ASX Announcement
27 December 2025

Appendix 3Y Duncan Bradford – Late Lodgement Notice

Please find attached Appendix 3Y - Change of Director's Interest Notice (**Appendix 3Y Notice**) for Mr Duncan Bradford relating to 135,000 shares acquired on-market in Develop Global Limited (ASX:DVP) (**Develop**).

In relation to the late lodgement of the Appendix 3Y Notice, Develop advises as follows:

1. Details of the changes in shares held by Mr Bradford and reported in the attached Appendix 3Y Notice include:
    a. 81,000 shares acquired on-market on 5 December 2025 for $4.35 per share;
    b. 50,000 shares acquired on-market on 28 November 2025 for $3.60 per share; and
    c. 4,000 shares held indirectly prior to his appointment, which were not included in Mr Bradford's Appendix 3X Initial Directors' Interest Notice dated 14 November 2025, due to an accounting oversight .
2. The acquisition of 131,000 shares on-market was made with written approval on 21 November 2025, in accordance with the Company's Policy for Trading in Company Securities.
3. The Appendix 3Y Notice was not provided to the ASX within 5 business days due to an administrative oversight.
4. Following the discovery of the oversight, steps were immediately taken to verify the necessary disclosures and prepare the relevant notices for release on the ASX. Develop is hereby lodging the attached ASX 3Y Notices now.
5. Develop's Directors are aware of their obligations under ASX Listing Rules 3.19A and 3.19B that require the Company to notify the ASX within 5 business days after the dealing in securities of the Company, which results in a change in the notifiable interest of a Director in the securities of the Company.
6. Develop has a Board approved a Policy for Trading in Company Securities, which includes an obligation on Directors to: (i) notify the General Counsel & Company Secretary of any change in the Director's relevant interest in securities in Develop within 3 business days of after the date of the contract to buy or sell the securities; and (ii) provide the requisite information for the General Counsel & Company Secretary to make the necessary notifications to ASX under the Listing Rules (including Listing Rule 3.19A). This Policy is provided to Directors on induction and at regular intervals.
7. Develop has also entered into written agreements with each of its Directors, which place an obligation on the Directors to notify Develop of changes in the Director's relevant interests in securities in Develop. Following receipt of such notification and information from the Directors, the General Counsel & Company Secretary is required to communicate to the market as soon as possible.
8. Develop has conducted a review of its processes and how they were followed in this instance. Internal procedures have been reviewed and updated as a result of this review. Develop has also implemented, through its Share Registry, Automic Group, a process for monitoring and alerting the General Counsel & Company Secretary and the Chief Financial Officer of any changes to a Director's securities interest in Develop. Develop will also undertake a review of its Policy for Trading in Company Securities.

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9. Develop considers that the late lodgement of Appendix 3Y Notice is a one-off and believes that its current arrangements are adequate to ensure its ongoing compliance with the ASX Listing Rules. Accordingly, Develop does not believe that any further steps are required to ensure future compliance.
10. Develop intends to ensure full and timely compliance with Listing Rule 3.19, going forward.

This Announcement is authorised by the General Counsel and Company Secretary.

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Rule 3.19A.2

Appendix 3Y

Change of Director's Interest Notice

Information or documents not available now must be given to ASX as soon as available. Information and documents given to ASX become ASX's property and may be made public.

Introduced 30/09/01 Amended 01/01/11

Name of entity	**DEVELOP GLOBAL LIMITED**
ABN	**28 122 180 205**

We (the entity) give ASX the following information under listing rule 3.19A.2 and as agent for the director for the purposes of section 205G of the Corporations Act.

Name of Director	**Duncan Bradford**
Date of last notice	14 November 2025

Part 1 - Change of director's relevant interests in securities
In the case of a trust, this includes interests in the trust made available by the responsible entity of the trust.

Note: In the case of a company, interests which come within paragraph (i) of the definition of "notifiable interest of a director" should be disclosed in this part.

Direct or indirect interest	Indirect
Nature of indirect interest (including registered holder) Note: Provide details of the circumstances giving rise to the relevant interest.	Indirect Interest in Shares held by EDGZ Pty Ltd, in which Duncan Bradford is a shareholder and Director.
Date of change	28 November 2025 and 5 December 2025
No. of securities held prior to change	**Registered Holder** / **Ordinary Shares** **Indirect interest:** EDGZ Pty Ltd (ACN 121 725 219) — 4,000 Note: 4,000 shares held indirectly prior to his appointment, which were not included in Mr Bradford's Appendix 3X Initial Directors' Interest Notice dated 14 November 2025, due to an oversight.
Class	Ordinary Shares
Number acquired	131,000
Number disposed	Nil

+ See chapter 19 for defined terms.

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Value/Consideration Note: If consideration is non-cash, provide details and estimated valuation	a) 81,000 shares acquired on-market on 5 December 2025 for $4.35 per share; and b) 50,000 shares acquired on-market on 28 November 2025 for $3.60 per share.
No. of securities held after change	**Registered Holder** / **Ordinary Shares** **Indirect interest:** EDGZ Pty Ltd (ACN 121 725 219) — 135,000
Nature of change Example: on-market trade, off-market trade, exercise of options, issue of securities under dividend reinvestment plan, participation in buy-back	On-Market acquisitions.

Part 2 – Change of director's interests in contracts

Note: In the case of a company, interests which come within paragraph (ii) of the definition of "notifiable interest of a director" should be disclosed in this part.

Detail of contract	Not Applicable
Nature of interest	Not Applicable
Name of registered holder (if issued securities)	Not Applicable
Date of change	Not Applicable
No. and class of securities to which interest related prior to change Note: Details are only required for a contract in relation to which the interest has changed	Not Applicable
Interest acquired	Not Applicable
Interest disposed	Not Applicable
Value/Consideration Note: If consideration is non-cash, provide details and an estimated valuation	Not Applicable
Interest after change	Not Applicable

Part 3 – +Closed period

+ See chapter 19 for defined terms.

Were the interests in the securities or contracts detailed above traded during a +closed period where prior written clearance was required?	No
If so, was prior written clearance provided to allow the trade to proceed during this period?	Not Applicable
If prior written clearance was provided, on what date was this provided?	Not Applicable

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