
Form 604

Corporations Law
Section 671B

Notice of change of interests of substantial holder

To: Company Name/Scheme **OPTHEA LTD**

ACN/ARSN **006 340 567**

1. Details of substantial holder

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

ACN/ARSN (if applicable): _____

There was a change in the interests of the substantial holder on **4 October 2019**

The previous notice was given to the company on **8 October 2019**

2. Previous and present 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 when last required, and when now required, to give a substantial holding notice to the company or scheme, are as follows:

Class of securities (4)	Previous Notice		Present Notice	
	Person's Votes	Voting Power (5)	Person's Votes	Voting Power (5)
Ordinary	13,153,306	5.26%	15,793,378	6.31%

3. Changes in relevant interests

Particulars of each change in, or change in the nature of, a relevant interest of the substantial holder or an associate in voting securities of the company or scheme, since the substantial holder was last required to give a substantial holding notice to the company or scheme are as follows:

Date of change	Person whose relevant interest changed	Nature of Change (6)	Consideration given in relation to change (7)	Class and Number of securities affected	Person's votes affected
Please see Appendix A					

4. Present relevant interests

Particulars of each relevant interest of the substantial holder in voting securities after the change are as follows:

Holder of relevant interest	Registered holder of securities	Person entitled to be registered holder (8)	Nature of relevant interest (6)	Class and number of securities	Person's votes
Merrill Lynch (Australia) Futures Ltd	Merrill Lynch (Australia) Nominees Pty Ltd	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 11,615,753	11,615,753
Merrill Lynch International (Australia) Ltd	Merrill Lynch (Australia) Nominees Pty Ltd	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 3,793,565	3,793,565
Merrill Lynch International	Merrill Lynch (Australia) Nominees Pty Ltd	Merrill Lynch International	Power to control voting and/or disposal of securities in its capacity as ultimate beneficial owner having a principal position.	Ordinary 5,496	5,496
Merrill Lynch International	Merrill Lynch (Australia) Nominees Pty Ltd	Merrill Lynch International	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 378,564	378,564

5. Changes in association

The persons who have become associates (2) of, ceased to be associates of, or have changed the nature of their association (9) with, the substantial holder in relation to voting interests in the company or scheme are as follows:

Name and ACN/ ARSN (if applicable)	Nature of association
N/A	N/A

6. 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
Merrill Lynch International	2 King Edward Street, London, England, EC1A 1HQ, United Kingdom.

SIGNATURE

Print Name: Kelvin Kwok

Capacity: Authorised signatory

Sign Here:



Date: 9 October 2019

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
10/4/2019	Merrill Lynch International (Australia) Limited	Securities borrowed	N/A	Ordinary	2,415,094	2,415,094	Refer to App. B
10/4/2019	Merrill Lynch (Australia) Futures Ltd	BUY	1,924	Ordinary	571	571	N/A
10/4/2019	Merrill Lynch (Australia) Futures Ltd	BUY	739,919	Ordinary	218,911	218,911	N/A
10/4/2019	Merrill Lynch International	BUY	312	Ordinary	93	93	N/A
10/4/2019	Merrill Lynch International	BUY	91	Ordinary	27	27	N/A
10/4/2019	Merrill Lynch International	BUY	293	Ordinary	87	87	N/A
10/4/2019	Merrill Lynch International	BUY	136	Ordinary	40	40	N/A
10/4/2019	Merrill Lynch International	BUY	101	Ordinary	30	30	N/A
10/4/2019	Merrill Lynch International	BUY	94	Ordinary	28	28	N/A
10/4/2019	Merrill Lynch International	BUY	74	Ordinary	22	22	N/A
10/4/2019	Merrill Lynch International	BUY	111	Ordinary	33	33	N/A
10/4/2019	Merrill Lynch International	BUY	97	Ordinary	29	29	N/A
10/4/2019	Merrill Lynch International	BUY	114	Ordinary	34	34	N/A
10/4/2019	Merrill Lynch International	BUY	108	Ordinary	32	32	N/A
10/4/2019	Merrill Lynch International	BUY	30	Ordinary	9	9	N/A
10/4/2019	Merrill Lynch International	BUY	20	Ordinary	6	6	N/A
10/4/2019	Merrill Lynch International	BUY	95	Ordinary	28	28	N/A
10/4/2019	Merrill Lynch International	BUY	649	Ordinary	192	192	N/A
10/4/2019	Merrill Lynch International	BUY	68	Ordinary	20	20	N/A
10/4/2019	Merrill Lynch International	BUY	82	Ordinary	24	24	N/A
10/4/2019	Merrill Lynch International	BUY	7	Ordinary	2	2	N/A
10/4/2019	Merrill Lynch International	BUY	195	Ordinary	57	57	N/A
10/4/2019	Merrill Lynch International	BUY	99	Ordinary	29	29	N/A
10/4/2019	Merrill Lynch International	BUY	86	Ordinary	25	25	N/A
10/4/2019	Merrill Lynch International	BUY	75	Ordinary	22	22	N/A
10/4/2019	Merrill Lynch International	BUY	393	Ordinary	116	116	N/A
10/4/2019	Merrill Lynch International	BUY	398	Ordinary	118	118	N/A
10/4/2019	Merrill Lynch International	BUY	151	Ordinary	45	45	N/A
10/4/2019	Merrill Lynch International	BUY	97	Ordinary	29	29	N/A
10/4/2019	Merrill Lynch International	BUY	179	Ordinary	53	53	N/A
10/4/2019	Merrill Lynch International	BUY	225	Ordinary	67	67	N/A
10/4/2019	Merrill Lynch International	BUY	256	Ordinary	76	76	N/A

10/4/2019	Merrill Lynch International	BUY	256	Ordinary	76	76	N/A
10/4/2019	Merrill Lynch International	BUY	255	Ordinary	76	76	N/A
10/4/2019	Merrill Lynch International	BUY	20	Ordinary	6	6	N/A
10/4/2019	Merrill Lynch International	BUY	69	Ordinary	20	20	N/A
10/4/2019	Merrill Lynch International	BUY	79	Ordinary	23	23	N/A
10/4/2019	Merrill Lynch International	BUY	345	Ordinary	101	101	N/A
10/4/2019	Merrill Lynch International	BUY	360	Ordinary	106	106	N/A
10/4/2019	Merrill Lynch International	BUY	108	Ordinary	32	32	N/A
10/4/2019	Merrill Lynch International	BUY	141	Ordinary	42	42	N/A
10/4/2019	Merrill Lynch International	BUY	326	Ordinary	95	95	N/A
10/4/2019	Merrill Lynch International	BUY	196	Ordinary	58	58	N/A
10/4/2019	Merrill Lynch International	BUY	273	Ordinary	80	80	N/A
10/4/2019	Merrill Lynch International	BUY	27	Ordinary	8	8	N/A
10/4/2019	Merrill Lynch International	BUY	145	Ordinary	43	43	N/A
10/4/2019	Merrill Lynch International	BUY	176	Ordinary	52	52	N/A
10/4/2019	Merrill Lynch International	BUY	54	Ordinary	16	16	N/A
10/4/2019	Merrill Lynch International	BUY	312	Ordinary	92	92	N/A
10/4/2019	Merrill Lynch International	BUY	356	Ordinary	105	105	N/A
10/4/2019	Merrill Lynch International	BUY	143	Ordinary	42	42	N/A
10/4/2019	Merrill Lynch International	BUY	226	Ordinary	66	66	N/A
10/4/2019	Merrill Lynch International	BUY	261	Ordinary	77	77	N/A
10/4/2019	Merrill Lynch International	BUY	389	Ordinary	115	115	N/A
10/4/2019	Merrill Lynch International	BUY	34	Ordinary	10	10	N/A
10/4/2019	Merrill Lynch International	BUY	603	Ordinary	179	179	N/A
10/4/2019	Merrill Lynch International	BUY	51	Ordinary	15	15	N/A
10/4/2019	Merrill Lynch International	BUY	101	Ordinary	30	30	N/A
10/4/2019	Merrill Lynch International	BUY	30	Ordinary	9	9	N/A
10/4/2019	Merrill Lynch International	BUY	47	Ordinary	14	14	N/A
10/4/2019	Merrill Lynch International	BUY	112	Ordinary	33	33	N/A
10/4/2019	Merrill Lynch International	BUY	92	Ordinary	27	27	N/A
10/4/2019	Merrill Lynch International	BUY	128	Ordinary	38	38	N/A
10/4/2019	Merrill Lynch International	BUY	51	Ordinary	15	15	N/A
10/4/2019	Merrill Lynch International	BUY	88	Ordinary	26	26	N/A
10/4/2019	Merrill Lynch International	BUY	64	Ordinary	19	19	N/A
10/4/2019	Merrill Lynch International	BUY	265	Ordinary	79	79	N/A
10/4/2019	Merrill Lynch International	BUY	37	Ordinary	11	11	N/A
10/4/2019	Merrill Lynch International	BUY	17	Ordinary	5	5	N/A

10/4/2019	Merrill Lynch International	BUY	218	Ordinary	65	65	N/A
10/4/2019	Merrill Lynch International	BUY	135	Ordinary	40	40	N/A
10/4/2019	Merrill Lynch International	BUY	40	Ordinary	12	12	N/A
10/4/2019	Merrill Lynch International	BUY	57	Ordinary	17	17	N/A
10/4/2019	Merrill Lynch International	BUY	138	Ordinary	41	41	N/A
10/4/2019	Merrill Lynch International	BUY	149	Ordinary	44	44	N/A
10/4/2019	Merrill Lynch International	BUY	108	Ordinary	32	32	N/A
10/4/2019	Merrill Lynch International	BUY	112	Ordinary	33	33	N/A
10/4/2019	Merrill Lynch International	BUY	242	Ordinary	72	72	N/A
10/4/2019	Merrill Lynch International	BUY	71	Ordinary	21	21	N/A
10/4/2019	Merrill Lynch International	BUY	128	Ordinary	38	38	N/A
10/4/2019	Merrill Lynch International	BUY	47	Ordinary	14	14	N/A
10/4/2019	Merrill Lynch International	BUY	94	Ordinary	28	28	N/A
10/4/2019	Merrill Lynch International	BUY	101	Ordinary	30	30	N/A
10/4/2019	Merrill Lynch International	BUY	110	Ordinary	32	32	N/A
10/4/2019	Merrill Lynch International	BUY	27	Ordinary	8	8	N/A
10/4/2019	Merrill Lynch International	BUY	390	Ordinary	116	116	N/A
10/4/2019	Merrill Lynch International	BUY	235	Ordinary	69	69	N/A
10/4/2019	Merrill Lynch International	BUY	191	Ordinary	56	56	N/A
10/4/2019	Merrill Lynch International	BUY	368	Ordinary	108	108	N/A
10/4/2019	Merrill Lynch International	BUY	17	Ordinary	5	5	N/A
10/4/2019	Merrill Lynch International	BUY	449	Ordinary	132	132	N/A
10/4/2019	Merrill Lynch International	BUY	106	Ordinary	31	31	N/A
10/4/2019	Merrill Lynch International	BUY	297	Ordinary	87	87	N/A
10/4/2019	Merrill Lynch International	BUY	51	Ordinary	15	15	N/A
10/4/2019	Merrill Lynch International	BUY	24	Ordinary	7	7	N/A
10/4/2019	Merrill Lynch International	BUY	147	Ordinary	43	43	N/A
10/4/2019	Merrill Lynch International	BUY	405	Ordinary	119	119	N/A
10/4/2019	Merrill Lynch International	BUY	24	Ordinary	7	7	N/A
10/4/2019	Merrill Lynch International	BUY	14	Ordinary	4	4	N/A
10/4/2019	Merrill Lynch International	BUY	27	Ordinary	8	8	N/A
10/4/2019	Merrill Lynch International	BUY	10	Ordinary	3	3	N/A
10/4/2019	Merrill Lynch International	BUY	525	Ordinary	154	154	N/A
10/4/2019	Merrill Lynch International	BUY	248	Ordinary	73	73	N/A
10/4/2019	Merrill Lynch International	BUY	109	Ordinary	32	32	N/A
10/4/2019	Merrill Lynch International	BUY	357	Ordinary	105	105	N/A
10/4/2019	Merrill Lynch International	BUY	10	Ordinary	3	3	N/A

10/4/2019	Merrill Lynch International	BUY	170	Ordinary	50	50	N/A
10/4/2019	Merrill Lynch International	BUY	20	Ordinary	6	6	N/A
10/4/2019	Merrill Lynch International	BUY	41	Ordinary	12	12	N/A
10/4/2019	Merrill Lynch International	BUY	330	Ordinary	97	97	N/A
10/4/2019	Merrill Lynch International	BUY	493	Ordinary	146	146	N/A
10/4/2019	Merrill Lynch International	BUY	169	Ordinary	50	50	N/A
10/4/2019	Merrill Lynch International	BUY	206	Ordinary	61	61	N/A
10/4/2019	Merrill Lynch International	BUY	389	Ordinary	115	115	N/A
10/4/2019	Merrill Lynch International	BUY	139	Ordinary	41	41	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 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-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 Tasman Market Neutral 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 and SSWTRADING
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 and Integrated Core Strategies (Asia)
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-6: Prescribed information

Type of agreement	International Prime Brokerage Agreement
Parties to agreement	Merrill Lynch International 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 C

Related bodies corporate	Incorporated	ACN/Registration/Incorporation Number
Merrill Lynch International	United Kingdom	2312079
ML UK Capital Holdings	United Kingdom	4971231
BofAML EMEA Holdings 2 Limited	United States	119605
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