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Acumentis Group Limited ("ACU") – Delayed Lodgement of Change of Director's Interest Notice ("Appendix 3Y") – Timothy Rabbitt

On 18 July 2025, 1,000,000 "Tranche 2" performance rights, originally issued on 25 October 2023 under an employee incentive scheme, were exercised by Timothy Rabbitt following satisfaction of the relevant service condition.

While details of the exercised performance rights were disclosed in an Application for Quotation of Securities lodged on the ASX Market Announcements Platform on 21 July 2025, an Appendix 3Y was not lodged at that time.

On 18 July 2025, 405,000 performance rights issued to Timothy Rabbitt on 1 November 2022 lapsed due to because the conditions relating to their vesting had not been, or could no longer be capable of being, satisfied.

Whilst details of the lapsing of the rights was detailed in the Notification of Cessation of Securities announced on 23 July 2025, no Appendix 3Y was lodged within the required time frame.

The Change of Director's Interest Notice recording the exercise of performance rights on 18 July 2025 and the reduction in number of performance rights held by Timothy Rabbitt due to the lapsing of rights on 23 July 2025 was lodged on 28 July 2025 but was due by 25 July 2025.

The delayed lodgement of the Appendix 3Y was due to human error. John Wise has resigned as CFO effective 11 July 2025 and is now employed on a casual basis only (but remains as Company Secretary). John Wise is providing ongoing training to replacement staff and unfortunately this resulted in missing the deadline for lodgement of the Appendix 3Y.

Acumentis will continue to focus on ensuring that relevant staff are aware of, and adhere to, the ASX Listing Rules and will ensure that checklists are created and utilised to address requirements whenever security changes occur that trigger announcements.

John Wise
Company Secretary
ACUMENTIS



30 July 2025

Reference: 111254

Mr John Wise
Company Secretary
Acumentis Group Limited
Level 4, 35 Boundary St
South Brisbane QLD 4101

By email

Dear Mr Wise

Acumentis Group Limited ('ACU'): Appendix 3Y – Change of Director's Interest Notice Query

ASX refers to the following:

1. ACU's Appendix 3Y lodged on the ASX Market Announcements Platform ('MAP') on 28 July 2025 for Mr Timothy Rabbitt (the 'Notice');
2. Listing Rule 3.19A which requires an entity to tell ASX the following:

3.19A.1 *'The notifiable interests of a director of the entity (or in the case of a trust, a director of the responsible entity of the trust) at the following times.*

- *On the date that the entity is admitted to the official list.*
- *On the date that a director is appointed.*

The entity must complete Appendix 3X and give it to ASX no more than 5 business days after the entity's admission or a director's appointment.

3.19A.2 *A change to a notifiable interest of a director of the entity (or in the case of a trust, a director of the responsible entity of the trust) including whether the change occurred during a closed period where prior written clearance was required and, if so, whether prior written clearance was provided. The entity must complete Appendix 3Y and give it to ASX no more than 5 business days after the change occurs.*

3.19A.3 *The notifiable interests of a director of the entity (or in the case of a trust, a director of the responsible entity of the trust) at the date that the director ceases to be a director. The entity must complete Appendix 3Z and give it to ASX no more than 5 business days after the director ceases to be a director.'*

3. Listing rule 3.19B which states that:

'An entity must make such arrangements as are necessary with a director of the entity (or in the case of a trust, a director of the responsible entity of the trust) to ensure that the director discloses to the entity all the information required by the entity to give ASX completed Appendices 3X, 3Y and 3Z within the time period allowed by listing rule 3.19.A. The entity must enforce the arrangements with the director.'

The Notice indicates that a change in Mr Rabbitt's notifiable interest occurred on 18 July 2025. It appears that the Notice should have been lodged with ASX by 25 July 2025. Consequently, ACU may have breached Listing Rules 3.19A and/or 3.19B.

Request for Information

Under Listing Rule 18.7, we ask that you answer each of the following questions having regard to Listing Rules 3.19A and 3.19B and *Guidance Note 22: Director Disclosure of Interests and Transactions in Securities - Obligations of Listed Entities*.

1. Please explain why the Appendix 3Y was lodged late.
2. What arrangements does ACU have in place under Listing Rule 3.19B with its directors to ensure that it is able to meet its disclosure obligations under Listing Rule 3.19A?
3. If the current arrangements are inadequate or not being enforced, what additional steps does ACU intend to take to ensure compliance with Listing Rule 3.19B?

When and where to send your response

This request is made under Listing Rule 18.7. Your response is required as soon as reasonably possible and, in any event, by no later than **9:00 AMAEST Friday, 1 August 2025**. You should note that if the information requested by this letter is information required to be given to ASX under Listing Rule 3.1 and it does not fall within the exceptions mentioned in Listing Rule 3.1A, ACU's obligation is to disclose the information 'immediately'. This may require the information to be disclosed before the deadline set out in the previous paragraph and may require ACU to request a trading halt immediately.

Your response should be sent to me by e-mail at ListingsComplianceSydney@asx.com.au. It should not be sent directly to the ASX Market Announcements Office. This is to allow me to review your response to confirm that it is in a form appropriate for release to the market, before it is published on the ASX Market Announcements Platform.

Trading halt

If you are unable to respond to this letter by the time specified above, you should discuss with us whether it is appropriate to request a trading halt in ACU's securities under Listing Rule 17.1. If you wish a trading halt, you must tell us:

- the reasons for the trading halt;
- how long you want the trading halt to last;
- the event you expect to happen that will end the trading halt;
- that you are not aware of any reason why the trading halt should not be granted; and
- any other information necessary to inform the market about the trading halt, or that we ask for.

We require the request for a trading halt to be in writing. The trading halt cannot extend past the commencement of normal trading on the second day after the day on which it is granted. You can find further information about trading halts in *Guidance Note 16 Trading Halts & Voluntary Suspensions*.

Suspension

If you are unable to respond to this letter by the time specified above, ASX will likely suspend trading in ACU's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

In responding to this letter, you should have regard to ACU's obligations under Listing Rules 3.1 and 3.1A and also to Guidance Note 8 *Continuous Disclosure*: Listing Rules 3.1 – 3.1B. It should be noted that ACU's obligation to disclose information under Listing Rule 3.1 is not confined to, nor is it necessarily satisfied by, answering the questions set out in this letter.

Release of correspondence between ASX and entity

ASX reserves the right to release all or any part of this letter, your reply and any other related correspondence between us to the market under Listing Rule 18.7A.

Yours sincerely

ASX Compliance