

Review of the Company's Continuous Disclosure Procedures Relating to the Release of Material Information Generated Through Collaborative Research

Bio-Gene Technology Limited (ASX: BGT, Bio-Gene or the Company), an Australian company developing the next generation of novel insecticides derived from nature, provides an update to the market in relation to its review of the Company's continuous disclosure procedures related to the release of material scientific information (**Information**) generated through external collaborative scientific research.

On 24 September 2025 the Company received an ASX Aware Letter relating to the circumstances leading up to the Company's announcement on 23 September 2025 titled '*Positive Flavocide Efficacy Results Presented*'. The Company's response to the ASX Aware Letter was released to the market on 29 September 2025.

The Company received a further letter from the ASX dated 15 October 2025 following the ASX's review of the sequence of events leading up to the Company's announcement on 23 September 2025. In this letter the ASX advised the Company that it has concluded that BGT breached Listing Rule 3.1 by failing to immediately disclose the Information as soon as that information could no longer be considered confidential, despite the information potentially remaining incomplete. ASX considers this breach to have occurred from, at the least, 10 September 2025.

The ASX acknowledges the relevant academic research collaborator (**Research Collaborator**) had not provided the Company with a copy of the Information presented to the relevant conference and recognises BGT's efforts to obtain a final copy of the presentation slides following the presentation.

ASX is of the view, however, that BGT should have adopted greater care and planning to address its continuous disclosure obligation prior to the release of the Information at the relevant conference and taken additional steps to manage its disclosure obligations, such as (1) agreeing a process with the Research Collaborator to ensure that the confidentiality of the Information was maintained, (2) agreeing with the Research Collaborator that BGT could announce the information once BGT could no longer rely on the carve-outs set out in Listing Rule 3.1A; and/or (3) seeking a trading halt and/or a voluntary suspension until BGT was in a position to release the Information.

The Company will undertake a review of its policies and procedures related to its continuous disclosure obligations and reliance on the Listing Rule 3.1A exemptions in the context of the matter outlined above, pursuant to Listing Rule 18.8.

The Company intends to take the following steps in response to the ASX direction at the time of this announcement: (1) strengthening protocols for managing third-party collaborative research, the release of results of this research and conference presentations involving potentially market-sensitive information; (2) enhancing internal escalation procedures for assessing disclosure obligations under Listing Rule 3.1 and the carve-outs under Listing Rule 3.1A; and (3) providing targeted internal training on ASX's expectations regarding confidentiality and disclosure timing, including the use of trading halts or voluntary suspensions where appropriate.

The Company will make a further announcement after completing its review of the Company's continuous disclosure procedures relating to the release of material information generated through collaborative research.

Approved for release on ASX by Bio-Gene Board of Directors.

- ENDS -

For further information, please contact:

Bio-Gene Technology Limited:
E: bgt.info@bio-gene.com.au

Matthew Wright
NWR Communications
E: matt@nwrcommunications.com.au
M: 0451 896 420

About Bio-Gene Technology Limited

Bio-Gene is an Australian company developing novel bio-insecticides to address the global challenges of insecticide resistance. Its unique products are based on a naturally occurring class of compounds proven to overcome resistance to control pests with minimal impact on human health and the environment.

Bio-Gene's products have multiple applications across crop protection, grain storage, public health and consumer uses. They provide new options derived from nature to meet market demand for effective and safe pest management solutions.

www.bio-gene.com.au

Flavocide® and Qcide® are registered trademarks of Bio-Gene Technology Limited.
