

## Disclosure of beginning to have substantial holding

*Section 276, Financial Markets Conduct Act 2013*

**To NZX Limited**

and

**To Locate Technologies Limited**

Date this disclosure made: 18 December 2025

Date on which substantial holding began: 17 December 2025

### **Substantial product holder(s) giving disclosure**

Full name(s): Steve Orenstein through his associated entities: SMO Funds Pty Limited, SMO Money Tree Pty Ltd, SMO SMSF Pty Ltd and Gemlode Pty Ltd.

### **Summary of substantial holding**

Class of quoted voting products: ordinary shares

Summary for Steve Orenstein and associated entities

For this disclosure,—

- (a) total number held in class: 49,310,283
- (b) total in class: 297,643,833
- (c) total percentage held in class: 16.567%

### **Details of relevant interests**

Details for Steve Orenstein and associated entities

Nature of relevant interest(s): Indirect relevant interest through controlled entities

For that relevant interest,—

- (a) number held in class: 49,310,283
- (b) percentage held in class: 16.567%
- (c) current registered holder(s): SMO Funds Pty Limited, SMO Money Tree Pty Ltd, SMO SMSF Pty Ltd and Gemlode Pty Ltd.
- (d) registered holder(s) once transfers are registered: not applicable

For a derivative relevant interest, also—

- (a) type of derivative: N/A
- (b) details of derivative: N/A
- (c) if the substantial product holder is not a party to the derivative, the nature of the relevant interest in the derivative:

**Details of transactions and events giving rise to substantial holding**

Details of the transactions or other events requiring disclosure:

A total of 49,310,283 shares are held by Steve Orenstein through his associated entities, SMO Funds Pty Limited, SMO Money Tree Pty Ltd, SMO SMSF Pty Ltd and Gemlode Pty Ltd.

750,000 shares were issued under the initial public offer for total cash consideration of A\$51,000, with the remaining 48,560,283 shares acquired on implementation of the scheme of arrangement.

Additional information

Address(es) of substantial product holder(s): 21 Hill Street Roseville NSW 2069 Australia

Contact details: Steve Orenstein, [steve@locatetech.nz](mailto:steve@locatetech.nz)

**Certification**

I, Steve Orenstein, 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.