17 April 2026

ASX Compliance
Level 24, 39 Martin Place
Sydney NSW 2000

Email to: ListingsComplianceSydney@asx.com.au

Dear ASX Compliance,

RESPONSE TO AWARE LETTER

Atomo Diagnostics Ltd ("**AT1**" or "the **Company**") refers to ASX's letter dated 9 April 2026 ("**ASX Letter**").

Unless otherwise defined, capitalised terms used in this letter have the meanings given to them in the ASX Letter.

Background

By way of background, AT1 provides the following context, details of which have been previously disclosed in prior market announcements:

- The Company is the exclusive licensor, manufacturer and supplier of Pascal cassettes to Lumos Diagnostics Holdings Ltd (ASX:LDX) ("**Lumos**") for its rapid, point-of-care testing product, FebriDx®.

- Lumos previously announced a ~US$300m supply contract for FebriDx® in the United States contingent on CLIA waiver approval ("**Phase Agreement**"). Given the significance of the CLIA waiver to the Phase Agreement and the anticipated increase in demand for Atomo's Pascal cassette, the Company has continually kept the market informed as to the status of Lumos' CLIA waiver application. Most recently, in its Appendix 4D and Half Year Report for FY26 (for the period ended 31 December 2025), the Company noted Lumos' positive engagement with the US FDA on the FebriDx CLIA waiver submission and that Lumos anticipated a decision on its waiver application during Q3 FY26.

- On 25 March 2026, Lumos requested and was granted a trading halt, pending an announcement regarding the FDA's response to its FebriDx CLIA waiver application ("**LDX Trading Halt**").

- On 27 March 2026, prior to market open, Lumos released its announcement confirming that the FebriDx® test had received CLIA waiver approval from the FDA ("**LDX Waiver Approval Announcement**").

- Prior to the commencement of trading on 30 March 2026, the Company released its own market announcement reiterating the outcome of the CLIA waiver application, and separately announced the outcome of a placement completed over the intervening weekend.

Responses

The Company provides the following responses to the queries in the ASX Letter.

Question 1

Yes. The Company considers the Announcement contained information that a reasonable person would expect to have a material effect on the price or value of its securities.

However, out the outset, the Company wishes to draw an important distinction between:

- the information contained in the Announcement released on 30 March 2026, which the Company considers was market sensitive; and

- the Preliminary Correspondence received on 25 March 2026 (referred to in the response to Question 3 below), which was high level, lacked substantive detail and did not, in the Company's view, constitute information that a reasonable person would expect to have a material effect on the price or value of AT1 securities at that time.

The Company's position on the application of Listing Rule 3.1 is set out in further detail in the response to Question 3 below.

Question 2

As indicated in the response to Question 1, the Company's emphatic position is that it was not in possession of disclosable information until Lumos made its LDX Waiver Approval Announcement pre-market on 27 March 2026.

The AT1 Trading Halt was sought as a precautionary measure, not in response to a disclosure obligation the Company considered had been triggered. Given that clarity on the CLIA waiver outcome was likely to enter the public domain in the near term, as indicated by Lumos' request for the LDX Trading Halt, the halt was a prudent step taken to avoid the risk of a false market rather than an acknowledgment that the Company held disclosable information.

Question 3

The Company first became aware of the information referred to in Question 1 on 27 March 2026, upon public release of the LDX Waiver Approval Announcement by Lumos prior to market open. It was at that point, and not before, that the Company became aware of information that was, or could reasonably be expected to be, material to the price or value of its securities for the purposes of Listing Rule 3.1.

The following chronology sets out the key events between 25 and 30 March 2026 and demonstrates, clearly and unambiguously, that the Company was not in possession of such information at any point prior to that announcement, and that its actions throughout that period, including the decision to seek the AT1 Trading Halt, were at all times consistent with its obligations under Listing Rule 3.1.

1. 25 March 2026 – Preliminary Correspondence

During the afternoon of 25 March 2026, following the grant of the LDX Trading Halt, the Company's Managing Director received an email from Lumos at 3:54pm ("**Preliminary Correspondence**") and seen after 4.00pm, that suggested a potentially positive outcome in relation to the CLIA waiver application.

(a) Primary position – LR 3.1 was not triggered

The Company's primary and unequivocal position is that the Preliminary Correspondence did not trigger a disclosure obligation under Listing Rule 3.1.

The Preliminary Correspondence was general in nature and did not contain any substantive or verifiable detail as to the status or conditions of any waiver approval or its commercial implications for AT1. Having regard to section 4.4 of ASX Guidance Note 8, which recognises that an entity receiving information in instalments will not be in a position to make a disclosure determination until more complete information is available, the Company could not reasonably form a view as to whether the Preliminary Correspondence was price sensitive until the substantive terms and conditions of any waiver approval were known. Announcing the vague contents of the Preliminary Correspondence in isolation, absent those details, would have risked being misleading and creating a false market in the Company's securities. If it subsequently transpired that the outcome was less positive than initially suggested, whether due to conditionality or otherwise, any premature announcement could have caused real harm to the market. Accordingly, no disclosure obligation arose upon receipt of the Preliminary Correspondence.

(b) Alternative position – LR 3.1A applied in any event

Without conceding that Listing Rule 3.1 was triggered, and in the event that ASX considers the Preliminary Correspondence to have constituted market sensitive information, the Company's alternative position is that each of the conditions in Listing Rule 3.1A was independently satisfied at that time, such that no immediate disclosure obligation arose in any event:

- **LR 3.1A.1**: The Preliminary Correspondence comprised matters of supposition and was insufficiently definite to warrant disclosure.
- **LR 3.1A.2**: The information was confidential. The Company had not formed the view, nor did it have any basis to consider, that the information had ceased to be confidential at that time.
- **LR 3.1A.3**: A reasonable person would not have expected the information to be disclosed in that form, given its preliminary and unverified nature.

2. 26 March 2026 – Trading Halt (9:41 am)

On 26 March 2026, the Company proactively requested a trading halt prior to market open.

As set out in the response to Question 2, the request was a precautionary measure to safeguard market integrity. It was not acknowledgement that a disclosure obligation had been triggered. The

Company acted prudently in circumstances where it had received an ASX price query the prior day regarding unexplained movements in trading volume, and where clarity on the CLIA waiver outcome was likely to enter the public domain in the near term upon lifting of the LDX Trading Halt.

3. 27 March 2026 – LDX Waiver Approval Announcement (prior to market open)

The LDX Waiver Approval Announcement was released prior to market open on 27 March 2026. Unlike the Preliminary Correspondence, the LDX Waiver Approval Announcement confirmed the outcome of the CLIA waiver application in substance and with all specific details, including the applicability of any relevant terms and conditions of the FDA's approval that had been absent from the Preliminary Correspondence. The Company considers that this is the point at which it first became *aware* of information relevant to its own disclosure obligations, being the point at which the outcome was confirmed in the public domain with sufficient detail to enable the Company to properly assess its commercial implications for its own business

Question 4

1. Disclosure obligation *prior* to 27 March 2026

To reiterate, no announcement was made prior to the LDX Waiver Approval Announcement on 27 March 2026 because the Company did not consider that it held disclosable information before that time. Refer to the reasons set out above.

2. Disclosure obligation on 27 March 2026 and steps taken to discharge it

As noted above, the Company considers its disclosure obligation under Listing Rule 3.1 in respect of the waiver outcome to have arisen on 27 March 2026. At that time, the Company was already in a valid trading halt. The Company acknowledges that a trading halt does not suspend the operation of the Listing Rules, and has considered whether it was required to release an announcement regarding the waiver outcome following the LDX Waiver Approval Announcement.

The Company's view is that no such announcement was required on 27 March 2026, for the following reasons:

- First, the market was not trading on an uninformed basis. The Company was in a valid halt and no AT1 securities were being traded. The purpose of the immediate disclosure obligation in Listing Rule 3.1 is to ensure that the market is informed before trading occurs on a price sensitive basis, and that purpose was being served by the halt.

- Second, if the Company had not already been in a trading halt, it would have been entitled, and would have elected, to request one rather than make an immediate announcement. The relevant information originated from a third party, had an indirect impact on the Company's business, and the commercial implications for AT1 were continuing to evolve in the context of a developing capital raise. ASX Guidance Note 8 is clear that where an entity is not in a position to make a complete and accurate announcement without delay, the appropriate course is to seek a trading halt. Releasing an incomplete or insufficiently considered announcement in those circumstances would itself have risked creating a false market. The Company was entitled to use the halt period to properly assess those implications before making a disclosure, and that is precisely what it did.

- Third, the waiver outcome was already in the public domain by virtue of the LDX Waiver Approval Announcement. There was no information asymmetry in the market requiring immediate correction.

The Company therefore released a comprehensive announcements before trading recommenced on 30 March 2026, once it had sufficient clarity on both the commercial implications of the waiver outcome and the outcome of the placement. The Company's position is that this approach discharged its obligations under Listing Rule 3.1 promptly and in full, and is consistent with the principles in ASX Guidance Note 8 regarding the release of accurate and complete information.

Question 5

1. Prior to the LDX Waiver Approval Announcement (26 March 2026)

Following its request for a trading halt on 26 March 2026, the Company held a preliminary discussion with potential brokers commencing at approximately 10:30am. No confidential or market sensitive information was disclosed during this discussion. The discussion was limited to general observations, including that a confirmed CLIA waiver outcome may generate investor interest in the Company's securities.

2. After the LDX Waiver Approval Announcement (27 March 2026 onwards):

Once the LDX Waiver Approval Announcement was released and its contents had entered the public domain, discussions with the brokers progressed to include the outcome of the CLIA waiver application. By that time, the relevant information was publicly available and had been in the public domain for a period sufficient for market dissemination and absorption.

Question 6

The Company considers it complied with Listing Rule 15.7. At no time did the Company disclose information for release to the market to the joint lead managers or placement participants prior to that information becoming freely available within the public domain.

The waiver outcome discussed with brokers from 27 March 2026 onwards was, at that point, already in the public domain by virtue of the LDX Waiver Approval Announcement. Information that is already publicly available is not information for release to the market for the purposes of Listing Rule 15.7, as it is not information that the Company is required to give to ASX under Listing Rule 3.1. This is consistent with paragraph 4.3 of ASX Guidance Note 8, which recognises that the assessment of whether information is market sensitive must be made in context, having regard to the prevailing circumstances, including any external information that is publicly available at the relevant time.

The Company further notes that, while it was continuing to assess the implications of the waiver outcome for its own business during this period (as described in the response to Question 4 above), after careful consideration it ultimately formed the view that those implications were consistent with the Company's expectations and its previous market announcements. In that context, no additional information was

shared with brokers that was not already in the public domain, and the Company's Announcement on 30 March 2026 concerning the waiver was confirmatory in nature, rather than constituting new information.

The Company elected to proceed with its own announcement regarding the outcome of the CLIA waiver in any event, primarily to ensure that any on-sale restrictions applicable to securities issued under the Placement would be determined by reference to a cleansing notice supported by the Company's own market release, rather than relying solely on the LDX Waiver Approval Announcement.

Question 7

Provided as requested, enclosed and not for release to market.

Question 8

Provided as requested, enclosed and not for release to market.

Question 9

At the time of requesting the AT1 Trading Halt on the morning of 26 March 2026, the Company had no basis upon which to anticipate that a capital raising would proceed. The Board had not resolved to proceed with any capital raise, no brokers had been mandated and no terms (including quantum, pricing or offer structure) had been determined. It was therefore not appropriate to reference a capital raising in the trading halt request, and the stated purpose of the halt, being to enable the Company to update the market on the FDA response to Lumos' CLIA waiver application, accurately reflected what the Company anticipated it may need to address once the CLIA waiver outcome entered the public domain.

The capital raising was a consequence of the CLIA waiver outcome becoming public, not a pre-existing plan. The decision to pursue a placement arose only after the LDX Waiver Approval Announcement entered the public domain and the Board had assessed its commercial implications. By the time a placement was determined to be appropriate, the Company was already in a valid trading halt and binding commitments were not received until the following weekend.

The timeline from the broker discussions held on 26 March 2026 through to completion of the Placement is set out below:

1. **25 March 2026 (afternoon)**

   The Company received the Preliminary Correspondence from Lumos at 3:54pm. No decision was made regarding any capital raising.

2. **26 March 2026 (morning)**

   The Company requested the AT1 Trading Halt at 9:41am. Following the halt, the Company held a preliminary discussion with potential brokers from approximately 10:30am, limited to general observations regarding potential investor interest. No confidential or price sensitive information was disclosed and no mandate was agreed. Further discussions were held in the late afternoon and early evening regarding potential mandate terms but no mandate was executed.

3. **27 March 2026 (prior to market open)**

   Lumos released the LDX Waiver Approval Announcement. The CLIA waiver outcome entered the public domain.

4. **27 March 2026 (morning)**

   Discussions with brokers recommenced in earnest, now incorporating the publicly available waiver outcome. The Board resolved to proceed with a capital raising and a broker mandate was executed at 12:20pm.

5. **28–29 March 2026 (weekend)**

   The bookbuild was conducted. Binding commitments under the Placement were received on 29 March 2026. Draft announcement copies were provided to the brokers at 12:00pm on 29 March 2026 following confirmation of firm commitments.

6. **30 March 2026 (prior to market open)**

   The Company released the Announcement and the Placement announcement on its MAP, and the AT1 Trading Halt was lifted. Trading recommenced with the market fully informed.

The Company notes that at no point during the AT1 Trading Halt was the market trading on an uninformed basis in relation to any price sensitive information held by AT1. The placement was executed during a period of valid halt, binding commitments were obtained over the weekend when the market was not open, and both announcements were released before trading resumed. The Company considers that its conduct throughout is consistent with the proper operation of the trading halt mechanism and the principles underlying Listing Rule 3.1.

Question 10

The Company confirms that it is in compliance with the Listing Rules and in particular Listing Rule 3.1.

Question 11

The Company confirms that its responses to the questions above have been authorised and approved by the Board in accordance with the Company's continuous disclosure policy.

Please contact me if you require any further information concerning this matter.

Yours sincerely,

Mathew Watkins
Company Secretary

9 April 2026

Mr Mathew Watkins
Communication Person
Atomo Diagnostics Limited
PO Box 785
WAVERLEY NSW 2024

By email

Dear Mr Watkins

Atomo Diagnostics Limited ('AT1'): ASX Aware Letter

ASX refers to the following:

A. AT1's 'Request for Trading Halt' released on the ASX Market Announcements Platform ('**MAP**') on 26 March 2026 disclosing the following:

The trading halt is requested to enable the Company to update the market on the FDA response to the FebriDx® CLIA waiver application submitted by Lumos Diagnostics Holdings Ltd (ASX: LDX). As previously disclosed to the market, the Company is the exclusive licensor, manufacturer and supplier of Pascal cassettes to LDX for FebriDx® of which the FDA decision will materially impact the volume of sales of the FebriDx® test, each of which requires the Company's Pascal cassette (stated purpose).

B. AT1's announcement titled 'FebriDx FDA CLIA wavier approval unlocks upside for Pascal' (the '**Announcement**'), released on MAP on 30 March 2026, which stated (relevantly):

Atomo Diagnostics Limited (ASX:AT1) (Atomo) is pleased to note that Lumos Diagnostics (ASX:LDX) FebriDx® test has received CLIA waiver approval from the US Food and Drug Administration (FDA). FebriDx® has been exclusively commercialised in Atomo's patented Pascal cassette to deliver improved usability and reliability in the hands of untrained users, with the performance of Pascal playing a pivotal role.

C. AT1's announcement titled 'Atomo Completes Capital Raise' (the '**Placement**'), released on MAP on 30 March 2026 which stated (relevantly):

The Company is undertaking a capital raising to raise up to $4.0 million, by way of a placement to raise $3.0 million ("Placement") and a Share Purchase Plan ("SPP") to raise up to $1.0 million (together known as "Capital Raising"). The Company has received binding commitments for $3.0 million under the Placement.

The Placement will result in the issuance of approximately 90.9 million new fully paid ordinary shares ("Shares") at an issue price of $0.033 (3.3 cents) per share with 45.5 million free attaching options, exercisable at $0.045 (4.5 cents) expiring 2.5 years from the date of issue, on the basis of one option for every two new shares subscribed for and issued ("Options"). The issue price of $0.033 represents a ~10% discount to the 15-day VWAP of $0.0368.

…

The Placement was undertaken by the Company with Joint Lead Managers Alpine Capital Pty Ltd and GBA Capital Pty Ltd ("JLM's"). The JLM's will receive a 6% broker fee on all funds raised in addition to 5 million Broker Options to be issued on the same terms as the Placement and SPP free attaching options. Bay Financial Pty Ltd acted as Co-Manager.

D. The change in the price of AT1's securities from $0.035 immediately prior to the release of the Announcement to a low of $0.031 following the release of the Announcement.

E. Listing Rule 3.1, which requires a listed entity to immediately give ASX any information concerning it that a reasonable person would expect to have a material effect on the price or value of the entity's securities.

F. The definition of "aware" in Chapter 19 of the Listing Rules, which 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.

G. Section 4.4 in *Guidance Note 8 Continuous Disclosure: Listing Rules 3.1 – 3.1B* titled "When does an entity become aware of information?"

H. Listing Rule 3.1A, which sets out exceptions from the requirement to make immediate disclosure as follows.

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.

I. The concept of 'confidentiality' detailed in section 5.8 of Guidance Note 8 *Continuous Disclosure: Listing Rules 3.1 – 3.1B*. In particular, the Guidance Note states that:

Whether information has the quality of being confidential is a question of fact, not one of the intention or desire of the entity. Accordingly, even though an entity may consider information to be confidential and its disclosure to be a breach of confidence, if it is in fact disclosed by those who know it, then it is no longer a secret and it ceases to be confidential information for the purposes of this rule.

J. Listing Rule 15.7 which states (relevantly):

An entity must not release information that is for release to the market to any person until it has given the information to ASX and has received an acknowledgement that ASX has released the information to the market.

Request for information

Having regard to the above, ASX asks AT1 to respond separately to each of the following questions:

1. Does AT1 consider the Announcement contained information that a reasonable person would expect to have a material effect on the price or value of its securities?
2. If the answer to question 1 is "no", please advise the basis for that view, commenting specifically on why AT1 requested a trading halt for the purposes of preparing and releasing the Announcement.

3. When did AT1 first become aware of the information referred to in question 1 above? In your answer, please provide the specific date and time.

4. If AT1 first became aware of the information referred to in question 1 before the date of the Announcement, did AT1 make any announcement prior to that date which disclosed the information? If not, please explain why the information was not released to the market at an earlier time, commenting specifically on when you believe AT1 was obliged to release the information under Listing Rules 3.1 and 3.1A and what steps AT1 took to ensure that the information was released promptly and without delay

5. Did AT1 disclose any of the contents of the Announcement to the joint lead managers to the Placement or any parties who participated in the Placement prior to the publication of that information on MAP?

6. If the answer to question 5 is "yes", does AT1 consider it complied with Listing Rule 15.7? If so, please explain the basis for that view.

7. Please provide a copy of the term sheet and any other materials sent to prospective participants in the Placement (not for release to market).

8. Please provide the list of allottees for the Placement (not for release to market).

9. Please explain why AT1 did not make any reference to raising capital in its trading halt request. In answering this question, please include a timeline from when discussions with the joint lead managers commenced through to completion of the Placement.

10. Please confirm that AT1 is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.

11. Please confirm that AT1'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 AT1 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 **9:00 AM AEST** on **Wednesday, 15 April 2026**.

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, AT1'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 AT1 to request a trading halt immediately if trading in AT1's securities is not already halted or suspended.

Your response should be sent by e-mail to **ListingsComplianceSydney@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 AT1's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

In responding to this letter, you should have regard to AT1'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 AT1'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.

Regards

ASX Compliance