9July 2025
Reference: 110604

Attention: Melissa Kostopoulos
Adviser Listings Compliance
ASX Limited
Level 50, South Tower, Rialto
525 Collins Street, Melbourne
VIC 3000

By email: ListingsComplianceMelbourne@asx.com.au

We refer to your letter dated 3 July 2025 regarding Biome Australia Limited's (**ASX:BIO**) (the '**Company'** or '**BIO**') announcement entitled 'Biome Achieves Record Sales Revenue' released on the ASX Market Announcements Platform ('**MAP**') at 8:44am EST on 1 July 2025 (the '**Announcement**').

1. **Does BIO consider the information disclosed in the Announcement and in particular**

   1.1. **'Unaudited full-year sales revenue of ~$18.4million for FY25, representing 41% growth versus the previous corresponding period ($13.01m FY24).'**

   1.2. **'Biome recorded its strongest quarter to-date in Q4 FY25, with sales revenue exceeding $5 million, a 33% increase over the previous corresponding period (PCPQ4FY24: $3.78 million).'**

   1.3. **'Record monthly sales in June of ~$2.1 million, up 50% vs PCP.'**

   or any part thereof to be information that investors and their professional advisers would reasonably require for the purpose of making an informed assessment of either:

   1.4. **the assets and liabilities, financial position and performance, profits and losses and prospects of BIO; or**

   1.5. **the rights and liabilities attaching to the relevant securities?**

   Yes, BIO considers that the information disclosed in the Announcement was information that investors and their professional advisers would reasonably require for the purpose of making an informed assessment of the assets and liabilities, financial position and performance, profits and losses and prospects of BIO.

2. **If the answer to either 1.4 or 1.5 is 'no', please advise the basis for that view.**

   The information disclosed in the Announcement does not relate to the rights and liabilities attaching to BIO securities.

3. **Does BIO consider the Announcement to include information which is reasonable for investors and their professional advisers to expect to find in a disclosure document?**

   Yes.

4. **If the answer to question 3 is 'no', please advise the basis for that view.**

   Not applicable.

5. **If the answer to question 3 is 'yes', please detail the information.**

   The Announcement pertained to sales results and earnings guidance in relation to BIO for the full financial year ended 30 June 2025. The Company considers information of this nature to be material to the assessment by investors and their professional advisers of the assets and liabilities, financial position and performance, profits and losses and prospects of BIO, and therefore, information that investors and their professional advisers would expect to find in a disclosure document, if a disclosure document was required.

6. **If the answer to either 1.4 or 1.5 is 'yes', when did BIO first become aware of the relevant information in the Announcement? In answering this question, please specify the date and time when BIO first became aware of the relevant information, and in particular, monthly sales in June of ~$2.1 million, up 50% vs PCP.'**

   BIO first became aware of the information disclosed in the Announcement at 5.41pm EST on 30 June 2025.

   Consistent with prior reporting periods, BIO finalises its sales results and earnings guidance only after the close of business on the last day of the relevant period. BIO has a process in place to collate all sales information before providing a final sales tally to the Board, as sales on the last day of the month can be unpredictable. This process requires all sales orders received up to and including the last day of the relevant month to be recorded in our system, fulfilled by the BIO warehouse and reviewed before invoices are approved. With 30 June 2025 being a Monday and the last day of the financial year, we could not confirm a final sales figure for the month until 5.30pm EST on 30 June 2025, when all orders were processed. This information was processed and finalised by the CFO promptly and without delay at 5.41pm EST on 30 June 2025, and therefore BIO first became aware of this information and a draft of the Announcement was provided to the Board at 5.41pm EST on 30 June 2025.

   Given the price sensitivity of the information contained in the draft ASX Announcement and in line with ASX guidance, the draft Announcement was presented to the full BIO Board for review, comment and approval before release.

   The Board considered and approved the contents of the draft Announcement by 9.10pm EST on 30 June 2025 (being less than 4 hours after becoming aware of the relevant information), which was immediately provided to the Company Secretary and prepared for release to market. The final version of the Announcement was lodged and was released on MAPS immediately the following day at 8.44am EST on 1 July 2025, before commencement of trading.

7. If BIO first became aware of the relevant information before lodging the Cleansing Notice on MAP, was BIO relying on the provisions of Listing Rule 3.1A not to release the information before BIO lodged the Announcement on MAP?

No, BIO was not aware of the information the subject of the draft Announcement prior to lodging its Cleansing Notice dated 30 June 2025 (the '**Cleansing Notice**') and was not relying on any of the provisions of ASX Listing Rule 3.1A to withhold the information before BIO lodged the Announcement on MAP. For the reasons outlined in our response to question 6 above, the Company did not have the final sales results and earnings guidance to provide at the time of release of the Cleansing Notice and therefore did not have reasonable grounds to disclose the information contained in the Announcement at that time.

At the time of release of the Cleansing Notice, BIO's projected sales figures for the full financial year ending 30 June 2025 (**FY25**) was consistent with the information that had already been disclosed to the market by the Company, and therefore, the Board did not consider that there was any new materially price-sensitive information to disclose.

Notably, prior to the release of the Cleansing Notice, BIO had:

- reported sales revenue in Q1, Q2 and Q3 of $4.25M, $4.61M and $4.51M respectively (see Appendices 4C dated 24 October 2024, 20 January 2025 and 28 April 2025), totalling $13.37M;
- indicated to the market that it was *"loo[king] forward to our Q4 results, historically our strongest seasonal growth period of the year. … The growth through the first nine months represents 46% increases vs PCP"* (see announcement dated 2 April 2025); and
- announced in its Investor Webinar on 29 May 2025 that Q4 "*will be a record quarter as expected*" (at 4 minutes, 45 seconds).

Research reports and updates released by Bell Potter in respect the Company also consistently forecast the Company's full year revenue for FY25 at $18.9M.

Based on the above, the Board considered that:

- market expectations of BIO's sales performance in Q4 was at least equal to its previous best performing quarter (i.e. at least $4.61M as achieved in Q2); and
- accordingly, market expectations of BIO's full year revenue was between $17.98M and $18.9M.

The sales data available to the Company prior to the release of the Cleansing Notice was consistent with these market expectations. As such, in the opinion of the Board, there was no new materially price-sensitive information to announce as at 30 June pursuant to ASX Listing Rule 3.1. The Company was not relying on any of the provisions of ASX Listing Rule 3.1A to withhold any information at this time.

Only when BIO received final sales data for FY25 at close of trade on 30 June did the Company become aware of new materially price-sensitive information, which the Board verified and approved for announcement promptly without delay in the form of the Announcement on 1 July 2025. The finally announced FY25 sales revenue of $18.4M was at the midpoint of the expected range.

8. **If BIO first became aware of the information prior to the lodging of the Cleansing Notice on MAP, please explain why the information was not set out in the Cleansing Notice pursuant to the Act?**

   BIO was not aware of the information disclosed in the Announcement prior to lodging the Cleansing Notice.

9. **Please confirm that BIO is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.**

   BIO confirms that it is in compliance with the Listing Rules, including Listing Rule 3.1

10. **Please confirm that BIO's responses to the questions above have been authorised and approved in accordance with its published continuous disclosure policy or otherwise by its board or an officer of BIO with delegated authority from the board to respond to ASX on disclosure matters**.

    BIO confirms that its responses to the questions above have been authorised and approved by the board of directors of BIO.

Kind regards

George Lazarou
Company Secretary
Biome Australia Limited

3 July 2025

Reference: 110604

Mr George Lazarou
Company Secretary
Biome Australia Limited
192-194 Johnston Street
Collingwood VIC AU 3066

By email:

Dear Mr Lazarou

Biome Australia Limited ('BIO'): Cleansing Notice Timing

ASX refers to the following:

A. BIO's announcement entitled 'Secondary Trading Notice' released on the ASX Market Announcements Platform ('MAP') at 08:59 am on 30 June 2025 (the 'Cleansing Notice'), disclosing amongst other things:

(a) The Company has complied with the provisions of Chapter 2M of the Act as they apply to the Company, and section 674 of the Act; and

(b) There is no information:

(i) That has been excluded from a continuous disclosure notice in accordance with the ASX Listing Rules; and

(ii) That investors and their professional advisers would reasonably require for the purpose of making an informed assessment of:

A. The assets and liabilities, financial position and performance, profits and losses and prospects of the Company; or

B. *The rights and liabilities attaching to the Shares.*

B. BIO's announcement titled "Biome Achieves Record Sales Revenue" (the 'Announcement') released on MAP at 12:00 pm on 1 July 2025 disclosing the following:

1.1 'Unaudited full-year sales revenue of ~$18.4million for FY25, representing 41% growth versus the previous corresponding period ($13.01m FY24).'

1.1 'Biome recorded its strongest quarter to-date in Q4 FY25, with sales revenue exceeding $5 million, a 33% increase over the previous corresponding period (PCPQ4FY24: $3.78 million).'

1.2 '[R]ecord monthly sales in June of ~$2.1 million, up 50% vs PCP.'

C. Section 708A(7) of the Corporations Act 2001 (Cth) (the 'Act') which states:

For the purposes of subsection (6), excluded information is information:

(a) that has been excluded from a continuous disclosure notice in accordance with the listing rules of the relevant market operator to whom that notice is required to be given; and

(b) that investors and their professional advisers would reasonably require for the purpose of making an informed assessment of:

(i) *the assets and liabilities, financial position and performance, profits and losses and prospects of the body; or*

(ii) *the rights and liabilities attaching to the relevant securities.*

D. The definition of 'aware' in Chapter 19 of the Listing Rules. This definition states that:

> *an entity becomes aware of information if, and as soon as, an officer of the entity (or, in the case of a trust, an officer of the* responsible *entity) has, or ought reasonably to have, come into possession of the information in the course of the performance of their duties as an officer of that entity.*

Additionally, you should refer to section 4.4 in Guidance Note 8 *Continuous Disclosure*: Listing Rules 3.1 – 3.1B 'When does an entity become aware of information?'.

E. Listing Rule 3.1A, which sets out exceptions from the requirement to make immediate disclosure, provided that each of the following are satisfied.

> *3.1A Listing rule 3.1 does not apply to particular information while each of the following is satisfied in relation to the information:*
>
> *3.1A.1 One or more of the following 5 situations applies:*
>
> - *It would be a breach of a law to disclose the information;*
> - *The information concerns an incomplete proposal or negotiation;*
> - *The information comprises matters of supposition or is insufficiently definite to warrant disclosure;*
> - *The information is generated for the internal management purposes of the entity; or*
> - *The information is a trade secret; and*
>
> *3.1A.2 The information is confidential and ASX has not formed the view that the information has ceased to be confidential; and*
>
> *3.1A.3 A reasonable person would not expect the information to be disclosed.*

Request for information

Having regard to the above, ASX asks BIO to respond separately to each of the following questions.

1. Does BIO consider the information disclosed in the Announcement and in particular,

   1.1 'Unaudited full-year sales revenue of ~$18.4million for FY25, representing 41% growth versus the previous corresponding period ($13.01m FY24).'

   1.2 'Biome recorded its strongest quarter to-date in Q4 FY25, with sales revenue exceeding $5 million, a 33% increase over the previous corresponding period (PCPQ4FY24: $3.78 million).'

   1.3 '[R]ecord monthly sales in June of ~$2.1 million, up 50% vs PCP.'

   or any part thereof to be information that investors and their professional advisers would reasonably require for the purpose of making an informed assessment of either:

   1.4 the assets and liabilities, financial position and performance, profits and losses and prospects of BIO; or

   1.5 the rights and liabilities attaching to the relevant securities?

2. If the answer to either 1.4 or 1.5 is 'no', please advise the basis for that view.
3. Does BIO consider the Announcement to include information which is reasonable for investors and their professional advisers to expect to find in a disclosure document?
4. If the answer to question 3 is 'no', please advise the basis for that view.
5. If the answer to question 3 is 'yes', please detail the information.
6. If the answer to either 1.4 or 1.5 is 'yes', when did BIO first become aware of the relevant information in the Announcement? In answering this question, please specify the date and time when BIO first became aware of the relevant information, and in particular,

    6.1 'Unaudited full-year sales revenue of ~$18.4million for FY25, representing 41% growth versus the previous corresponding period ($13.01m FY24).'

    6.2 'Biome recorded its strongest quarter to-date in Q4 FY25, with sales revenue exceeding $5 million, a 33% increase over the previous corresponding period (PCPQ4FY24: $3.78 million).'

    6.3 '[R]ecord monthly sales in June of ~$2.1 million, up 50% vs PCP.'

    or any part thereof.
7. If BIO first became aware of the relevant information before lodging the Cleansing Notice on MAP, was BIO relying on the provisions of Listing Rule 3.1A not to release the information before BIO lodged the Announcement on MAP?
8. If BIO first became aware of the information prior to the lodging of the Cleansing Notice on MAP, please explain why the information was not set out in the Cleansing Notice pursuant to the Act?
9. Please confirm that BIO is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.
10. Please confirm that BIO's responses to the questions above have been authorised and approved in accordance with its published continuous disclosure policy or otherwise by its board or an officer of BIO with delegated authority from the board to respond to ASX on disclosure matters.

When and where to send your response

This request is made under Listing Rule 18.7. Your response is required as soon as reasonably possible and, in any event, by no later than **12:00 pm AEST Tuesday, 8 July 2025**.

You should note that if the information requested by this letter is information required to be given to ASX under Listing Rule 3.1 and it does not fall within the exceptions mentioned in Listing Rule 3.1A, BIO's obligation is to disclose the information 'immediately'. This may require the information to be disclosed before the deadline set out above and may require BIO to request a trading halt immediately if trading in BIO's securities is not already halted or suspended.

Your response should be sent by e-mail to **ListingsComplianceMelbourne@asx.com.au**. It should not be sent directly to the ASX Market Announcements Office. This is to allow us to review your response to confirm that it is in a form appropriate for release to the market, before it is published on the ASX Market Announcements Platform.

Suspension

If you are unable to respond to this letter by the time specified above, ASX will likely suspend trading in BIO's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

In responding to this letter, you should have regard to BIO's obligations under Listing Rules 3.1 and 3.1A and also to Guidance Note 8 *Continuous Disclosure: Listing Rules 3.1 – 3.1B*. It should be noted that BIO's obligation to disclose information under Listing Rule 3.1 is not confined to, nor is it necessarily satisfied by, answering the questions set out in this letter.

Release of correspondence between ASX and entity

We reserve the right to release all or any part of this letter, your reply and any other related correspondence between us to the market under Listing Rule 18.7A. The usual course is for the correspondence to be released to the market.

Yours sincerely

ASX Compliance