

05 November 2025

To: Melissa Kostopoulos, Senior Adviser Listings Compliance, ASX  
 From: Hamish George, Company Secretary, 4DMedical Limited  
 Chris Cox, Interim CFO & Financial Controller, 4DMedical Limited

Dear Melissa,

**Response to 4DMedical Limited ('4DX') Full-year report (audited financial report) query dated 28 October 2025 (ASX ref: ODIN114258)**

We refer to the below responses in relation to your letter dated 28 October 2025:

**1. Please provide details of managements' key assumptions underlying the impairment assessment of intangible assets other than goodwill ('other intangible assets')."**

**Response:**

**Background:** 4DX carried the following intangible assets as at 30 June 2025:

Category	Description	Net Book Value (AUD)
Goodwill	Relates to the Goodwill acquired as part of the acquisition of Imbio Inc in December 2023.	\$42.71m
Software	Largely relates to the software acquired as part of the acquisition of Imbio Inc in December 2023. Shortly after the transaction was completed, McGrathNicol were engaged to provide independent valuation services in relation to the material intangible assets acquired by 4DX as part of the acquisition of Imbio Inc, being best practice when ascertaining the fair value of acquired assets under <i>AASB3 Business Combinations</i> whilst undertaking Purchase Price Allocation accounting. Five separate software assets were identified, being FDA approved AI technology solutions, co-developed screening algorithms and cloud-based imaging platform. 4DX took the mid-point valuation of these assets, with a useful life of 15 years being the expected life of the royalty or revenue stream of the assets.	\$22.28m
Development Costs	These are internally generated, capitalised software assets, in accordance with <i>AASB138 Intangible Assets</i> . Future economic benefits are expected from the costs capitalised and are amortised accordingly over five years.	\$3.66m
Trademarks and patents	Relates to the acquisition costs of 100+ patents and trademarks owned by the Group, typically amortised over 15-20 years representative of the patent life.	\$1.33m
'Other'	Largely relates to Licenses acquired as part of the acquisition of Imbio Inc in December 2023.	\$0.26m

Intangible assets other than goodwill ('other intangible assets') are assessed for any indicators of impairment on a six-monthly basis, or earlier should any indicators arise.

Management's key assumptions underlying impairment assessment of 'other intangible assets' include, but are not limited to:

- Enquiry with internal stakeholders regarding any changes in use or demand of 4DX's software products, potential software obsolescence or market changes impacting customer demand and material changes in which the software is maintained or hosted, etc
- Assessment of the overall economic activity in the key markets in which 4DX operates
- Assessment of any legal, regulatory or geopolitical risks or changes which may adversely affect the carrying value of software
- Consideration of the cashflows generated by the asset, or Management's strategy regarding the future of the asset in question

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- Consideration of any overall technological issues which may affect the carrying value of the asset
- Internal and external review of 4DX's trademark and patents register, ensuring that there are no discontinued assets
- Enquiry with internal stakeholders regarding the carrying value and future economic benefits of higher value trademarks, patents and licenses for 4DX

**"2. Please outline the evidence that was provided to the auditor to support the reasonableness of key assumptions used by management in its impairment assessment of goodwill and other intangible assets."**

**Response:**

4DX provided the following evidence to the auditor in respect to impairment testing:

- Management's internal forecasts representing the Group's cash generating unit, aligned to the FY2026 budget approved by the Board, and the further outlook period from FY2027 to FY2030 based on Management's assumptions and estimates.
- Discounted cashflow (DCF) model based on the above said forecast, with inputs relating to revenue growth, expenditure growth, gross margins, terminal growth rate, WACC, etc.
- Sensitivities applied to the above said DCF which considers the cost-reductions and rationalisation that would occur should revenue levels be lower than forecasted, indicating positive headroom would still be maintained.
- Held discussions with the Board, Management and the auditor to understand the key assumptions underpinning the impairment assessment.
- Provided the auditor with supplementary documentation regarding the key revenue drivers, especially in respect to the outer years in the DCF, in order to substantiate the magnitude, quantum and timing of the revenue flows to be generated through written commitments, signed contracts or recurring/renewing contracts.

**"3. Noting that the auditor issued an unmodified report on 4DX's consolidated financials for the year ended 30 June 2024. Please specify, any changes in assumptions underlying management's impairment assessment of goodwill and other intangibles for the year ended 30 June 2025 compared to the prior period and state the reasons for these changes."**

**Response:**

During FY2024 4DX acquired Imbio on 15 December 2023. As a result of this acquisition there were intangible assets amounting to \$68.9m added to the balance sheet of 4DX. At 30 June 2024, in accordance with *AASB 136 Impairment of Assets paragraph 84*, the initial allocation of goodwill to cash generating units acquired arising from the business combination was not completed before the end of the reporting period in which the acquisition occurred. The goodwill recorded by 4DX was provisional at 30 June 2024 as noted in the disclosure notes (refer note 12) to the financial report and therefore 4DX was not required to assess the provisional goodwill for impairment.

At 30 June 2025 4DX prepared a formal impairment assessment under the requirements of *AASB 136 Impairment of Assets*. A Value In Use model was prepared in the form of a discounted cashflow model to estimate the recoverable amount of the relevant cash generating unit. The forecasts and underpinning assumptions were prepared consistent with the strategic outlook of the business at 30 June 2025 based on 18 months of trading and economic conditions relating to the combined entity (Imbio and 4DX).

**"4. What steps does 4DX intend to take to obtain an unmodified audit opinion with regards to its future financial statements?"**

**Response:**

The nature of the modified audit opinion in the FY25 financial statements related wholly to Management being unable to provide the auditor with "sufficient appropriate audit evidence" regarding the quantum, magnitude and timing of the revenue flows and growth rates which the impairment DCF model is highly sensitive to. Even with Management's sensitised forecast model, the level of revenue required to support the valuation of the cash generating unit is reliant on the achievement of commercial activities that are above and beyond what can be evidenced through firm commitments, signed contracts or historic results at 30 June 2025.

That being said, 4DX intends to continue to take significant commercial strides to support forecasted revenue growth through signed contracts and other sales channels and partnerships. 4DX is committed to obtaining an unqualified audit opinion in future financial statements and intends to engage with the auditor regarding this matter prior to the next audit.



**“5. What enquiries did the Board make of management to satisfy itself that the financial records of 4DX have been properly maintained and that the financial statements comply with the appropriate accounting standards and give a true and fair view of the financial position and performance of 4DX?”**

**Response:**

The Board made enquiries with Management in respect to 4DX’s internal control framework, accounting policies, delegations of authority, accounting system and related controls, segregation of duties and overall management oversight in relation to finance processes. Furthermore, 4DX conducts periodic reviews of its accounting policies and estimates, governance and control framework, and reports material matters to the Board and Audit and Risk Committee.

Lastly, 4DX confirms that the Board received a written declaration from the CEO and CFO (as required by section 295A of the Corporations Act) that:

- The financial records have been properly maintained in accordance with section 286 of the Corporations Act
- The financial statements comply with accounting standards
- The financial statements give a true and fair view of the company’s financial position and performance

**“6. Please confirm that 4DX is complying with the Listing Rules and, in particular, Listing Rule 3.1.”**

**Response:**

Confirmed.

**“7. Please confirm that 4DX’s responses to the questions above have been authorised and approved under its published continuous disclosure policy or otherwise by its board or an officer of 4DX with delegated authority from the board to respond to ASX on disclosure matters.”**

**Response:**

Confirmed.

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28 October 2025

Reference: ODIN114258

Mr Hamish George  
Company Secretary  
4D Medical Limited  
Level 7, 700 Swanston Street  
Carlton, Vic 3053

By email: hamish.george@bio101.com

Dear Mr George

#### **4DMedical Limited ('4DX'): Full-year report (audited financial report) - Query**

ASX refers to the following:

- A. 4DX's Annual Financial Statements for the full year ended 30 June 2025 titled as 'Annual Report' lodged with the ASX Market Announcements Platform ('MAP') and released on 26 September 2025 ('Full-Year Report').
- B. ASX notes that the Independent Auditor's Report attached to the Full-Year Report ('Auditor's Report') contains a qualified opinion ('Qualified Opinion'). The following note is included with respect to the Basis for Qualified Opinion:

*"As set out in Note 13 Intangible Assets, the key assumptions and sensitivities of the Group's Impairment Assessment have been disclosed to support the carrying value of goodwill and other intangible assets as at 30 June 2025. Given the stage of commercialisation of the intellectual property and technology and the level of anticipated revenue and related cash flow forecasts which are yet to be realised, we were unable to obtain sufficient appropriate audit evidence supporting the carrying amount of goodwill and other intangible assets. Consequently, we were unable to determine whether any adjustments to these amounts were necessary."*

- C. 4DX's Corporate Governance Statement for 2025 lodged on the ASX Market Announcements Platform on 26 September 2025 which provides confirmation that 4DX complies with recommendation 4.2 of the ASX Corporate Governance Principles and Recommendations which states:

*"The board of a listed entity should, before it approves the entity's financial statements for a financial period, receive from its CEO and CFO a declaration that, in their opinion, the financial records of the entity have been properly maintained and that the financial statements comply with the appropriate accounting standards and give a true and fair view of the financial position and performance of the entity and that the opinion has been formed on the basis of a sound system of risk management and internal control which is operating effectively."*

- D. Listing Rule 19.11A which states:

*"19.11A If a listing rule requires an entity to give ASX +accounts, the following rules apply.*

- (a) *If the entity controls an entity within the meaning of section 50AA of the Corporations Act or is the holding company of an entity, required by any law, regulation, rule or accounting standard, or if ASX requires, the +accounts must be consolidated +accounts.*
- (b) *The +accounts must be prepared to Australian accounting standards. If the entity is a +foreign entity the +accounts may be prepared to other standards agreed by ASX.*

- (c) *If the listing rule requires audited +accounts, the audit must be conducted in accordance with Australian auditing standards by a registered company auditor. If the entity is a +foreign entity, the audit may be conducted in accordance with other standards agreed by ASX and may be conducted by an overseas equivalent of a registered company auditor.*
- (d) *If the listing rule requires +accounts to be reviewed, the review must be conducted in accordance with Australian auditing standards. If the entity is a +foreign entity, the review may be conducted in accordance with other standards agreed by ASX. Unless the listing rule says an independent accountant may conduct the review, it must be conducted by a registered company auditor (or, if the entity is a +foreign entity, an overseas equivalent of a registered company auditor).*
- (e) *If there is a +directors' declaration that relates to the +accounts, the +directors' declaration must be given to ASX with the +accounts.*
- (f) *If there is a +directors' report that relates to the period covered by the +accounts, the +directors' report must be given to ASX with the +accounts."*

#### **Request for information**

In light of the information contained in the Full-Year Report and the Auditor's Report, and the application of the Listing Rules stated above, please respond to each of the following questions:

1. Please provide details of managements' key assumptions underlying the impairment assessment of intangible assets other than goodwill ('other intangible assets').
2. Please outline the evidence that was provided to the auditor to support the reasonableness of key assumptions used by management in its impairment assessment of goodwill and other intangible assets.
3. Noting that the auditor issued an unmodified report on 4DX's consolidated financials for the year ended 30 June 2024. Please specify, any changes in assumptions underlying management's impairment assessment of goodwill and other intangibles for the year ended 30 June 2025 compared to the prior period and state the reasons for these changes.
4. What steps does 4DX intend to take to obtain an unmodified audit opinion with regards to its future financial statements?
5. What enquiries did the Board make of management to satisfy itself that the financial records of 4DX have been properly maintained and that the financial statements comply with the appropriate accounting standards and give a true and fair view of the financial position and performance of 4DX?
6. Please confirm that 4DX is complying with the Listing Rules and, in particular, Listing Rule 3.1.
7. Please confirm that 4DX's responses to the questions above have been authorised and approved under its published continuous disclosure policy or otherwise by its board or an officer of 4DX 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 **9:30 AM AEDT Wednesday, 5 November 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, 4DX's obligation is to disclose the information 'immediately'. This may require the information to be disclosed before the deadline set out in the previous paragraph and may require 4DX to request a trading halt immediately.

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Your response should be sent to me by e-mail at [ListingsComplianceMelbourne@asx.com.au](mailto:ListingsComplianceMelbourne@asx.com.au). It should not be sent directly to the ASX Market Announcements Office. This is to allow me 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 4DX's securities under Listing Rule 17.3.

**Listing Rules 3.1 and 3.1A**

In responding to this letter, you should have regard to 4DX'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 4DX'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**

ASX reserves 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.

Regards

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ASX Compliance