

Disclosure of beginning to have substantial holding

*Section 276, Financial Markets Conduct Act 2013*

<b>To</b>	NZX Limited
and	
<b>To</b>	Gentrack Group Limited (GTK)
Date this disclosure made:	26 March 2025
Date on which substantial holding began:	25 March 2025

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

Full name(s):	FirstCape Group Limited & Harbour Asset Management Limited
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**Summary of substantial holding**

Class of quoted voting products:	Ordinary Shares ( <b>Shares</b> )	
Summary for:	FirstCape Group Limited	
For <b>this</b> disclosure -	(a) total number held in class:	5,422,060
	(b) total in class:	107,717,093
	(c) total percentage held in class:	5.034%

Class of quoted voting products:	Ordinary Shares ( <b>Shares</b> )	
Summary for:	Harbour Asset Management Limited	
For <b>this</b> disclosure -	(a) total number held in class:	5,420,560
	(b) total in class:	107,717,093
	(c) total percentage held in class:	5.032%

**Details of relevant interests:**

Nature of relevant interest(s):	Relevant interest in Shares that its wholly-owned subsidiary Harbour Asset Management Limited (Harbour) has a relevant interest in. Harbour has the power to exercise (or control the exercise of) rights to vote attached to, and power to acquire or dispose of (or control the acquisition or disposal of), Shares under investment powers contained in trust deeds or investment management agreements with clients, including BNZ Investments Limited (see below). FirstCape Group Limited has those powers and controls indirectly, as the ultimate owner of Harbour.
Number held in class:	5,420,560
Percentage held in class:	5.032%
Current registered holder of financial products:	For on market purchases: Unknown For on market sales: Various nominees or custodians for and on behalf of Harbour Asset Management Limited
Registered holder of financial products once transfer is registered:	For on market purchases: Various nominees or custodians for and on behalf of Harbour Asset Management Limited For on market sales: Unknown

Nature of relevant interest(s):	Relevant interest in Shares that its wholly-owned subsidiary BNZ Investments Services Limited (BNZIL) has a relevant interest in. BNZIL has a beneficial ownership interest in these shares, which are managed by Harbour under an investment management agreement, so are also included in Harbour's interest referred to above.
Number held in class:	1,195,199
Percentage held in class:	1.110%
Current registered holder of financial products:	For on market purchases: Unknown For on market sales: Various nominees or custodians for and on behalf of Harbour Asset Management Limited
Registered holder of financial products once transfer is registered:	For on market purchases: Various nominees or custodians for and on behalf of Harbour Asset Management Limited For on market sales: Unknown

Nature of relevant interest(s):	Relevant interest in Shares that its wholly-owned subsidiary Jarden Wealth Limited has a relevant interest in. Jarden Wealth Limited has the power to exercise (or control the exercise of) rights to vote attached to, and power to acquire or dispose of (or control the acquisition or disposal of), Shares under the terms of investment management agreements with clients (who are the beneficial owners of the Shares). FirstCape Group Limited has those powers and controls indirectly, as the ultimate owner of Jarden Wealth Limited.
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Number held in class:	1,500
Percentage held in class:	0.001%
Current registered holder of financial products:	For on-market purchases: Unknown For on-market sales: FNZ Custodians Limited
Registered holder of financial products once transfer is registered:	For on-market purchases: FNZ Custodians Limited For on-market sales: Unknown

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

The transactions/events giving rise to this disclosure obligation are on-market buy/sell trades by FirstCape Group Limited and Harbour Asset Management Limited since 25/11/2024 until 25/03/2025, as summarised in the table below.

Details for:	Harbour (including BNZ Investment Services Limited)	BNZ Investment Services Limited (included in Harbour's figures)	Jarden Wealth Limited
On-market purchases – number of shares	782,747	201,508	N/A
On-market purchases – gross consideration	\$8,676,338.80	\$2,294,151.10	N/A
On-market sales – number of shares	241,285	103,015	1,000
On-market sales – gross consideration	\$2,778,675.23	\$1,094,319.73	\$13,300

**Additional information**

Address of substantial product holder:	Level 21, 171 Featherston Street, Wellington
Contact details:	Madeleine Pumphrey M +64 27 376 8309 Madeleine.pumphrey@jbwere.co.nz

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: None.

**Certification**

I, Madeleine Pumphrey, 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.