ASTRON

ASX Announcement

ASX Code: **ATR**

19 November 2025

Redomicile Update – ATO Class Ruling Received

Astron Limited (ASX:ATR) (**Astron Limited** or the **Company**) is pleased to advise that the Australian Taxation Office (**ATO**) has issued Class Ruling CR 2025/79 (the **Scheme Ruling**) in relation to the approved scheme of arrangement (**Scheme**) whereby the parent company of the Astron Group[1] was redomiciled from Hong Kong to Australia (**Redomicile**).

The Redomicile Transaction

The Scheme involved the newly established Australian company, Astron Limited, becoming the listed parent company of the Astron Group and the securities of the former, Hong Kong registered company, Astron Corporation Limited (**ASC**), being replaced with Astron Limited securities on a two for one (2:1) basis.

The Redomicile is expected to provide long-term shareholder benefits including streamlining of the Group's corporate structure, co-locating in Australia its registered office and its principal assets and business activities, removal of barriers to the Company's identity as an Australian Company, reducing complications related to trading of CHESS Depositary Interests (**CDI**s) on the ASX and shareholder participation in the business of the Company.

The Scheme was implemented on 29 August 2025.

The Scheme Ruling

The Scheme Ruling contains details about the taxation treatment applicable to certain securityholders of ASC who received shares and, or options in Astron Limited pursuant to the Scheme.

ASC securityholders who participated in the Scheme, and held their shares, CDIs or options (**Securities**) on capital account, and were either an Australian resident for tax purposes or a foreign resident, and whose Securities were "taxable Australian property" (**Eligible Securityholders**) will now be able to:

- choose capital gains tax (**CGT**) roll-over relief in relation to the Scheme as a result of the class ruling, resulting in the deferral of taxation of any capital gain attributable to the Scheme;
- have the cost base for the Astron Limited shares or options which were received as a result of the Scheme, the same as the cost base of their corresponding ASC Securities which were held immediately prior to implementation of the Scheme;
- for CGT discount purposes, have their Astron Limited shares or options received pursuant to the Scheme deemed to have been acquired at the time they acquired the corresponding ASC Securities which were held immediately prior to implementation of the Scheme.

As outlined in the Scheme Document, if an Eligible Securityholder chooses to elect CGT roll-over relief, the Eligible Securityholder must:

- Inform the Company that it intends to elect to obtain roll-over relief and inform the Company of the cost base of its ASC Securities by completing the Roll-over Election Form that accompanied the Scheme Document and returning it to the Company's share registry, Computershare, in accordance with the instructions in that form; and
- Make its election to obtain roll-over relief by not including any capital gain relating to its disposal of ASC Securities in the income tax return for the 2026 financial year. (Please note that no notice seeking to claim roll-

[1] 'Astron Group' means the Company together with its controlled subsidiaries.

over needs to be lodged with the ATO; rather, the way in which the Eligible Securityholder prepares its income tax return is sufficient evidence of making this choice)

As the roll-over relief is a joint choice by the Eligible Securityholder and the Company, Astron Limited will choose to obtain roll-over relief to the extent that the choice is made by Eligible Securityholders and communicated to the Company by completion of the Roll-over Election Form.

Securityholders that require a replacement personalised Roll-over Election Form should contact the Company's share registry, Computershare, on +61 3 9415 5000. Alternatively, a blank Roll-Over Election Form is available on the Company's website via the following link: https://astronlimited.com.au/wp-content/uploads/2025/11/ATR-Court-Meeting-Rollover-Election-Form.pdf

The above does not take into account the individual circumstances of particular Eligible Securityholders and does not constitute tax advice. Eligible Securityholders should seek advice from an appropriate professional advisor on the tax implications of the Scheme based on their own individual circumstances. General information regarding the tax implications of the Scheme for Australian resident shareholders and foreign resident shareholders whose shares are taxable Australian property is contained in the Scheme Document prepared in relation to the Scheme.

The Scheme Ruling can be viewed or downloaded from the ATO website via the following link:
https://www.ato.gov.au/law/view/document?docid=CLR/CR202579/NAT/ATO/00001

This announcement is authorised for release by the Managing Director of Astron Limited.

For further information, contact:

Tiger Brown	Joshua Theunissen
Managing Director	*Australian Company Secretary*
+61 3 5385 7088	+61 3 5385 7088
contact@astronlimited.com	contact@astronlimited.com

About Astron

Astron Limited (ASX: ATR) is an ASX listed company, with over 35 years of experience in mineral sands processing and downstream product development, as well as the marketing and sales of zircon and titanium dioxide products. Astron's prime focus, in association with joint venture partner, Energy Fuels Inc, is the development of its Donald Rare Earth and Mineral Sands Project in regional Victoria. The Donald Rare Earth and Mineral Sands Project has the potential to become a globally significant, long-life supplier of critical rare earth elements, including neodymium, praseodymium, dysprosium, terbium, as well as zircon and titanium minerals. In addition to its Australian assets, the Group operates a mineral sands sales and trading operations.