

## Disclosure of beginning to have substantial holding

*Section 276, Financial Markets Conduct Act 2013*

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

**To NZX** Limited  
and

**To** [Gentrack Group Ltd](#)

Date this disclosure made: [14 August 2024](#)

Date on which substantial holding began: [12 August 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: [5,178,174](#)
- (b) total in class: [103,489,369](#)
- (c) total percentage held in class: [5.004%](#)

### **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 Australian Long Short Geared Equity 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, Regal Absolute Return Master Fund.](#)

For that relevant interest,—

- (a) number held in class: [3,608,723](#)
- (b) percentage held in class: [3.487%](#)
- (c) current registered holder(s):

Atlantic Absolute Return Fund (0.114%), (Custodian – J.P. Morgan Prime Nominees Ltd)  
 Atlantic Absolute Return Fund (0.105%), (Custodian – Merrill Lynch (Aus) Nominees Pty Ltd)  
 Atlantic Absolute Return Fund (0.149%), (Custodian – UBS Nominees Pty Ltd)  
 Atlantic Absolute Return Fund (0.208%), (Custodian – HSBC Custody Nominees (Australia) Limited)  
 Regal Tasman Market Neutral Fund (0.037%), (Custodian – UBS Nominees Pty Ltd)  
 Regal Tasman Market Neutral Fund (0.036%), (Custodian – J.P. Morgan Prime Nominees Ltd)  
 Regal Tasman Market Neutral Fund (0.034%), (Custodian – HSBC Custody Nominees (Australia) Limited)  
 Regal Australian Long Short Equity Fund (0.066%), (Custodian – J.P. Morgan Prime Nominees Ltd)  
 Regal Australian Active Extension Trust (0.288%), (Custodian – J.P. Morgan Prime Nominees Ltd)  
 Regal Australian Long Short Geared Equity Fund (0.113%), (Custodian – UBS Nominees Pty Ltd)  
 Regal Australian Long Short Geared Equity Fund (0.023%), (Custodian – J.P. Morgan Prime Nominees Ltd)  
 Regal Australian Long Short Geared Equity Fund (0.056%), (Custodian – HSBC Custody Nominees (Australia) Limited)  
 Regal Australian Small Companies Fund (0.197%), (Custodian – UBS Nominees Pty Ltd)  
 Regal Australian Small Companies Fund (0.094%), (Custodian – J.P. Morgan Prime Nominees Ltd)  
 Regal Australian Small Companies Trust (0.038%), (Custodian – UBS Nominees Pty Ltd)  
 Regal Australian Small Companies Trust (0.214%), (J.P. Morgan Prime Nominees Ltd)  
 Regal Investment Fund (0.139%), (Custodian – UBS Nominees Pty Ltd)  
 Regal Investment Fund (0.068%), (Custodian – HSBC Custody Nominees (Australia) Limited)  
 Regal Investment Fund (0.066%), (Custodian – J.P. Morgan Prime Nominees Ltd)  
 Regal Partners Private Fund (0.006%), (Custodian – J.P. Morgan Prime Nominees Ltd)  
 Regal Partners Private Fund (0.040%), (Custodian – UBS Nominees Pty Ltd)  
 Regal Partners Private Fund (0.011%), (Custodian– HSBC Custody Nominees (Australia) Limited A/C 2)  
 Regal Emerging Companies Opportunities Fund (0.351%), (Custodian – Merrill Lynch (Aus) Nominees Pty Ltd)  
 Regal Emerging Companies Opportunities Fund (0.079%), (Custodian – J.P. Morgan Prime Nominees Ltd)  
 Regal Emerging Companies Opportunities Fund (0.556%), (Custodian – UBS Nominees Pty Ltd)  
 Regal Emerging Companies Fund III (0.093%), (Custodian – Merrill Lynch (Aus) Nominees Pty Ltd)  
 Regal Tactical Opportunities Fund (0.080%), (Custodian – UBS Nominees Pty Ltd)  
 Regal Tactical Opportunities Fund (0.097%), (Custodian – Merrill Lynch (Aus) Nominees Pty Ltd)  
 Regal Tactical Opportunities Fund (0.048%), (Custodian – HSBC Custody Nominees (Australia) Limited)  
 Regal Tactical Opportunities Fund (0.078%), (Custodian – J.P. Morgan Prime Nominees 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: 1,569,451
- (b) percentage held in class: 1.517%

(c) current registered holder(s):

Zambezi Absolute Return Fund (0.259%), (Custodian – UBS Nominees Pty Ltd)  
Zambezi Absolute Return Fund (0.145%), (Custodian – Merrill Lynch (Aus) Nominees Pty Ltd)  
Zambezi Absolute Return Fund (0.271%), (Custodian – Macquarie Bank Limited)  
Zambezi Absolute Return Fund (0.303%), (Custodian – HSBC Custody Nominees (Australia) Limited)  
Zambezi Absolute Return Fund (0.119%), (Custodian – J.P. Morgan Prime Nominees Ltd)  
Regal Absolute Return Master Fund (0.072%), (Custodian – UBS Nominees Pty Ltd)  
Regal Absolute Return Master Fund (0.049%), (Custodian – Merrill Lynch (Aus) Nominees Pty Ltd)  
Regal Absolute Return Master Fund (0.032%), (Custodian – HSBC Custody Nominees (Australia) Limited)  
Regal Absolute Return Master Fund (0.023%), (Custodian – J.P. Morgan Prime Nominees Ltd)  
Amazon Market Neutral Fund (0.120%), (Custodian – UBS Nominees Pty Ltd)  
Amazon Market Neutral Fund (0.124%), (Custodian – J.P. Morgan Prime Nominees 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: [Relevant interest in Gentrack Group Ltd shares arising via on market purchase of shares = 8,991 shares \(\\$83,664.85\).](#)

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](mailto: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: 14/08/2024

Kenny Ho  
Company Secretary  
Regal Funds Management

**Attachment****GTK – Disclosure of beginning to have substantial holding by Regal Funds Management Pty Limited dated 12/08/2024****Details of Derivative**

Parties to the Derivative	UBS Nominees Pty Ltd, Zambezi Absolute Return Fund	UBS Nominees Pty Ltd, Regal Absolute Return Master Fund	UBS Nominees Pty Ltd, Amazon Market Neutral Fund
Notional number of underlying financial products	267,974	74,210	124,661
Cash or physical settled	Cash settled swap	Cash settled swap	Cash settled swap
Maturity Date	23 September 2024	31 October 2025	23 September 2024
Expiry Date	n/a	n/a	n/a
Entry price	AUD 9.00 – AUD 9.35	AUD 8.72 – AUD 9.31	AUD 4.80 – AUD 9
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, Amazon Market Neutral Fund	J.P. Morgan Prime Nominees Ltd, Regal Absolute Return Master Fund
Notional number of underlying financial products	122,666	128,654	23,808
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 7.45	AUD 5.98	AUD 8.72
How value of derivative determined by value of the underlying	Mark to market	Mark to market	Mark to market

Parties to the Derivative	Macquarie Bank Limited, Zambezi Absolute Return Fund	Merrill Lynch (Aus) Nominees Pty Ltd, Zambezi Absolute Return Fund	Merrill Lynch (Aus) Nominees Pty Ltd, Regal Absolute Return Master Fund
Notional number of underlying financial products	280,322	150,044	50,312
Cash or physical settled	Cash settled swap	Cash settled swap	Cash settled swap
Maturity Date	30 July 2025	20 May 2026	20 May 2026
Expiry Date	n/a	n/a	n/a
Entry price	AUD 8.10	AUD 7.25 - AUD 8.66	AUD 4.71 - AUD 8.99
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	Goldman Sachs International, London, Zambezi Absolute Return Fund
Notional number of underlying financial products	33,138	313,662
Cash or physical settled	Cash settled swap	Cash settled swap
Maturity Date	11 April 2029	2 March 2029
Expiry Date	n/a	n/a
Entry price	AUD 8.41	AUD 5.71
How value of derivative determined by value of the underlying	Mark to market	Mark to market