	SELL	5.21		(69,013)	(69,013)
	Vanguard Investments Australia Ltd. Vanguard Investments Australia Ltd.	BUY	5.21	Ordinary Ordinary	89,822	89,822
	-	BUY	5.21		10,891	10,891
	Vanguard Investments Australia Ltd. Vanguard Investments Australia Ltd.	BUY	5.21	Ordinary Ordinary	16,138	16,138
	-	SELL				
	Vanguard Investments Australia Ltd.		5.21	Ordinary	(6,371)	(6,371)
	Vanguard Investments Australia Ltd.	SELL	5.21	Ordinary	(19,305)	(19,305)
	Vanguard Investments Australia Ltd.	SELL	5.21	Ordinary	(19,305)	(19,305)
	Vanguard Investments Australia Ltd.	SELL	5.31	Ordinary	(10,634)	(10,634)
	Vanguard Investments Australia Ltd.	SELL	5.08	Ordinary	(1,188,597)	(1,188,597)
	Vanguard Investments Australia Ltd.	SELL	5.26	Ordinary	(14,598)	(14,598)
	Vanguard Investments Australia Ltd.	SELL	5.58	Ordinary	(68,441)	(68,441)
	Vanguard Investments Australia Ltd.	BUY	5.43	Ordinary	21,138	21,138
	Vanguard Investments Australia Ltd.	BUY	5.27	Ordinary	66,396	66,396
	Vanguard Investments Australia Ltd.	BUY	5.53	Ordinary	24,420	24,420
7-Aug-2020	Vanguard Investments Australia Ltd.	BUY	5.70	Ordinary	32,600	32,600

This is Annexure A of 3 pages referred to in Form 603, Notice of initial substantial holder.

Signature:	
Name: Keith Delgado	
Capacity: Compliance Manager	
Date: 12 August 2020	