

14 December 2021

Market Announcements Office
ASX Limited
Exchange Centre
20 Bridge Street
SYDNEY NSW 2000

Notice of Initial Substantial Holder

Attached is a Form 603 Notice of Initial Substantial Holder in relation to Damstra Holdings Limited completed by Australian Ethical Investment Limited.

Yours faithfully,

Authorised by Tom May
Company Secretary

Form 603

Corporations Act 2001
Section 671B

Notice of initial substantial holder

To Company Name/Scheme Damstra Holdings Limited

ACN/ARSN 610 571 607

1. Details of substantial holder (1)

Name National Nominees Ltd ACF Australian Ethical Investment Limited

ABN 51 004 278 899

The holder became substantial on 10/12/2021

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 th substantial holder became a substantial holder are as follows:

Class of securities (4)	Number of securities	Person's votes (5)	Voting power (6)
Ordinary F/P	15,041,364	15,041,364	6.29%

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
National Nominees Ltd ACF Australian Ethical Investment		15,041,364 Ordinary F/P

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
National Nominees Ltd ACF Australian Ethical Investment	National Nominees Ltd ACF Australian Ethical Investment	National Nominees Ltd ACF Australian Ethical Investment	15,041,364 Ordinary F/P

5. Consideration

The consideration paid for each relevant interest referred to 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 refer to spreadsheet				

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

7. Addresses

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

Name	Address
National Nominees Ltd	Level 12, 500 Bourke St, MELBOURNE VIC 3000
Australian Ethical Investment Limited	GPO Box Centre Sydney, GPO Box 8, Sydney NSW 2001

Signature

Print name: Robert Bush

Capacity: Senior Fund Accounting Manager

Sign here:

Date: 14/12/2021

DIRECTIONS

- (1) If there are a number of substantial holders with similar or related relevant interests (e.g. 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, with the names and addresses 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 (e.g. If the relevant interest arises because of an option) write "unknown".
- (9) Details of the consideration must include any and all benefits, money and other, that any person from whom a relevant interest was 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 or its associate in relation to the acquisitions, even if they are not paid directly to the person from whom the relevant interest was acquired.

DTC	Damstra Holdings Ltd.					
National Nominees Ltd ACF Australian Ethical Investment Ltd		% This Report	% Previous Report	% Movement	AEI Holding	Issued Shares
Holds		6.29	0.00	6.29	15,041,364	239,280,728

Notice Required: Form 603 - Notice of becoming of substantial holder

Date of Change	Person whose relevant interest changed	Nature of Change	Consideration given in relation to change	Class and number of securities affected	Person whose votes affected
18/09/2019	National Nominees Ltd ACF	Buy	- 1,200,000.60	1,333,334	National Nominees Ltd ACF
31/10/2019	ditto	Buy	- 50,234.36	45,742	ditto
04/11/2019	ditto	Buy	- 48,932.42	45,000	ditto
05/11/2019	ditto	Buy	- 27,059.40	25,000	ditto
08/11/2019	ditto	Buy	- 108,057.39	99,852	ditto
11/11/2019	ditto	Buy	- 108,327.54	100,148	ditto
12/11/2019	ditto	Buy	- 104,862.26	101,624	ditto
13/11/2019	ditto	Buy	- 7,435.10	7,376	ditto
05/12/2019	ditto	Buy	- 219,880.88	200,000	ditto
10/12/2019	ditto	Buy	- 215,119.02	202,268	ditto
17/12/2019	ditto	Buy	- 41,634.56	42,828	ditto
07/01/2020	ditto	Buy	- 47,370.46	47,504	ditto
09/01/2020	ditto	Buy	- 52,348.44	52,496	ditto
13/01/2020	ditto	Buy	- 45,593.65	46,422	ditto
14/01/2020	ditto	Buy	- 101,729.75	103,578	ditto
28/01/2020	ditto	Buy	- 65,643.94	68,229	ditto
20/07/2020	ditto	Sell	193,281.73	121,721	ditto
21/07/2020	ditto	Sell	444,416.24	278,279	ditto
22/07/2020	ditto	Sell	483,183.37	260,584	ditto
27/07/2020	ditto	Sell	19,120.15	10,358	ditto
27/07/2020	ditto	Sell	139,548.71	77,427	ditto
28/07/2020	ditto	Sell	10,097.19	5,573	ditto
06/08/2020	ditto	Sell	184,656.86	110,000	ditto
07/08/2020	ditto	Sell	141,849.75	85,000	ditto
10/08/2020	ditto	Sell	169,849.35	101,772	ditto
11/08/2020	ditto	Sell	53,514.01	32,000	ditto
12/08/2020	ditto	Sell	17,151.48	10,355	ditto
13/08/2020	ditto	Sell	46,148.33	27,645	ditto
24/08/2020	ditto	Sell	370,904.33	187,278	ditto
26/08/2020	ditto	Sell	115,709.75	59,311	ditto
27/08/2020	ditto	Sell	909,573.57	496,638	ditto
28/08/2020	ditto	Sell	553,581.29	312,494	ditto
31/08/2020	ditto	Sell	372,582.01	211,632	ditto
01/09/2020	ditto	Sell	234,510.77	133,334	ditto
15/12/2020	ditto	Buy	- 114,324.28	85,397	ditto

Annexure A

DTC Damstra Holdings Ltd.

National Nominees Ltd ACF Australian Ethical Investment Ltd

Holds

% This Report

6.29

% Previous Report

0.00

% Movement

6.29

AEI Holding

15,041,364

Issued Shares

239,280,728

Notice Required: Form 603 - Notice of becoming of substantial holder

Date of Change	Person whose relevant interest changed	Nature of Change	Consideration given in relation to change	Class and number of securities affected	Person whose votes affected	
17/12/2020	ditto	Buy	-	848,210.63	624,796	ditto
21/12/2020	ditto	Buy	-	347,424.49	260,648	ditto
28/01/2021	ditto	Buy	-	1,292,462.48	955,278	ditto
05/02/2021	ditto	Buy	-	493,882.12	365,550	ditto
08/02/2021	ditto	Buy	-	181,435.21	134,450	ditto
25/02/2021	ditto	Buy	-	101,195.82	76,501	ditto
12/03/2021	ditto	Buy	-	32,099.90	33,198	ditto
23/04/2021	ditto	Buy	-	304,095.33	276,020	ditto
30/04/2021	ditto	Buy	-	217,358.05	200,000	ditto
04/05/2021	ditto	Buy	-	95,876.16	93,869	ditto
05/05/2021	ditto	Buy	-	183,924.41	179,616	ditto
06/05/2021	ditto	Buy	-	228,771.92	226,515	ditto
07/05/2021	ditto	Buy	-	89,367.65	92,466	ditto
10/05/2021	ditto	Buy	-	102,508.97	107,534	ditto
11/05/2021	ditto	Buy	-	90,719.44	100,000	ditto
13/05/2021	ditto	Buy	-	135,222.75	150,000	ditto
14/05/2021	ditto	Buy	-	133,269.53	150,000	ditto
18/05/2021	ditto	Buy	-	212,850.63	250,000	ditto
19/05/2021	ditto	Buy	-	125,083.03	152,289	ditto
26/05/2021	ditto	Buy	-	20,659.91	23,388	ditto
02/06/2021	ditto	Buy	-	841,535.07	952,010	ditto
07/06/2021	ditto	Buy	-	8,764.44	10,000	ditto
08/06/2021	ditto	Buy	-	3,312.33	3,654	ditto
09/06/2021	ditto	Buy	-	151,553.66	167,780	ditto
16/06/2021	ditto	Buy	-	55,094.20	60,784	ditto
17/06/2021	ditto	Buy	-	171,504.07	189,216	ditto
23/06/2021	ditto	Buy	-	76,951.10	86,368	ditto
24/06/2021	ditto	Buy	-	5,425.47	6,086	ditto
25/06/2021	ditto	Buy	-	139,910.75	157,546	ditto
07/07/2021	ditto	Buy	-	1,045,692.19	1,269,264	ditto
12/07/2021	ditto	Buy	-	8,113.37	10,000	ditto
13/07/2021	ditto	Buy	-	156,853.88	188,783	ditto
14/07/2021	ditto	Buy	-	163,048.59	200,000	ditto
15/07/2021	ditto	Buy	-	160,243.97	200,000	ditto
27/08/2021	ditto	Buy	-	159,890.38	159,627	ditto

Annexure A

DTC	Damstra Holdings Ltd.					
National Nominees Ltd	ACF Australian Ethical Investment Ltd	% This Report	% Previous Report	% Movement	AEI Holding	Issued Shares
	Holds	6.29	0.00	6.29	15,041,364	239,280,728

Notice Required: Form 603 - Notice of becoming of substantial holder

Date of Change	Person whose relevant interest changed	Nature of Change	Consideration given in relation to change	Class and number of securities affected	Person whose votes affected
30/08/2021	ditto	Buy	- 338,820.82	340,373	ditto
31/08/2021	ditto	Buy	- 342,004.51	368,210	ditto
01/09/2021	ditto	Buy	- 73,620.33	79,287	ditto
03/09/2021	ditto	Buy	- 5,497.26	6,031	ditto
07/09/2021	ditto	Buy	- 230,267.05	255,289	ditto
08/09/2021	ditto	Buy	- 9,310.98	10,215	ditto
06/12/2021	ditto	Buy	- 1,966,330.84	5,783,326	ditto