

Disclosure of movement of 1% or more in substantial holding
or change in nature of relevant interest, or both

Sections 277 and 278, Financial Markets Conduct Act 2013

Note: This form must be completed in accordance with the instructions at the end of the form.

To NZX

And

To [Gentrack Group Ltd](#)

Relevant event being disclosed: [Change of Substantial Shareholding by 1% or more](#)

Date of relevant event: [28 November 2025](#)

Date this disclosure made: [02 December 2025](#)

Date last disclosure made: [19 August 2025](#)

Substantial product holder(s) giving disclosure

Full name(s): [Regal Funds Management Pty Ltd](#)

Summary of substantial holding

Class of quoted voting products: [Ordinary Shares, ISIN: NZGTKE0002S9](#)

Summary for [Regal Funds Management Pty Ltd](#)

For this disclosure,—

- (a) total number held in class: [9,130,207](#)
- (b) total in class: [108,197,139](#)
- (c) total percentage held in class: [8.438%](#)

For **last** disclosure,—

- (a) total number held in class: [7,826,632](#)
- (b) total in class: [107,721,896](#)
- (c) total percentage held in class: [7.266%](#)

Details of transactions and events giving rise to relevant event

In the period from the last disclosure, as part of normal on-market trading activity Regal Funds Management Pty Limited total buy = 2,242,632 shares (\$19,078,357.10 AUD), 3,500 shares (\$33,199.60 NZD) and total sell = 942,557 shares (\$7,910,661.32 AUD).

Details of relevant interests

Details for Regal Funds Management Pty Ltd

Nature of relevant interest(s): Relevant interest by virtue of Regal Funds Management Pty Limited having the power to acquire or dispose of financial products in its capacity as trustee and manager of the Regal Atlantic Absolute Return Fund, Regal Tasman Market Neutral Fund, Regal Australian Long Short Equity Fund, Regal Australian Active Extension Trust, Regal No. 3 Fund, Regal Australia Small Companies Fund, Regal Australia Small Companies Trust, Regal Global Small Companies Fund, Regal Investment Fund, Regal Partners Private Fund, Regal Emerging Companies Opportunities Fund, Regal Tactical Opportunities Fund

For that relevant interest,—

- (a) number held in class: 7,637,798
- (b) percentage held in class: 7.059%
- (c) current registered holder(s):

Regal Atlantic Absolute Return Fund (0.046%), (HSBC Custody Nominees (Australia))
Regal Atlantic Absolute Return Fund (0.046%), (J.P. Morgan Prime Nominees Ltd)
Regal Atlantic Absolute Return Fund (0.046%), (Merrill Lynch (Aus) Nominees Pty Ltd)
Regal Atlantic Absolute Return Fund (0.060%), (Citicorp Nominees Pty Ltd)
Regal Atlantic Absolute Return Fund (0.164%), (UBS Nominees Pty Ltd)
Regal Australia Small Companies Fund (0.002%), (J.P. Morgan Prime Nominees Ltd)
Regal Australia Small Companies Fund (0.588%), (Citicorp Nominees Pty Ltd)
Regal Australia Small Companies Fund (1.491%), (UBS Nominees Pty Ltd)
Regal Australia Small Companies Trust (0.001%), (J.P. Morgan Prime Nominees Ltd)
Regal Australia Small Companies Trust (0.154%), (HSBC Custody Nominees (Australia) Limited A/C 2)
Regal Australia Small Companies Trust (0.303%), (Citicorp Nominees Pty Ltd)
Regal Australia Small Companies Trust (0.664%), (UBS Nominees Pty Ltd)
Regal Australian Active Extension Trust (0.031%), (Citicorp Nominees Pty Ltd)
Regal Australian Active Extension Trust (0.179%), (HSBC Custody Nominees (Australia) Limited A/C 2)
Regal Australian Active Extension Trust (0.184%), (UBS Nominees Pty Ltd)
Regal Australian Long Short Equity Fund (0.074%), (Citicorp Nominees Pty Ltd)
Regal Emerging Companies Opportunities Fund (0.108%), (J.P. Morgan Prime Nominees Ltd)
Regal Emerging Companies Opportunities Fund (0.159%), (Citicorp Nominees Pty Ltd)
Regal Emerging Companies Opportunities Fund (0.213%), (Merrill Lynch (Aus) Nominees Pty Ltd)
Regal Emerging Companies Opportunities Fund (0.712%), (UBS Nominees Pty Ltd)
Regal Global Small Companies Fund (0.069%), (J.P. Morgan Prime Nominees Ltd)
Regal Global Small Companies Fund (0.131%), (Citicorp Nominees Pty Ltd)
Regal Global Small Companies Fund (0.139%), (UBS Nominees Pty Ltd)
Regal Investment Fund (0.002%), (HSBC Custody Nominees (Australia))
Regal Investment Fund (0.057%), (J.P. Morgan Prime Nominees Ltd)
Regal Investment Fund (0.095%), (Citicorp Nominees Pty Ltd)
Regal Investment Fund (0.392%), (UBS Nominees Pty Ltd)
Regal No. 3 Fund (0.040%), (UBS Nominees Pty Ltd)
Regal Partners Private Fund (0.008%), (HSBC Custody Nominees (Australia) Limited A/C 2)
Regal Partners Private Fund (0.029%), (J.P. Morgan Prime Nominees Ltd)
Regal Partners Private Fund (0.031%), (Citicorp Nominees Pty Ltd)

Regal Partners Private Fund (0.248%), (UBS Nominees Pty Ltd)
Regal Tactical Opportunities Fund (0.035%), (J.P. Morgan Prime Nominees Ltd)
Regal Tactical Opportunities Fund (0.079%), (Citicorp Nominees Pty Ltd)
Regal Tactical Opportunities Fund (0.092%), (HSBC Custody Nominees (Australia))
Regal Tactical Opportunities Fund (0.092%), (Merrill Lynch (Aus) Nominees Pty Ltd)
Regal Tactical Opportunities Fund (0.188%), (UBS Nominees Pty Ltd)
Regal Tasman Market Neutral Fund (0.018%), (Citicorp Nominees Pty Ltd)
Regal Tasman Market Neutral Fund (0.087%), (UBS Nominees Pty Ltd)

Details of relevant interests

Details for [Regal Funds Management Pty Limited](#)

Nature of relevant interest(s): [derivative relevant interest over quoted underlying](#).

For that relevant interest,—

- (a) number held in class: [1,492,409](#)
- (b) percentage held in class: [1.379%](#)
- (c) current registered holder(s):

[Amazon Market Neutral Fund \(0.032%\), \(Merrill Lynch \(Aus\) Nominees Pty Ltd\)](#)
[Amazon Market Neutral Fund \(0.052%\), \(UBS Nominees Pty Ltd\)](#)
[Amazon Market Neutral Fund \(0.053%\), \(J.P. Morgan Prime Nominees Ltd\)](#)
[Amazon Market Neutral Fund \(0.060%\), \(Citicorp Nominees Pty Ltd\)](#)
[Regal Tactical Opportunities \(Offshore\) Master Fund \(0.068%\), \(Citicorp Nominees Pty Ltd\)](#)
[Regal Tactical Opportunities \(Offshore\) Master Fund \(0.151%\), \(J.P. Morgan Prime Nominees Ltd\)](#)
[Regal Tactical Opportunities \(Offshore\) Master Fund \(0.206%\), \(UBS Nominees Pty Ltd\)](#)
[Zambezi Absolute Return Fund \(0.108%\), \(Citicorp Nominees Pty Ltd\)](#)
[Zambezi Absolute Return Fund \(0.122%\), \(J.P. Morgan Prime Nominees Ltd\)](#)
[Zambezi Absolute Return Fund \(0.167%\), \(HSBC Custody Nominees \(Australia\)\)](#)
[Zambezi Absolute Return Fund \(0.174%\), \(Merrill Lynch \(Aus\) Nominees Pty Ltd\)](#)
[Zambezi Absolute Return Fund \(0.186%\), \(UBS Nominees Pty Ltd\)](#)

- (d) registered holder(s) once transfers are registered: [Unknown](#)

Details of transactions and events giving rise to substantial holding

Details of the transactions or other events requiring disclosure: [\(refer attached\)](#)

Additional information

Address(es) of substantial product holder(s): [Regal Funds Management Pty Ltd](#)
[Level 46, 1 Macquarie Place, NSW, 2000, Sydney, Australia](#)
Contact details: [Regal Funds Management Pty Ltd](#)
Ph: [+61 2 8197 4333](#)
Email: reception@regalfm.com

Name of any other person believed to have given, or believed to be required to give, a disclosure under the Financial Markets Conduct Act 2013 in relation to the financial products to which this disclosure relates: [N/A](#)

Certification

I, [Ian Cameron](#) certify that, to the best of my knowledge and belief, the information contained in this disclosure is correct and that I am duly authorised to make this disclosure by all persons for whom it is made.



Date: 02/12/2025

Ian Cameron
Director
Regal Funds Management

Attachment**GTK – Disclosure of movement of 1% or more in substantial Shareholding by Regal Funds Management Pty Limited dated 28/11/2025****Details of Derivative**

Parties to the Derivative	UBS Nominees Pty Ltd, Zambezi Absolute Return Fund	UBS Nominees Pty Ltd, Amazon Market Neutral Fund	UBS Nominees Pty Ltd, Regal Tactical Opportunities (Offshore) Master Fund
Notional number of underlying financial products	201,153	56,509	222,659
Cash or physical settled	Cash settled swap	Cash settled swap	Cash settled swap
Maturity Date	13 September 2027	17 September 2027	5 July 2028
Expiry Date	n/a	n/a	n/a
Entry price	AUD 6.64 – AUD 11.52	AUD 9.75 – AUD 10.32	AUD 8.41 – AUD 11.46
How value of derivative determined by value of the underlying	Mark to market	Mark to market	Mark to market

Parties to the Derivative	Merrill Lynch (Aus) Nominees Pty Ltd, Zambezi Absolute Return Fund	Merrill Lynch (Aus) Nominees Pty Ltd, Amazon Market Neutral Fund	Goldman Sachs International, London, Zambezi Absolute Return Fund
Notional number of underlying financial products	188,478	35,000	180,808
Cash or physical settled	Cash settled swap	Cash settled swap	Cash settled swap
Maturity Date	24 March 2027 25 October 2027	15 April 2027	2 March 2029
Expiry Date	n/a	n/a	n/a
Entry price	AUD 7.80 – AUD 9.60	AUD 9.75	AUD 5.71
How value of derivative determined by value of the underlying	Mark to market	Mark to market	Mark to market

Parties to the Derivative	J.P. Morgan Prime Nominees Ltd, Zambezi Absolute Return Fund	J.P. Morgan Prime Nominees Ltd, Amazon Market Neutral Fund	J.P. Morgan Prime Nominees Ltd, Regal Tactical Opportunities (Offshore) Master Fund
Notional number of underlying financial products	131,776	57,194	163,163
Cash or physical settled	Cash settled swap	Cash settled swap	Cash settled swap
Maturity Date	1 December 2027	1 December 2026	1 September 2027
Expiry Date	n/a	n/a	n/a
Entry price	AUD 10.03	AUD 10.58	AUD 8.79
How value of derivative determined by value of the underlying	Mark to market	Mark to market	Mark to market

Parties to the Derivative	Citicorp Nominees Pty Ltd, Zambezi Absolute Return Fund	Citicorp Nominees Pty Ltd, Amazon Market Neutral Fund	Citicorp Nominees Pty Ltd, Regal Tactical Opportunities (Offshore) Master Fund
Notional number of underlying financial products	117,257	65,289	73,123
Cash or physical settled	Cash settled swap	Cash settled swap	Cash settled swap
Maturity Date	4 October 2027	4 October 2027	2 October 2026
Expiry Date	n/a	n/a	n/a
Entry price	AUD 9.51	AUD 11.70	AUD 9.42
How value of derivative determined by value of the underlying	Mark to market	Mark to market	Mark to market