

Form 603

Corporations Act 2001
Section 671B

Notice of initial substantial holder

To Company Name/Scheme **Neurotech International Limited**

ACN/ARSN 610 205 402

1. Details of substantial holder (1)

Name **Biotech Capital Management Pty Ltd as investment manager for the Merchant Biotech Fund (and related entities and associates as described below)**

ACN/ARSN (if applicable) ACN 680 656 553

The holder became a substantial holder on **13 September 2024**

2. Details of voting power

The total number of votes attached to all the voting shares in the company or voting interests in the scheme that the substantial holder or an associate (2) had a relevant interest (3) in on the date the substantial holder became a substantial holder are as follows:

Class of securities (4)	Number of securities	Person's votes (5)	Voting power (6)
Ordinary Shares	54,987,203	54,987,203	5.4% of 1,017,588,587 ordinary shares (NTI)

3. Details of relevant interests

The nature of the relevant interest the substantial holder or an associate had in the following voting securities on the date the substantial holder became a substantial holder are as follows:

Holder of relevant interest	Nature of relevant interest (7)	Class and number of securities
The Trust Company (Australia) Ltd	Custodian for the Merchant Biotech Fund and registered holder of NTI ordinary shares	26,850,255 ordinary shares
Biotech Capital Management Pty Ltd	Investment Manager for the Merchant Biotech Fund (ARSN 654 495 468)	26,850,255 ordinary shares
CIP Licensing Ltd	Responsible Entity for the Merchant Biotech Fund	26,850,255 ordinary shares
Fresh Start Investments Holdings Pty Ltd ('FSIH')	Holder of 80% of the voting shares in Biotech Capital Management Pty Ltd	26,850,255 ordinary shares
Fresh Start Biotech Fund Pty Ltd ('FSBF')	Holder of units in the Merchant Biotech Fund, and 50% owned by a MA Buckley company and 50% owned by a DJ Phillips company	26,850,255 ordinary shares
Fresh Start Australia Pty Ltd ('FSA') and its shareholders (as to 51% and 49%)	Registered holder of ordinary shares	NIL ordinary shares
Matthew Buckley and entities he controls (excluding FSBF and FSIH)	MB Investment Capital Pty Ltd is a shareholder	17,084,226 ordinary shares
Daniel Phillips and entities he controls (excluding FSA, FSBF and FSIH)	DP Investment Capital Pty Ltd and DJ Phillips are shareholders	11,052,722 ordinary shares

4. Details of present registered holders

The persons registered as holders of the securities referred to in paragraph 3 above are as follows:

Holder of relevant interest	Registered holder of securities	Person entitled to be registered as holder (8)	Class and number of securities
The Trust Company (Australia) Ltd. (ABN 21 000 000 993)	The Trust Company (Australia) Ltd.	The Trust Company (Australia) Ltd.	26,850,255 ordinary shares
Matthew Alan Buckley	MB Investment Capital Pty Ltd	n/a	17,084,226 ordinary shares
Daniel James Phillips	DP Investment Capital Pty Ltd and DJ Phillips	n/a	9,000,000 ordinary shares & 2,052,722 ordinary shares (resp.)
Fresh Start Australia Pty Ltd and its two shareholders	Fresh Start Australia Pty Ltd	n/a	NIL ordinary shares

5. Consideration

The consideration paid for each relevant interest referred to in paragraph 3 above, and acquired in the four months prior to the day that

the substantial holder became a substantial holder is as follows:

Holder of relevant interest	Date of acquisition	Consideration (9)		Class and number of securities
		Cash	Non-cash	
n/a	n/a	N/A	N/A	-

The Investment Management Agreement for the Merchant Biotech Fund has been assigned to Biotech Capital Management Pty Ltd (ACN 680 656 553) effective 13 September 2024. The previous Investment Manager was Merchant Funds Management Pty Ltd ACN 638 829 526. CIP Licensing Ltd continues as the R/E of the Fund. Biotech Capital Management Pty Ltd is a corporate authorised representative of Draupner Investment Management Pty Ltd. Fresh Start Biotech Fund Pty Ltd has purchased existing units in the Merchant Biotech Fund.

6. Associates

The reasons the persons named in paragraph 3 above are associates of the substantial holder are as follows:

Name and ACN/ARSN (if applicable)	Nature of association
n/a	Controlling shareholdings, relevant agreements and/or common directors or shareholders

7. Addresses

The addresses of persons named in this form are as follows:

Name	Address
Biotech Capital Management Pty Ltd & Fresh Start Biotech Fund Pty Ltd & MB Investment Capital Pty Ltd	Suite 35, 139 Cardigan St, Carlton Vic 3053
CIP Licensing Ltd	103 Bolsover St, Rockhampton Qld 4700
DP Investment Capital Pty Ltd	22 Winifred Avenue, Umina Beach NSW 2257
Fresh Start Australia Pty Ltd and Fresh Start Investments Holdings Pty Ltd	Suite 35, 139 Cardigan St, Carlton Vic 3053
Merchant Funds Management Pty Ltd (former Investment Manager of the Merchant Biotech Fund)	L1, 441 Stirling Hwy, Cottesloe WA 6909

Signature

print name

Matthew A Buckley

capacity

Director of Biotech Capital Management Pty Ltd

sign here



date 17 September 2024

DIRECTIONS

- (1) If there are a number of substantial holders with similar or related relevant interests (eg. a corporation and its related corporations, or the manager and trustee of an equity trust), the names could be included in an annexure to the form. If the relevant interests of a group of persons are essentially similar, they may be referred to throughout the form as a specifically named group if the membership of each group, with the names and addresses of members is clearly set out in paragraph 7 of the form.
- (2) See the definition of "associate" in section 9 of the Corporations Act 2001.
- (3) See the definition of "relevant interest" in sections 608 and 671 B(7) of the Corporations Act 2001
- (4) The voting shares of a company constitute one class unless divided into separate classes.
- (5) The total number of votes attached to all the voting shares in the company or voting interests in the scheme (if any) that the person or an associate has a relevant interest in.
- (6) The person's votes divided by the total votes in the body corporate or scheme multiplied by 100.
- (7) Include details of.

(a) any relevant agreement or other circumstances by which the relevant interest was acquired. If subsection 671B(4) applies, a copy of any document setting out the terms of any relevant agreement, and a statement by the person giving full and accurate details of any contract, scheme or arrangement, must accompany this form, together with a written statement certifying this contract, scheme or arrangement; and

(b) any qualification of the power of a person to exercise, control the exercise of, or influence the exercise of, the voting powers or disposal of the securities to which the relevant interest relates (indicating clearly the particular securities to

which the qualification applies).

See the definition of "relevant agreement" in section 9 of the Corporations Act 2001.

- (8) If the substantial holder is unable to determine the identity of the person (eg. if the relevant interest arises because of an option) write "unknown".
- (9) Details of the consideration must include any and all benefits, money and other, that any person from whom a relevant interest was acquired has, or may, become entitled to receive in relation to that acquisition. Details must be included even if the benefit is conditional on the happening or not of a contingency. Details must be included of any benefit paid on behalf of the substantial holder or its associate in relation to the acquisitions, even if they are not paid directly to the person from whom the relevant interest was acquired.