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19 December 2025

The Manager Companies
ASX Limited
20 Bridge Street
Sydney NSW 2000

(2 pages by email)

Dear Madam

I attach the Top 20 Option Holders and Distribution Schedule for the listed options issued on today's Appendixes 2A.

This announcement has been approved by the Company's Managing Director.

Yours faithfully



Marcelo Mora
Company Secretary

pjn12827

BIOTRON LIMITED
Top 20 Holders Snapshot

OPTIONS As of 19 Dec 2025
Composition : Options expiring 24 Nov 2027

Rank	Name	Units	% of Units
1.	BERNE NO 132 NOMINEES PTY LTD <791994 A/C>	58,447,500	20.20
2.	10 BOLIVIANOS PTY LTD	30,022,828	10.38
3.	THE TRUST COMPANY (AUSTRALIA) LIMITED <SBF A/C>	24,885,834	8.60
4.	JEY INVESTMENT PTY LTD	19,500,000	6.74
5.	ROOKHARP CAPITAL PTY LIMITED	12,500,000	4.32
6.	MR ALEXANDER LEWIT	10,000,000	3.46
7.	LILLUCY PTY LTD <LILYPILY SUPER FUND A/C>	10,000,000	3.46
8.	BVB CUSTODIAN PTY LTD <BVB A/C>	8,333,334	2.88
9.	JAMES HACHEM WEALTH PTY LTD	8,333,334	2.88
10.	KOVIG INVESTMENTS PTY LTD <KOVIGORDON FAMILY A/C>	8,333,334	2.88
11.	MR ANTANAS GUOGA	8,310,500	2.87
12.	3M HOLDINGS PTY LIMITED <3M INVESTMENT SPEC A/C>	7,500,000	2.59
13.	ROOKHARP CAPITAL PTY LIMITED	5,555,556	1.92
14.	ON-RAMP PTY LTD	5,000,000	1.73
15.	MR YANG YE	5,000,000	1.73
16.	RIYA INVESTMENTS PTY LTD	4,833,334	1.67
17.	UMBIRAM PTY LTD <MICHAEL HOY SUPERFUND A/C>	3,739,118	1.29
18.	MR DEAN KAVANAGH	3,333,334	1.15
19.	MRS SHARON LEWIS	2,496,290	0.86
20.	TROMSO PTY LTD	2,000,000	0.69
Totals: Top 20 holders of OPTIONS		238,124,296	82.31
Total Remaining Holders Balance		51,185,715	17.69

BIOTRON LIMITED
Distribution Spread

OPTIONS As of 19 Dec 2025
Composition : Options expiring 24 Nov 2027

Range	Total holders	Units	% of Issued Capital
1 - 1,000	37	19,170	0.01
1,001 - 5,000	101	262,276	0.09
5,001 - 10,000	47	358,583	0.12
10,001 - 100,000	162	6,271,321	2.17
100,001 - 9,999,999,999	117	282,398,661	97.61
Rounding			0.00
Total	464	289,310,011	100.00