

Disclosure of movement of 1% or more in substantial holding
or change in nature of relevant interest, or both

Sections 277 and 278, Financial Markets Conduct Act 2013

Note: This form must be completed in accordance with the instructions at the end of the form.

To NZX

And

To [Gentrack Group Ltd](#)

Relevant event being disclosed: [Change of Substantial Shareholding by 1% or more](#)

Date of relevant event: [10 December 2024](#)

Date this disclosure made: [12 December 2024](#)

Date last disclosure made: [29 October 2024](#)

Substantial product holder(s) giving disclosure

Full name(s): [Regal Funds Management Pty Ltd](#)

Summary of substantial holding

Class of quoted voting products: [Ordinary Shares, ISIN: NZGTKE0002S9](#)

Summary for [Regal Funds Management Pty Ltd](#)

For this disclosure,—

- (a) total number held in class: [7,701,932](#)
- (b) total in class: [107,717,093](#)
- (c) total percentage held in class: [7.150%](#)

For **last** disclosure,—

- (a) total number held in class: [6,223,983](#)
- (b) total in class: [103,494,986](#)
- (c) total percentage held in class: [6.014%](#)

Details of transactions and events giving rise to relevant event

In the period from the last disclosure, as part of normal on-market trading activity Regal Funds Management Pty Limited total buy = 1,637,949 shares (\$ 19,096,930.22 AUD) and total sell = 160,000 (\$ 1,523,100 AUD).

Details of relevant interests

Details for Regal Funds Management Pty Ltd

Nature of relevant interest(s): Relevant interest by virtue of Regal Funds Management Pty Limited having the power to acquire or dispose of financial products in its capacity as trustee and manager of the Regal Atlantic Absolute Return Fund, Regal Tasman Market Neutral Fund, Regal Australian Long Short Equity Fund, Regal Australian Active Extension Trust, Regal No. 3 Fund, Regal Australian Small Companies Fund, Regal Australian Small Companies Trust, Regal Partners Private Fund, Regal Emerging Companies Opportunities Fund, Regal Tactical Opportunities Fund, Regal Emerging Companies Fund III, investment manager for Regal Investment Fund & investment adviser of the Zambezi Absolute Return Fund, Amazon Market Neutral Fund and Regal Absolute Return Master Fund

For that relevant interest,—

- (a) number held in class: 5,794,594
- (b) percentage held in class: 5.379%
- (c) current registered holder(s):

Atlantic Absolute Return Fund (0.212%), (Custodian – UBS Nominees Pty Ltd)
Atlantic Absolute Return Fund (0.113%), (Custodian – Merrill Lynch (Aus) Nominees Pty Ltd)
Atlantic Absolute Return Fund (0.140%), (Custodian – HSBC Custody Nominees (Australia) Limited)
Atlantic Absolute Return Fund (0.110%), (Custodian – J.P. Morgan Prime Nominees Ltd)
Atlantic Absolute Return Fund (0.070%), (Custodian – Citicorp Nominees Pty Ltd)

Regal Tasman Market Neutral Fund (0.113%), (Custodian – Citicorp Nominees Pty Ltd)

Regal Australian Long Short Equity Fund (0.099%), (Custodian – Citicorp Nominees Pty Ltd)

Regal Australian Active Extension Trust (0.375%), (Custodian – UBS Nominees Pty Ltd)

Regal No. 3 Fund (0.042%), (Custodian – UBS Nominees Pty Ltd)
Regal No. 3 Fund (0.054%), (Custodian – HSBC Custody Nominees (Australia) Limited)
Regal No. 3 Fund (0.022%), (Custodian – J.P. Morgan Prime Nominees Ltd)
Regal No. 3 Fund (0.046%), (Custodian – Citicorp Nominees Pty Ltd)

Regal Australian Small Companies Fund (0.772%), (Custodian – UBS Nominees Pty Ltd)
Regal Australian Small Companies Fund (0.090%), (Custodian – J.P. Morgan Prime Nominees Ltd)

Regal Australian Small Companies Trust (0.336%), (Custodian – UBS Nominees Pty Ltd)
Regal Australian Small Companies Trust (0.164%), (J.P. Morgan Prime Nominees Ltd)
Regal Australian Small Companies Trust (0.078%), (Custodian – Citicorp Nominees Pty Ltd)

Regal Investment Fund (0.261%), (Custodian – UBS Nominees Pty Ltd)
Regal Investment Fund (0.065%), (Custodian – HSBC Custody Nominees (Australia) Limited)
Regal Investment Fund (0.064%), (Custodian – J.P. Morgan Prime Nominees Ltd)
Regal Investment Fund (0.091%), (Custodian – Citicorp Nominees Pty Ltd)

Regal Partners Private Fund (0.120%), (Custodian – UBS Nominees Pty Ltd)
Regal Partners Private Fund (0.011%), (Custodian – HSBC Custody Nominees (Australia) Limited A/C 2)
Regal Partners Private Fund (0.007%), (Custodian – J.P. Morgan Prime Nominees Ltd)
Regal Partners Private Fund (0.035%), (Custodian – Citicorp Nominees Pty Ltd)

Regal Emerging Companies Fund III (0.100%), (Custodian – Merrill Lynch (Aus) Nominees Pty Ltd)

Regal Emerging Companies Opportunities Fund (0.856%), (Custodian – UBS Nominees Pty Ltd)

Regal Emerging Companies Opportunities Fund (0.439%), (Custodian – Merrill Lynch (Aus) Nominees Pty Ltd)

Regal Emerging Companies Opportunities Fund (0.020%), (Custodian – J.P. Morgan Prime Nominees Ltd)

Regal Emerging Companies Opportunities Fund (0.067%), (Custodian – Citicorp Nominees Pty Ltd)

Regal Tactical Opportunities Fund (0.165%), (Custodian – UBS Nominees Pty Ltd)

Regal Tactical Opportunities Fund (0.093%), (Custodian – Merrill Lynch (Aus) Nominees Pty Ltd)

Regal Tactical Opportunities Fund (0.046%), (Custodian – HSBC Custody Nominees (Australia) Limited)

Regal Tactical Opportunities Fund (0.075%), (Custodian – J.P. Morgan Prime Nominees Ltd)

Regal Tactical Opportunities Fund (0.027%), (Custodian – Citicorp Nominees Pty Ltd)

Details of relevant interests

Details for Regal Funds Management Pty Limited

Nature of relevant interest(s): derivative relevant interest over quoted underlying.

For that relevant interest,—

- (a) number held in class: 1,907,338
- (b) percentage held in class: 1.771%
- (c) current registered holder(s):

Zambezi Absolute Return Fund (0.358%), (Custodian – UBS Nominees Pty Ltd)

Zambezi Absolute Return Fund (0.169%), (Custodian – Merrill Lynch (Aus) Nominees Pty Ltd)

Zambezi Absolute Return Fund (0.288%), (Custodian – Macquarie Bank Limited)

Zambezi Absolute Return Fund (0.194%), (Custodian – HSBC Custody Nominees (Australia) Limited)

Zambezi Absolute Return Fund (0.158%), (Custodian – J.P. Morgan Prime Nominees Ltd)

Zambezi Absolute Return Fund (0.168%), (Custodian – Citicorp Nominees Pty Ltd)

Regal Absolute Return Master Fund (0.078%), (Custodian – UBS Nominees Pty Ltd)

Regal Absolute Return Master Fund (0.051%), (Custodian – Merrill Lynch (Aus) Nominees Pty Ltd)

Regal Absolute Return Master Fund (0.015%), (Custodian – HSBC Custody Nominees (Australia) Limited)

Regal Absolute Return Master Fund (0.062%), (Custodian – J.P. Morgan Prime Nominees Ltd)

Regal Absolute Return Master Fund (0.029%), (Custodian – Citicorp Nominees Pty Ltd)

Amazon Market Neutral Fund (0.050%), (Custodian – J.P. Morgan Prime Nominees Ltd)

Amazon Market Neutral Fund (0.150%), (Custodian – Citicorp Nominees Pty Ltd)

- (d) registered holder(s) once transfers are registered: Unknown

Details of transactions and events giving rise to substantial holding

Details of the transactions or other events requiring disclosure: (refer attached)

Additional information

Address(es) of substantial product holder(s): [Regal Funds Management Pty Ltd](#)
[Level 47, 1 Macquarie Place, NSW, 2000, Sydney, Australia](#)
Contact details: [Regal Funds Management Pty Ltd](#)
Ph: +61 2 8197 4333
Email: reception@regalfm.com

Name of any other person believed to have given, or believed to be required to give, a disclosure under the Financial Markets Conduct Act 2013 in relation to the financial products to which this disclosure relates: [N/A](#)

Certification

I, [Kenny Ho](#) 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.



Date: 12/12/2024

Kenny Ho
Secretary
Regal Funds Management

Attachment

GTK – Disclosure of movement of 1% or more in substantial Shareholding by Regal Funds Management Pty Limited dated 10/12/2024

Details of Derivative

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|---|--|---|---|
| Parties to the Derivative | UBS Nominees Pty Ltd, Zambezi Absolute Return Fund | UBS Nominees Pty Ltd, Regal Absolute Return Master Fund | Macquarie Bank Limited, Zambezi Absolute Return Fund |
| Notional number of underlying financial products | 385,967 | 84,399 | 310,322 |
| Cash or physical settled | Cash settled swap | Cash settled swap | Cash settled swap |
| Maturity Date | 13 September 2027 | 31 October 2025 | 30 July 2025 |
| Expiry Date | n/a | n/a | n/a |
| Entry price | AUD 9.48 | AUD 8.72 – AUD 9.31 | AUD 8.10 |
| How value of derivative determined by value of the underlying | Mark to market | Mark to market | Mark to market |

| | | | |
|---|---|--|---|
| Parties to the Derivative | J.P. Morgan Prime Nominees Ltd, Zambezi Absolute Return Fund | J.P. Morgan Prime Nominees Ltd, Regal Absolute Return Master Fund | J.P. Morgan Prime Nominees Ltd, Amazon Market Neutral Fund |
| Notional number of underlying financial products | 169,688 | 67,104 | 53,361 |
| Cash or physical settled | Cash settled swap | Cash settled swap | Cash settled swap |
| Maturity Date | 3 November 2025 | 2 January 2026 | 2 January 2026 |
| Expiry Date | n/a | n/a | n/a |
| Entry price | AUD 9.13-11.13 | AUD 9.13-11.13 | AUD 8.98-12.81 |
| How value of derivative determined by value of the underlying | Mark to market | Mark to market | Mark to market |

| | | | |
|---|--|---|---|
| Parties to the Derivative | Merrill Lynch (Aus) Nominees Pty Ltd, Zambezi Absolute Return Fund | Merrill Lynch (Aus) Nominees Pty Ltd, Regal Absolute Return Master Fund | Goldman Sachs International, London, Zambezi Absolute Return Fund |
| Notional number of underlying financial products | 181,969 | 55,370 | 209,108 |
| Cash or physical settled | Cash settled swap | Cash settled swap | Cash settled swap |
| Maturity Date | 19 October 2026 | 19 October 2026 | 2 March 2029 |
| Expiry Date | n/a | n/a | n/a |
| Entry price | AUD 7.25 – AUD 10.07 | AUD 4.71 – AUD 10.07 | AUD 5.71 |
| How value of derivative determined by value of the underlying | Mark to market | Mark to market | Mark to market |

| | | | |
|---|--|---|--|
| Parties to the Derivative | Goldman Sachs International, London, Regal Absolute Return Master Fund | Citicorp Nominees Pty Ltd, Zambezi Absolute Return Fund | Citicorp Nominees Pty Ltd, Regal Absolute Return Master Fund |
| Notional number of underlying financial products | 16,569 | 180,900 | 30,711 |
| Cash or physical settled | Cash settled swap | Cash settled swap | Cash settled swap |
| Maturity Date | 11 April 2029 | 4 October 2027 | 4 October 2027 |
| Expiry Date | n/a | n/a | n/a |
| Entry price | AUD 8.41 | AUD 11.84-12.76 | AUD 11.84-12.76 |
| How value of derivative determined by value of the underlying | Mark to market | Mark to market | Mark to market |

| | |
|---|---|
| Parties to the Derivative | Citicorp Nominees Pty Ltd, Amazon Market Neutral Fund |
| Notional number of underlying financial products | 161,960 |
| Cash or physical settled | Cash settled swap |
| Maturity Date | 4 October 2027 |
| Expiry Date | n/a |
| Entry price | AUD 11.84 |
| How value of derivative determined by value of the underlying | Mark to market |