

**29 September 2025**

Yulia Gurdina  
ASX Compliance  
By email: ListingsComplianceSydney@asx.com.au

Dear Yulia

**OncoSil Medical Limited ('OSL'): Compliance with Listing Rules 3.1 and 15.7 - Query**

We refer to your letter dated 23 September 2025 wherein ASX has asked OSL to respond to certain questions. The Company provides the following responses to ASX's queries:

1. *Does OSL consider the PANCOSIL trial results (refer to paragraph A of this letter), or any part thereof, to be information that a reasonable person would expect to have a material effect on the price or value of its securities?*

Yes

2. *If the answer to any part of question 1 is "no", please advise the basis for that view.*

n/a

3. *When did OSL first become aware of the information referred to in question 1 above?*

The PANCOSIL study is an open-label, single-arm Phase 1-2 feasibility investigator-initiated trial by Amsterdam University Medical Centre (Amsterdam UMC) in the Netherlands.

As noted in OSL's ASX announcement of 5 September 2025, the preliminary results of the PANCOSIL study were presented on Tuesday 16 September 2025 at the Cardiovascular and Interventional Radiological Society of Europe (CIRSE) Annual Congress in Barcelona, Spain.

The oral presentation by Dr Vos from Amsterdam UMC took place on 16 September 2025 at 16:15 GMT+2 (17 September 2025 at 12:15am, Sydney time).

OSL first became aware of the PANCOSIL trial results at the time of the oral presentation by Dr Vos from Amsterdam UMC at the CIRSE 2025 Congress at the date and time mentioned above.

The trial data is collected and owned by Amsterdam UMC, the initiator of the trial. It remained confidential and not available to OSL until the time of the presentation at CIRSE.

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4. *If OSL first became aware of the information referred to in question 1 before the date of the Announcement, did OSL 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 OSL was obliged to release the Information under Listing Rules 3.1 and 3.1A and what steps OSL took to ensure that the Information was released promptly and without delay.*

OSL had no access to the data prior to the presentation at CIRSE. Following receipt of the information, OSL put in place the ASX trading halt pre-open on 17 September 2025 to allow the company to undertake the necessary analysis and interpretation of the results and their meaningfulness to OSL's operating business. This process was undertaken promptly and without delay by the management team and a copy of the draft ASX announcement and investor presentation was then provided to the Board of Directors for approval. The Board approved the release of the ASX announcement on the morning of 18 September 2025 and subsequently requested the ASX remove the trading halt. The announcement was released on the ASX pre-open on 18 September 2025.

5. *It appears that Dr Vos spoke at the Conference (refer to paragraph A of this letter). Please:*  
*5.1. specify when (time and date) Dr Vos presented at the Conference session outlined below;*

16 September 2025 16:15 – 17:15 (GMT+2) in Barcelona, Spain

- 5.2. describe what matters Dr Vos covered at the Conference; and*

Dr Vos presented the first results of the open-label, single-arm phase 1-2 safety and feasibility of CT-guided percutaneous placement of radionuclide therapy (OncoSil™) in patients with unresectable locally advanced pancreatic cancer following induction chemotherapy (PANCOSIL).

The presentation included:

- Current treatments available for pancreatic cancer
- Explanation of the OncoSil™ device and how it is currently administered (endoscopic-ultrasound guidance)
- How the device was administered during the trial (percutaneous CT-guidance)
- Purpose of the trial
- Design of the trial
- PANCOSIL preliminary results
  - Safety 1 – procedure or device related serious adverse events
  - Safety 2 – rate of procedure or device related adverse events grade 3-5: 10% until 90 days
  - Feasibility of the trial, defined as adequate puncture of the tumour and injection of the OncoSil™ device, aiming at tumour ablation: 90%
  - Signals of response that can only be attributed to the OncoSil™ device

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5.3. *provide a copy of any presentation/poster etc. that was used by Dr Vos at the Conference.*

Please see photo images of presentation attached "PANCOSIL PRESENTATION AT CIRSE 2025" from a representative of OSL that was present at the CIRSE meeting.

The presentation content has been provided to the ASX but contractual obligation restricts the actual presentation given at CIRSE being provided to the market.

6. *Does OSL consider that the presentation by Dr Vos at the Conference prior to the Announcement being released on MAP to be compliant with its obligations under Listing Rule 15.7? If so, please explain the basis for this view.*

OSL was not aware what data the presentation would contain – OSL did not review or approve the presentation. OSL was only aware of the date and time of the presentation and as such, were prepared for a trading halt to analyse and interpret the presentation, consider its materiality and if material – to release information to the ASX market (in accordance with its obligations under Listing Rule 15.7).

7. *What arrangements does OSL have in place to ensure compliance with Listing Rule 15.7?*

OSL has an existing Continuous Disclosure Policy and ensures its employees are aware of the Company's obligations under Listing Rule 15.7.

8. *Please confirm that OSL is in compliance with the Listing Rules and, in particular, Listing Rules 3.1 and 15.7.*

Confirmed

9. *Please confirm that OSL'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 OSL with delegated authority from the board to respond to ASX on disclosure matters.*

Confirmed

Yours sincerely

Mr. Tim Luscombe & Mr. David Wood  
Joint Company Secretaries

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23 September 2025

Reference: 112945

Mr Tim Luscombe & Mr David Wood  
Joint Company Secretary  
OncoSil Medical Ltd  
Suite 201 697 Burke Road  
CAMBERWELL VIC 3124

By email

Dear Mr Luscombe

**OncoSil Medical Ltd ('OSL'): Compliance with Listing Rules 3.1 and 15.7**

ASX refers to the following:

- A. OSL's announcement titled 'Positive Preliminary Results from PANCOSIL Phase 1-2 Study' released on the ASX Market Announcements Platform ('MAP') at 9:02 AM AEST on 18 September 2025 (the 'Announcement'), disclosing the following:

*... The PANCOSIL trial results were presented by Dr. Danielle Vos from Amsterdam University Medical Center (Amsterdam UMC) in the Netherlands at the Cardiovascular and Interventional Radiological Society of Europe (CIRSE) 2025 Congress, held 13-17 September 2025 in Barcelona, Spain (the 'Conference').*

- B. 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.

- C. 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.*

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

- E. 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.*

- F. 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.*

- G. Listing Rule 15.7 which states:

*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 acknowledgment that ASX has released the information to the market.*

As the PANCOSIL trial results appear to have been disclosed at the Conference prior to the Announcement being released on MAP, it appears that OSL may have breached Listing Rules 3.1 and/or 15.7.

#### **Request for Information**

Having regard to the above, ASX asks OSL to respond separately to each of the following questions and requests for information:

1. Does OSL consider the PANCOSIL trial results (refer to paragraph A of this letter), or any part thereof, to be 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 any part of question 1 is “no”, please advise the basis for that view.
3. When did OSL first become aware of the information referred to in question 1 above?
4. If OSL first became aware of the information referred to in question 1 before the date of the Announcement, did OSL 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 OSL was obliged to release the Information under Listing Rules 3.1 and 3.1A and what steps OSL took to ensure that the Information was released promptly and without delay.
5. It appears that Dr Vos spoke at the Conference (refer to paragraph A of this letter ). Please:
  - 5.1 specify when (time and date) Dr Vos presented at the Conference;
  - 5.2 describe what matters Dr Vos covered at the Conference; and
  - 5.3 provide a copy of any presentation/poster etc. that was used by Dr Vos at the Conference.
6. Does OSL consider that the presentation by Dr Vos at the Conference prior to the Announcement being released on MAP to be compliant with its obligations under Listing Rule 15.7? If so, please explain the basis for this view.
7. What arrangements does OSL have in place to ensure compliance with Listing Rule 15.7?
8. Please confirm that OSL is in compliance with the Listing Rules and, in particular, Listing Rules 3.1 and 15.7.

- 
9. Please confirm that OSL'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 OSL with delegated authority from the board to respond to ASX on disclosure matters.

ASX expects OSL to make reasonable enquiries to adequately answer the questions above.

#### **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 Friday, 26 September 2025**.

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, OSL'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 OSL to request a trading halt immediately if trading in OSL'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 OSL's securities under Listing Rule 17.3.

#### **Listing Rules 3.1 and 3.1A**

In responding to this letter, you should have regard to OSL'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 OSL'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

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ASX Compliance