

Dear Mr Atkinson

I refer to previous correspondence, including my email below of 21 November 2025. I regret that you have not replied to or acknowledged my requests in that email.

Other shareholders and I are concerned about the issue by the directors of about 200 million shares just before the AGM, whose proxies were used to defeat the will of the existing shareholders, including defeating the restructure of the Board of Directors.

The arrangement under which those shares were issued was never disclosed to the ASX. Accordingly, I am seeking information about that arrangement, beginning with the identity of the "sophisticated investors". However, to date, my efforts have been thwarted.

- The Biotron website lists the top 40 Shareholders. If the directors had updated that list, I could have compared it to previous lists, to identify the new investors. However, the list has not been updated since April 2025.
- On 9 November 2025, I wrote the company secretary, requesting a copy of the share register, to which I'm entitled as a shareholder.
- On 12 November, I received a letter from you indicating that the information I was seeking about the new shareholders could not be provided because of "privacy requirements". You also referred the section of the Corporations Act under which I am entitled to the share register and said it was "subject to the requirements of" the section.
- The only requirement of that section is for me to pay the amount the company requests for supplying the register. However, no such request had been made. Accordingly, I wrote back to you the same evening, 12 November, asking how much Biotron directors wanted me to pay.
- On 17 November, the date of the meeting, I received a reply from you, saying Biotron required \$250, but giving no indication as to how I should pay it.
- On 21 November I sent the email below, asking you how I should pay the sum of \$250. No reply has been received.
- On 26 November, I submitted a request to Computershare for a copy of the share register pursuant to their obligations under the Corporations Act, as the holders of the share register.
- No reply has been received, and the identity of the "sophisticated investors" remains a mystery.

The Directors have now circulated a rights issue. If a substantial number of new shares are issued, the provision to me of the share register will no longer enable me to determine the identity of the "sophisticated investors". It appears that your tactics are to delay my legitimate entitlement to the share register long enough to prevent me from determining that information.

The more efforts you and the directors make to avoid revealing the identity of the "sophisticated investors" and the arrangement under which those shares were issued, the more suspicion you are generating.

If there is anything I have set out above which you or the directors consider to be inaccurate or misleading, please inform me. Please also inform me if there is any reason why this conduct should not be reported to the Australian Stock Exchange.

Yours faithfully

Tim Somerville

Founding Partner

0403 099464



Sydney Office

A Level 10, 32 Walker Street, North Sydney NSW 2060

T (02) 9923 2321

F (02) 9923 2332



Newcastle Office

A Level 1, 17 Bolton Street, Newcastle NSW 2300

T (02) 4927 8077

Liability limited by a scheme approved under Professional Standards Legislation

From: Tim Somerville

Sent: Friday, 21 November 2025 5:07 PM

To: Julian Atkinson <julian@atkinsonlaw.com.au>

Cc: Philip Board <Philip.Board@anu.edu.au>; Peter Scott <me.peterscott@gmail.com>; Jeremy Fisher <Jeremy.Fisher@citicpacificmining.com>; David Castellano <dcastellano15@yahoo.com>; alwestbu@bigpond.net.au; Gail Scott <noblenote00@gmail.com>; Hugh Milner <hugh.milner@gmail.com>

Subject: RE: Biotron Ltd

Dear Mr Atkinson

The ASX required that the deal with SedRX be approved by the Biotron shareholders. The issue of almost 200 million shares prior to the AGM to "sophisticated investors" resulted in the motions to approve that deal appearing to be carried.

I have been taking various steps to ascertain who are those "sophisticated investors", their connection to SedRX, and the arrangement relating to the proxies for the recent AGM attaching to those shares.

Your letter received at 9:25 a.m. on the morning of the AGM now appears to acknowledge your client's obligations to provide a copy of the share register and no longer hides behind "privacy" but insists on payment of \$250. Please inform me of the bank account which I should transfer that money.

I assume this is an attempt to discourage me from finding out the identity of the "sophisticated investors". The more difficulties you and the directors impose to prevent the provision of that information, the more suspicion you are creating.

Accordingly, I again ask that I be informed of the identity of those "sophisticated investors", without the formality of obtaining the share register. However, if your client is not prepared to provide that information informally, please ensure prompt compliance with the requirements of the Corporations Act, once the \$250 are paid.

Yours faithfully

Tim Somerville

Founding Partner

0403 099464



Sydney Office

A Level 10, 32 Walker Street, North Sydney NSW 2060

T (02) 9923 2321

F (02) 9923 2332



Newcastle Office

A Level 1, 17 Bolton Street, Newcastle NSW 2300

T (02) 4927 8077

Liability limited by a scheme approved under Professional Standards Legislation

From: Julian Atkinson <julian@atkinsonlaw.com.au>

Sent: Monday, 17 November 2025 9:25 AM

To: Tim Somerville <TSomerville@somervillelegal.com.au>

Cc: Philip Board <Philip.Board@anu.edu.au>; Peter Scott <me.peterscott@gmail.com>; Jeremy Fisher <Jeremy.Fisher@citicpacificmining.com>; David Castellano <dcastellano15@yahoo.com>; alwestbu@bigpond.net.au; Gail Scott <noblenote00@gmail.com>; Hugh Milner <hugh.milner@gmail.com>

Subject: RE: Biotron Ltd

Dear Mr Somerville

Please see the attached letter.

Kind regards

Julian Atkinson
Principal
Atkinson Corporate Lawyers
+61 417 264 845

This document and any attachments are confidential, and may be the subject of legal professional privilege and copyright. If you are not the intended recipient you must not disclose or use the

information contained in it. If you have received this email in error, please notify us immediately and delete it.

From: Tim Somerville <TSomerville@somervillelegal.com.au>

Sent: Wednesday, 12 November 2025 7:32 PM

To: Julian Atkinson <julian@atkinsonlaw.com.au>

Cc: Philip Board <Philip.Board@anu.edu.au>; Peter Scott <me.peterscott@gmail.com>; Jeremy Fisher <Jeremy.Fisher@citicpacificmining.com>; David Castellano <dcastellano15@yahoo.com>; alwestbu@bigpond.net.au; Gail Scott <noblenote00@gmail.com>; Hugh Milner <hugh.milner@gmail.com>

Subject: Biotron Ltd

Dear Mr Atkinson

Please see attached.

Kind regards

Tim Somerville
Solicitor
Somerville Legal
Level 10, 32 Walker Street
North Sydney NSW 2060
(02) 9923 2321

www.somervillelegal.com.au

Liability limited by a scheme approved under Professional Standards Legislation