8 August 2025

ASX Compliance
Level 40, Central Park
152-158 St George's Terrace
Perth WA 6000

By email: sam.dorland@asx.com.au

Dear Sam

Orbital Corporation Limited (ASX: OEC) - Response to ASX Price Query

We refer to your letter dated 8 August 2025 in which you queried the recent trading of Orbital Corporation Limited (the "Company" or "Orbital") shares.

In response to your questions outlined in the letter, we provide the following information:

1. The Company is not aware of any information concerning it that has not been announced to the market which, if known by some in the market, could explain the recent trading in the Company's securities.

2. On 26 May 2025 the Company announced to ASX the appointment of Mr Stephen Pearce as Chief Executive Officer to lead the transition of Orbital from engineering design to a fully integrated manufacturer of propulsion systems and related hardware to the growing tactical Unmanned Aerial Vehicle (UAV) defence sector. Mr Pearce commenced his employment with Orbital on 30 June 2025.

   As part of the Company's continuing focus on global markets for UAV propulsion systems, on 1 August 2025 the Company appointed Mr Steve Osborne as it's new Head of Business Development – US & Europe. Mr Osborne brings more than 30 years of experience across the global defence aerospace sector. His career spans technical support, logistics, training systems, platform sales, and program entry into service – backed by a strong track record in business development across multiple manned and unmanned aircraft types.

3. The Company confirms it is in compliance with the Listing Rules, in particular Listing Rule 3.1.

4. The Company confirms its responses to the above questions have been authorised and approved by an officer with delegated authority by the Board to respond to ASX on disclosure matters.

Yours sincerely

Mark Wege
Company Secretary
(on behalf of the Board of Directors)

8 August 2025

Mr Mark Wege
Company Secretary
Orbital Corporation Limited

By email

Dear Mr Wege

Orbital Corporation Limited ('OEC'): Price - Query

ASX refers to the following:

A. The change in the price of OEC's securities from a low of $0.155 on Thursday 7 August 2025 to a high of $0.25 today.

B. The significant increase in the volume of OEC's securities traded yesterday and today.

Request for information

In light of this, ASX asks OEC to respond separately to each of the following questions and requests for information:

1. Is OEC aware of any information concerning it that has not been announced to the market which, if known by some in the market, could explain the recent trading in its securities?

   If the answer to question 1 is "yes".

   (a) Is OEC relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in OEC's securities would suggest to ASX that such information may have ceased to be confidential and therefore OEC may no longer be able to rely on Listing Rule 3.1A. Accordingly, if the answer to this question is "yes", you need to contact us immediately to discuss the situation.

   (b) Can an announcement be made immediately? Please note, if the answer to this question is "no", you need to contact us immediately to discuss requesting a trading halt (see below).

   (c) If an announcement cannot be made immediately, why not and when is it expected that an announcement will be made?

2. If the answer to question 1 is "no", is there any other explanation that OEC may have for the recent trading in its securities?

3. Please confirm that OEC is complying with the Listing Rules and, in particular, Listing Rule 3.1.

4. Please confirm that OEC'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 OEC 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 **11:15 AM AWST Friday, 8 August 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, OEC'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 OEC to request a trading halt immediately.

Your response should be sent to me by e-mail at **ListingsCompliancePerth@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.

Trading halt

If you are unable to respond to this letter by the time specified above, or if the answer to question 1 is “yes” and an announcement cannot be made immediately, you should discuss with us whether it is appropriate to request a trading halt in OEC’s securities under Listing Rule 17.1. If you wish a trading halt, you must tell us:

- the reasons for the trading halt;
- how long you want the trading halt to last;
- the event you expect to happen that will end the trading halt;
- that you are not aware of any reason why the trading halt should not be granted; and
- any other information necessary to inform the market about the trading halt, or that we ask for.

We require the request for a trading halt to be in writing. The trading halt cannot extend past the commencement of normal trading on the second day after the day on which it is granted. You can find further information about trading halts in Guidance Note 16 *Trading Halts & Voluntary Suspensions*.

Suspension

If you are unable to respond to this letter by the time specified above, ASX will likely suspend trading in OEC’s securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

In responding to this letter, you should have regard to OEC’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 OEC’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.

Kind regards

ASX Compliance