

Form 603Corporations Law
Section 671B**Notice of initial substantial holder**To Company
Name/Scheme Australian Clinical Labs LimitedACN/ARBN 645 711 128**1. Details of substantial holder (1)**Name Franklin Resources, Inc., and its affiliatesACN (if applicable) N/AThe holder became a substantial holder on 2 April 2026**2. Details of voting power**

The total number of votes attached to all the voting shares in the company or voting interests in the scheme that the substantial holder or an associate (2) had a relevant interest (3) in on the date the substantial holder became a substantial holder are as follows:

| Class of securities (4) | Number of securities | Persons' votes (5) | Voting power (6) |
|-------------------------|----------------------|--------------------|--|
| Ordinary shares | 9,494,663 | 9,494,663 | 5.02% (based on 189,100,144 shares) |

3. Details of relevant interests

The nature of the relevant interest the substantial holder or an associate had in the following voting securities on the date the substantial holder became a substantial holder are as follows:

| Holder of relevant interest | Name of relevant interest (7) | Class and number of securities |
|-----------------------------|-------------------------------|--------------------------------|
| See Annexure B, item 1 | See Annexure B, item 2 | See Annexure B, item 3 |

4. Details of present registered holders

The persons registered as holders of the securities referred to in paragraph 3 above are as follows:

| Holder of relevant interest | Registered holder of securities | Person entitled to be registered as holder (8) | Class and number of securities |
|-----------------------------|---------------------------------|--|--------------------------------|
|-----------------------------|---------------------------------|--|--------------------------------|

| | | | |
|------------------------|------------------------|------------------------|-------------------------------|
| See Annexure B, item 1 | See Annexure B, item 6 | See Annexure B, item 8 | See Annexure B, items 3,7 & 9 |
|------------------------|------------------------|------------------------|-------------------------------|

5. Consideration

The consideration paid for each relevant interest referred to in paragraph 3 above, and acquired in the four months prior to the day that the substantial holder became a substantial holder is as follows:

| Holder of relevant interest | Date of acquisition | Consideration (9) | | Class and number of securities |
|-----------------------------|------------------------|------------------------|------------------------|--------------------------------|
| | | Cash | Non-Cash | |
| See Annexure B, item 1 | See Annexure B, item 4 | See Annexure B, item 5 | See Annexure B, item 5 | See Annexure B, item 3 |

6. Associates

The reasons the persons named in paragraph 3 above are associates of the substantial holder are as follows:

| Name and ACN (if applicable) | Nature of association |
|--|-----------------------|
| The persons referred to in paragraph 1 of Annexure A are associates of Franklin Resources, Inc. by virtue of being a related body. | |

7. Addresses

The addresses of persons named in this form are as follows:

| Name | Address |
|----------------|----------------|
| See Annexure A | See Annexure A |

Signature

print name Thomas C. Mandia

Capacity: Assistant Secretary, Franklin Resources, Inc.

sign here

DocuSigned by:
Thomas C. Mandia
B37A8253114D4C0

Date 6 April 2026

Annexure A

1 Names and addresses of all associates for whom composite notice is given:

| Name | Address |
|---|--|
| Benefit Street Partners L.L.C | c/o The Corporation Trust Center, 1209 Orange Street, Wilmington, New Castle County, Delaware 19801, United States |
| Brandywine Global Investment Management, LLC | 1735 Market Street / Suite 1800 / Philadelphia, PA 19103, United States |
| Clarion Partners Europe (U.K.) Limited | 1 Southampton Street, London, WC2R 0LR, United Kingdom |
| Clarion Partners, LLC | c/o Corporation Service Company, 80 State Street, Albany, NY, 12207, United States |
| Clarion Partners Holdings LLC | c/o United Agent Group Inc., Brandywine Plaza, 1521 Concord pike, Suite 201, Wilmington, DE, 19803, United States |
| ClearBridge Investment Management Limited | 5 Morrison Street, Edinburgh, EH3 8BH, Scotland |
| ClearBridge Investments (North America) Pty Limited | Level 13, 35 Clarence Street, Sydney, NSW 2000, Australia |
| ClearBridge Investments Limited | Level 13, 35 Clarence Street, Sydney, NSW 2000, Australia |
| ClearBridge Investments, LLC | c/o United Agent Group Inc., Brandywine Plaza, 1521 Concord pike, Suite 201, Wilmington, DE, 19803, United States |
| Darby Overseas Partners, L.P. | c/o The Prentice-Hall Corporation System, Inc., 251 Little Falls Drive, Wilmington, DE, 19808, United States |
| ETP Holdings (Cayman) Limited | Walkers, 190 Elgin Avenue, Georgetown, Grand Cayman, KY1-9001, Cayman Islands; |
| Fiduciary Trust Company of Canada | 200 King Street West, Suite 1400, Toronto, ON, M5H 3T4, Canada |
| Fiduciary Trust International, LLC | c/o Corporation Service Company, 251 Little Falls Drive, Wilmington, DE, 19808, United States |
| Fiduciary International Holding, Inc. | 280 Park Avenue, New York, NY, 10017, United States |
| Fiduciary Trust Company International | 280 Park Avenue, New York, NY, 10017, United States |
| Franklin Advisers, Inc. | c/o United Agent Group Inc., 4640 Admiralty Way, 5th Floor, Marina del Rey, CA, 90292, United States |
| Franklin Advisory Services, LLC | c/o United Agent Group Inc., Brandywine Plaza, 1521 Concord Pike, Suite 201, Wilmington, DE, 19803, United States |
| Franklin Mutual Advisers, LLC | c/o United Agent Group Inc., Brandywine Plaza, 1521 Concord Pike, Suite 201, Wilmington, DE, 19803, United States |

| | |
|---|---|
| Franklin Templeton Asset Management (India) Private Limited | One International Centre, Tower 2, 12 and 13 th Floor, Senapati Bapat Marg, Elphinstone (West), Mumbai, Mumbai City, Maharashtra-MH, 400013, India |
| Franklin Templeton Asset Management (Malaysia) Sdn. Bhd. | Suite 31-02, 31st Floor, Menara Keck Seng, 203 Jalan Bukit Bintang, Kuala Lumpur, 55100, Malaysia |
| Franklin Templeton Asset Management Mexico, S.A. de C.V., Sociedad Operadora de Fondos de Inversión | Avenida Paseo de la Reforma 342, Colonia Juarez, Mexico City, CP. 06600, Mexico |
| Franklin Templeton Australia Limited | Level 47, 120 Collins Street, Melbourne, VIC 3000, Australia |
| Franklin Templeton (Australia) Holdings Pty Ltd. | Level 48, 120 Collins Street, Melbourne, VIC 3000, Australia |
| Franklin Templeton Capital Holdings Private Limited; | United Agent Group Inc., Brandywine Plaza, 1521 Concord Pike, Suite 201, Wilmington, DE, 19803, United States; |
| Franklin Templeton Fund Adviser, LLC | c/o United Agent Group Inc., Brandywine Plaza, 1521 Concord Pike, Suite 201, Wilmington, DE, 19803, United States |
| Franklin Templeton Fund Management Limited | Cannon Place, 78 Cannon Street, London, EC4N 6HL, England |
| Franklin Templeton GSC Asset Management Sdn. Bhd. | Suite 31-02, 31st Floor, Menara Keck Seng, 203 Jalan Bukit Bintang, Kuala Lumpur, 55100, Malaysia |
| Franklin Templeton Global Investors Limited | Cannon Place, 78 Cannon Street, London, EC4N 6HL, England |
| Franklin Templeton Holding Limited | Ocorian Corporate Services Limited, 6th Floor, Tower A, 1 Cyber City, Ebene, Mauritius |
| Franklin Templeton Institutional, LLC | c/o United Agent Group Inc., Brandywine Plaza, 1521 Concord Pike, Suite 201, Wilmington, DE, 19803, United States |
| Franklin Templeton International Services S.à.r.l. | 8A, rue Albert Borschette, L-1246, Luxembourg |
| Franklin Templeton Investimentos (Brasil) Ltda. | Avenida Brigadeiro Faria Lima 3311, 5th Floor, Itaim Bibi, Sao Paulo, 04538-133, Brazil |
| Franklin Templeton Investment Advisors Korea Co., Ltd | 3rd Floor, CCMM Building, 101 Yeouigongwon-ro, Yeongdeungpo-gu, Seoul, 07241, Republic of Korea |
| Franklin Templeton Investment Management Limited | Cannon Place, 78 Cannon Street, London, EC4N 6HL, England |
| Franklin Templeton Investment Trust Management Limited | 5 Morrison Street, Edinburgh, EH3 8BH, Scotland |
| Franklin Templeton Investments (Asia) Limited | 62/F., Two International Finance Centre, 8 Finance Street, Central, Hong Kong |
| Franklin Templeton Investments (ME) Limited | The Gate, East Wing, Level 2, Dubai International Financial Centre, P.O. Box 506613, Dubai, U.A.E. |
| Franklin Templeton Investments Corp. | 200 King Street West, Suite 1400, Toronto, ON, M5H 3T4, Canada |

| | |
|--|---|
| Franklin Templeton Japan Co., Ltd. | Shin Marunouchi Building, 36 th Floor, Marunouchi 1-5-1, Chiyoda-Ku, Tokyo, 100-6536, Japan |
| Franklin Templeton Luxembourg S.A. | 8A, rue Albert Borschette, L-1246, Luxembourg |
| Franklin Templeton Private Portfolio Group, LLC | c/o United Agent Group Inc., Brandywine Plaza, 1521 Concord Pike, Suite 201, Wilmington, DE, 19803, United States |
| FTC Investor Services Inc. | 200 King Street West, Suite 1500, Toronto, ON, M5H 3T4, Canada |
| K2 Advisors L.L.C. | c/o Corporation Service Company, 251 Little Falls Drive, Wilmington, DE, 19808, United States |
| K2/D&S Management Co., L.L.C. | c/o Corporation Service Company, 251 Little Falls Drive, Wilmington, DE, 19808, United States |
| K2 Advisors Holdings, LLC | c/o Corporation Service Company, 251 Little Falls Drive, Wilmington, DE, 19808, United States |
| Legg Mason Investment Funds Limited | Cannon Place, 78 Cannon Street, London, EC4N 6HL, England |
| Legg Mason Investments (Europe) Limited | Cannon Place, 78 Cannon Street, London, EC4N 6HL, England |
| Legg Mason Australia Holdings Pty Ltd | Level 47, 120 Collins Street, Melbourne, VIC 3000, Australia |
| Legg Mason Global Holdings Ltd | Walkers, 190 Elgin Avenue, Georgetown, Grand Cayman, KY1-9001, Cayman Islands |
| Legg Mason Global Holdings Ltd. | Walkers, 190 Elgin Avenue, Georgetown, Grand Cayman, KY1-9001, Cayman Islands |
| Legg Mason Royce Holdings, LLC. | c/o CSC-Lawyers Incorporating Service Company 7 St. Paul Street Suite 820 21202 Baltimore MD United States |
| Legg Mason, Inc. | c/o United Agent Group Inc., 2405 York Road Suite 201-C, Lutherville-Timonium, MD, 21093, United States |
| LM Holdings 2 Limited | Cannon Place, 78 Cannon Street, London, EC4N 6HL, England |
| O'Shaughnessy Asset Management, L.L.C. | c/o The Corporation Trust Company, 1209 Orange Street, Wilmington, New Castle Country, DE, 19801, United States |
| Putnam Investment Management, LLC | c/o The Corporation Trust Company, 1209 Orange Street, Wilmington, New Castle Country, DE, 19801, United States |
| The Putnam Advisory Company, LLC | c/o The Corporation Trust Company, 1209 Orange Street, Wilmington, New Castle Country, DE, 19801, United States |
| Putnam Investments Limited | 16 St. James's Street, London, SW1A 1ER, England |
| Putnam Advisory Holdings II, LLC | 100 Federal Street, Boston, MA, 02110, United State |
| Putnam U.S. Holdings I, LLC | 100 Federal Street, Boston, MA, 02110, United State |

| | |
|--|---|
| QS Batterymarch Financial Management, Inc. | c/o United Agent Group Inc., 2405 York Road Suite 201-C, Lutherville-Timonium, MD, 21093, United States |
| Royce & Associates, LP DBA Royce Investment Partners | c/o United Agent Group Inc., Brandywine Plaza, 1521 Concord Pike, Suite 201, Wilmington, DE, 19803, United States |
| Templeton Asset Management (Poland) TFI S.A. | Rondo 1, 26th Floor, Rondo ONZ 1, Warsaw, 00-124, Poland |
| Templeton Asset Management Ltd. | 7 Temasek Boulevard, #26-03 Suntec Tower One, 038987, Singapore |
| Templeton Global Advisors Limited | Box N-7759, Lyford Cay, Nassau, Bahamas |
| Templeton Global Holdings Ltd. | Box N-7759, Lyford Cay, Nassau, Bahamas |
| Templeton Hana Asset Management Co., Ltd. | 3rd Floor, CCMM Building, 12 Youido-Dong, Youngdungpo-gu, Seoul, 150-968, Republic of Korea |
| Templeton Investment Counsel, LLC | 300 S.E. 2nd Street, Fort Lauderdale, FL 33301, United States |
| Templeton International, Inc., | c/o United Agent Group Inc., Brandywine Plaza, 1521 Concord Pike, Suite 201, Wilmington, DE, 19803, United States |
| Templeton Worldwide, Inc. | c/o United Agent Group Inc., Brandywine Plaza, 1521 Concord Pike, Suite 201, Wilmington, DE, 19803, United States |
| Western Asset Management (Brazil) Holdings Limitada | Av. Presidente Juscelino Kubitschek, 1455, 15 th Floor, São Paulo, 04543-011, Brazil |
| Western Asset Management Company Distribuidora de Titulos e Valores Mobiliarios Limitada | Av, Presidente Juscelino Kubitschek, Sao Paulo-SP, CEP 04543-011 Brasil |
| Western Asset Management Company Limited | 10 Exchange Square, 10 th Floor, Primrose Street, London, EC2A 2EN, United Kingdom |
| Western Asset Management Company, LLC | 385 East Colorado Boulevard Pasadena, California, 91101, United States |
| Western Asset Management Company Ltd | Level 48, 120 Collins Street, Melbourne, Victoria, 3000, Australia |
| Western Asset Management Company Pte. Ltd. | 1 George Street, #23-01, 049145, Singapore |

ANNEXURE B**DETAILS OF ENTITLEMENTS AND RELEVANT INTERESTS**

| Holder of relevant interest | Date of acquisition | Consideration (9) | | Class and number of securities |
|--|---------------------|-------------------|----------|--------------------------------|
| | | Cash (AUD) | Non-Cash | Ordinary |
| Franklin Templeton Australia Limited | 23-Dec-2025 | (135,027) | | 49,692 |
| Franklin Templeton Australia Limited | 24-Dec-2025 | (109,274) | | 40,478 |
| Franklin Templeton Australia Limited | 29-Dec-2025 | (67,149) | | 24,813 |
| Franklin Templeton Australia Limited | 30-Dec-2025 | (48,452) | | 17,787 |
| Franklin Templeton Australia Limited | 31-Dec-2025 | (90,623) | | 33,228 |
| Franklin Templeton Australia Limited | 2-Jan-2026 | (123,056) | | 45,268 |
| Franklin Templeton Australia Limited | 8-Jan-2026 | (4,478,143) | | 1,687,398 |
| Franklin Templeton Australia Limited | 13-Jan-2026 | (54,460) | | 20,277 |
| Franklin Templeton Australia Limited | 15-Jan-2026 | (4,254,372) | | 1,600,000 |
| Franklin Templeton Australia Limited | 16-Jan-2026 | (131,874) | | 49,890 |
| Franklin Templeton Australia Limited | 19-Jan-2026 | (106,932) | | 40,881 |
| Franklin Templeton Australia Limited | 23-Jan-2026 | (225,148) | | 84,973 |
| Franklin Templeton Australia Limited | 27-Jan-2026 | (28,943) | | 10,990 |
| Franklin Templeton Australia Limited | 28-Jan-2026 | (452,971) | | 169,008 |
| Franklin Templeton Australia Limited | 29-Jan-2026 | (149,978) | | 55,966 |
| Franklin Templeton Australia Limited | 30-Jan-2026 | (404,337) | | 148,494 |
| Franklin Templeton Australia Limited | 2-Feb-2026 | (370,493) | | 133,112 |
| Franklin Templeton Australia Limited | 3-Feb-2026 | (936,962) | | 328,878 |
| Franklin Templeton Australia Limited | 10-Feb-2026 | (247,462) | | 98,397 |
| Franklin Templeton Australia Limited | 6-Mar-2026 | (45,168) | | 20,524 |
| Franklin Templeton Australia Limited | 27-Mar-2026 | (61,116) | | 30,072 |
| Franklin Templeton Australia Limited | 30-Mar-2026 | (190,122) | | 93,993 |
| Franklin Templeton Australia Limited | 31-Mar-2026 | (423,433) | | 203,482 |
| Franklin Templeton Australia Limited | 1-Apr-2026 | (383,116) | | 187,000 |
| Franklin Templeton Australia Limited | 2-Apr-2026 | (1,151,401) | | 570,844 |
| O'Shaughnessy Asset Management, L.L.C. | 16-Dec-2025 | (100,895) | | 35,903 |
| O'Shaughnessy Asset Management, L.L.C. | 17-Dec-2025 | (406,474) | | 145,507 |
| O'Shaughnessy Asset Management, L.L.C. | 18-Dec-2025 | (173,886) | | 61,976 |
| O'Shaughnessy Asset Management, L.L.C. | 18-Feb-2026 | (260,821) | | 118,917 |

| Registered Holder of Shares | Class of Shares | Number of Shares |
|------------------------------------|------------------------|-------------------------|
| BANK OF NEW YORK NY | Ordinary | 48,533 |
| BROWN BROS. HARRIMAN | Ordinary | 86,990 |
| CITIBANK HK | Ordinary | 547,698 |
| Citigroup Pty Limited. | Ordinary | 5,279,735 |
| JP MORGAN CHASE AUST SYDN | Ordinary | 3,148,448 |
| Northern Trust Singapore | Ordinary | 383,259 |

NOTES

1. Nature of Relevant Interest:

- Except as provided below, the relevant interest of each of FRI and the bodies corporate referred to in paragraph 1 of Annexure A was acquired by virtue of an associate of, or related body corporate each of FRI and the bodies corporate referred to in paragraph 1 of Annexure A, acquiring a relevant interest in voting shares of the company.
- The nature of the relevant interest acquired by the bodies corporate referred to in item 1 of Annexure B in relation to the voting shares referred to in item 3 of Annexure B arose by virtue of those companies having the right to dispose of the shares in the company as a result of the Investment Management Agreements.
- Particulars of any relevant agreement or other circumstances by which the relevant interest was acquired: the interests were acquired in the ordinary course of business on the stock market of a stock exchange in accordance with the rules of the stock exchange and containing no terms or conditions other than the standard terms or conditions.
- Particulars of any qualification of the power of a person to exercise, control the exercise of, or influence the exercise of, the voting powers or disposal of the shares to which the relevant interests relates: not applicable.

2. Consideration

Details of any and all benefits other than money, that any person from whom a relevant interest was acquired has, or may, become entitled to receive in relation to that acquisition: not applicable.