



Code of Business Conduct and Ethics Policy

May 2024

A Message from Our CEO



“A culture of **compliance** cultivates a culture of **integrity**”

Thank you for your dedication to AVITA Medical and building our culture of compliance.

The following Code of Business Conduct & Ethics (the “Code”) outlines AVITA Medical’s compliance policies and procedures. However, developing a culture of compliance means more than simply knowing the Code. We create a culture of compliance by integrating compliance principles into the mosaic of our work. Living by those principles leads to integrity.

In turn, integrity enables us to consistently conduct business honestly and ethically. We do the right thing, the right way, and at the right time, every day. Our culture of compliance is a key component of all that we do.

Thank you for joining me on AVITA Medical’s journey towards even greater success. It all starts with integrity.

Sincerely yours,

*Jim Corbett
Chief Executive Officer*

Our Mission and Values

Our Mission

AVITA Medical's mission is to transform lives through unique and innovative skin regeneration solutions. We act with passion, prize integrity, and value knowledgeable patient-centered collaboration. We provide our customers with safe, effective, and innovative medical devices of the highest quality.

Our Values

Our values provide a strong purpose of what we believe in and are the foundation of everything we do.

- **Patients** are at the heart of everything we do;
- **Employees** are the lifeblood of AVITA Medical;
- **Passion** is key to making a difference at AVITA Medical;
- **Quality** impacts everything we do; and
- **Integrity** is essential to our success.

Table of Contents

1. OUR COMMITMENT TO THE CODE OF BUSINESS CONDUCT & ETHICS

Our Commitment to the Code of Business Conduct & Ethics
Applying Our Code Across the Company
We Encourage and Support a Speak-Up Culture Our
Corporate Compliance Program
Seeking Guidance and Reporting Concerns of Illegal or
Unethical Behavior
Our Compliance Team and Hotline Non-
Retaliation Policy Investigation and
Enforcement Consequences of Violations

2. OUR RELATIONSHIP WITH EACH PERSON IN THE WORKPLACE

Respect in the Workplace
Equal Employment Opportunity and Anti-Harassment Diversity
Workplace Health and Safety Maintaining a
Secure Work Environment Commitment to
Human Rights
Comply with Environmental Laws and Regulations

3. OUR RELATIONSHIP WITH OUR CUSTOMERS

Responsibility to Our
Customers Responsibility to
Our Communities Fair
Dealing and Purchasing
Practices
Compliance with Applicable Laws and
Regulations Political and Charitable Activities
Interactions with Healthcare Professionals

4. OUR RELATIONSHIP TO THE COMPANY AND TO OUR SHAREHOLDERS

Protecting Company Assets
Accurate and Complete Business and Financial
Records Full, Fair and Accurate Disclosure
Confidential and Proprietary
Information Protecting Personal
Data
Intellectual Property
Public Communications from the
Press Social Media
Company Emails
External Media
Platforms
Insider Trading and Securities Dealing
Policy Conflicts of Interest
Gifts and Entertainment to Customers and
Vendors Gifts and Entertainment to
Government Officials

1. OUR COMMITMENT TO THE CODE OF BUSINESS CONDUCT & ETHICS

Commitment to this Code of Business Conduct & Ethics

This Code of Business Conduct and Ethics (this “Code”) applies to all directors, officers, and employees of AVITA Medical, Inc., and its subsidiaries and affiliates, including but not limited to AVITA Medical Americas, LLC (collectively, “AVITA Medical”, or the “Company”) (such persons, unless otherwise specified, will be referred to jointly as “Employees”). The purpose of this Code is to set forth AVITA Medical’s commitment to high moral and ethical standards of business conduct. Each Employee is expected to know and follow the principles set forth in this Code to help ensure the business of AVITA Medical is conducted with integrity and in compliance with the law. Several provisions in this Code refer to more detailed policies that either (1) concern more complex Company policies or legal provisions or (2) apply to select groups of individuals within the Company. If these detailed policies are applicable to you, it is important that you read, understand, and be able to comply with them. If you have questions as to whether any detailed policies apply to you, contact your immediate manager or our General Counsel.

This Code has been prepared so that Employees will have available a clear statement of the Company’s general policies and principles concerning business conduct and ethics. However, no code or set of values can address every ethical choice faced in business, and no oversight group can ensure complete compliance. Therefore, Employees are expected to use good common sense and judgment in their personal conduct. When you are uncertain about any situation, are confused as to what actions you should take in a given situation or wish to report a violation of the law or this Code, you must ask for guidance, and you must do so in a timely manner. This Code provides you with several options for seeking guidance, which are explained in the “*Seeking Guidance Reporting Concerns of Illegal or Unethical Behavior*” section of this Code.

At commencement of employment, each Employee shall sign the Business Relationship, Personal Commitment, and Acknowledgement Form (see Appendix A), to indicate they have received, read, understand, and agree to comply with the Code.

Applying This Code Across the Company

The Company believes that effective corporate governance begins with a strong Board of Directors and a management team committed to living up to high standards of the Code and ethical behavior. These principles set the tone and create the environment to help assure that management and all Employees of the Company do the right things for the right reasons. All Employees of AVITA Medical and anyone who conducts business on the Company’s behalf are responsible for understanding and complying with the Code. In addition, the Company must maintain an effective system of internal controls. We have developed a system of internal controls and reporting mechanisms designed to protect the assets and operations of the Company and to provide management and the Board with accurate, honest and timely information. Employees are required to live up to the letter and spirit of our system of internal controls, and to cooperate fully with any audit or investigation.

If you are ever unsure about whether you are acting in accordance with the Code, ask yourself:

- **Does it feel like you are doing the right thing?**
- **Is it legal?**
- **Is it consistent with the Code and Company policies?**
- **Would you feel comfortable if your decision was made public?**

If the answer to any of the questions is “no,” ask the appropriate person for guidance using the information on page 8.

We Encourage and Support a Speak-Up Culture

We encourage you to speak up any time you believe there has been a violation of our Code. Compliance concerns raised in good faith are promptly investigated. If our investigation indicates there is a problem, we will address it. We do not tolerate retaliation against anyone.

Our Corporate Compliance Program

AVITA Medical is committed to maintaining an effective Corporate Compliance Program to help assure compliance with the Code and with all applicable regulations, statutes, and laws to protect the Company’s reputation; to encourage a culture of “doing the right thing;” providing an avenue for stakeholders and Employees to raise potential issues through; assuring that Employees are accountable in raising such issues of potential or actual non-compliance; and detecting and remedying non-compliance matters. The Company’s Corporate Compliance Program is built around the framework of the Office of Inspector General Health and Human Services Guidelines of Seven Elements of an Effective Compliance Program as well as the U.S. Sentencing Commission Guidelines Manual (“Federal Sentencing Guidelines”).

Seeking Guidance and Reporting Concerns of Illegal or Unethical Behavior

It is important Employees immediately report all actual or potential violations of this Code or other possible illegal or unethical behavior. The following resources are available to answer questions and address concerns.

Our Compliance Team and Hotline

1. Your Manager

The Company encourages Employees to work with their manager or a member of senior management with whom they may feel comfortable speaking to when in doubt about the best course of action in a particular situation, and in reporting actual or potential illegal or unethical behavior. Additionally, the alternative means listed below are available for reporting concerns.

Managers have key roles in the administration of this Code and are expected to demonstrate their personal commitment to the Company's standards of conduct and to manage their Employees accordingly. Managers must immediately report to our General Counsel or Compliance Manager any concerns reported by their Employees to them regarding actual or potential violations of this Code or other possible illegal or unethical behavior.

Managers have an obligation to educate their team about this Code and our values.

If an Employee or business partner raises a potential compliance concern:

- ***Make time to listen to the potential concern;***
- ***Let the Employee or business partner know you will follow up on the concern; and***
- ***Contact the Compliance Team for guidance on next steps.***

If you believe the issue may be a violation of law, immediately contact the General Counsel.

2. Our Compliance Team

Employees can contact the Compliance team to report a concern about the Code or for guidance or direction about any of the topics covered in this Code. The Compliance team can be reached directly at compliance@avitamedical.com

3. Our Human Resources Representative

Your human resources representative, Rob Hall, is available to help and to provide guidance about workplace concerns. Please contact him at rhall@avitamedical.com.

4. Our Legal Representative

If you believe that the issue raised may be a violation of law or if you prefer to speak directly with legal, please contact AVITA Medical's General Counsel, Donna Shiroma, at dshiroma@avitamedical.com.

5. Our Compliance Hotline

If you feel uncomfortable discussing your questions or concerns in person, or if you are concerned that your manager or other member of management may be involved, our Compliance Hotline offers three options for you to report ethics and compliance concerns via phone or online. The reporting services are available 24 hours a day, 7 days a week, and anonymous reporting is available where allowed by law.

- You are able to report issues online at: reports@lighthouse-services.com
- Or report issues via our third-party service, Syntrio Lighthouse Services at www.lighthouse-services.com/avitamedical or by calling 1 (844) 420-0044

Your voice matters! If you have a question or concern, we want you to raise it.

Compliance Team: compliance@avitamedical.com

General Counsel: dshiroma@avitamedical.com

Compliance Hotline: 1 (844) 420-0044

Email: reports@lighthouse-services.com

Website: www.lighthouse-services.com/avitamedical

Human Resources: rhall@avitamedical.com

From within Australia – Optus Carrier: Dial: 1-800-551-155

Wait for tone

Enter toll-free number: 800-603-2869

From within Australia – Telstra Carrier: Dial: 1-800-881-011

Wait for tone

Enter toll-free number: 800-603-2869

United States: Toll-Free: 1-844-420-0044

Non-Retaliation Policy

We do not tolerate retaliation against anyone who raises a compliance concern in good faith or participates in an internal investigation. Employees who retaliate or attempt to retaliate against anyone who reports a concern in good faith or participates in an internal investigation are subject to discipline, up to and including termination of employment. Employees who believe they have experienced retaliation for raising a compliance related concern should report it immediately to the General Counsel or Chief Executive Officer.

AVITA Medical does not tolerate retaliation against or the victimization of anyone who raises concerns or questions regarding a potential violation of this Code, illegal or unethical behavior or any Company policy that he or she reasonably believes to have occurred.

Retaliation includes obvious actions such as a demotion or termination of employment, but retaliation can also include other actions that have a detrimental effect on an Employee's career with the Company.

We encourage a speak-up culture, and all forms of retaliation are prohibited.

Investigation And Enforcement

1. We have a formalized process in place to promptly investigate good faith reports of potential violations of our Code, our Company policies, or the law, and we take appropriate action in response.
2. The Compliance Officer will initiate an inquiry into the alleged violation, complaint, or concern upon receiving the reported allegation. An interview with the Employees and others who may have relevant information is conducted with a written report summarizing the findings and a conclusion as to whether an investigation is warranted.
3. If an investigation is warranted, the Compliance Officer shall undertake all reasonable steps necessary to ensure a fair and thorough investigation is conducted. We take all practicable steps to ensure an impartial and unbiased investigation, including participation of parties with the appropriate subject matter expertise and without conflicts of interest with the complainant. At the conclusion of the investigation, a written report to senior management is provided.
4. If the statement of findings in the report conclude that any misconduct occurred, the offender is provided the opportunity to respond to each allegation. If the statement of findings concludes that no misconduct occurred, we work with the appropriate individual to make every reasonable effort to restore and protect the reputation of the individual under investigation.

5. If the statement of findings conclude that misconduct occurred, we take the appropriate disciplinary action, up to and including termination of employment. Violations of law could also lead to civil or criminal liability for the individuals involved and our Company.
6. Company officers and managers at all levels are responsible for monitoring and enforcing this Code within each of their areas of accountability. If you observe or learn of a situation which you believe may violate or lead to a violation of this Code, report the concern using the resources described in this Code.
7. AVITA Medical's Board of Directors provides oversight of this Code and is provided up-to-date reports of any compliance investigations and violations by senior management.

Consequences of Violations

Employees will be held accountable for adherence to this Code. Failure to comply with any responsibilities established by this Code may result in disciplinary action and may also require restitution or reimbursement from the Employee and referral of the matter to government authorities.

2. OUR RELATIONSHIP WITH EACH PERSON IN THE WORKPLACE

Respect in the Workplace

Our goal is to make AVITA Medical a stimulating and dynamic place to work, where all Employees are given the opportunity to achieve their potential based on their diverse experience. This Code extends to our day-to-day business relationships at every level within the Company. Every Employee should be treated with respect, care, and concern. The combination of each person's unique experiences and backgrounds sparks solutions, innovations, and growth creating a better world in which we can positively impact patient's lives.

Equal Employment Opportunity and Anti-Harassment

We know that our continued growth is enhanced by a diverse and inclusive workforce. This means that we make employment decisions based only on qualifications and merit and not on the basis of race and associated traits, color, age, sex, sexual orientation, gender identity and expression, religion, national origin, or any other characteristics protected by law. We do not tolerate discrimination or harassment on the basis of any of these categories. We adhere to various hiring and employment regulations, including but not limited to the Equal Employment Opportunity Act, Americans with Disabilities Act as well as the California Fair Employment & Housing Act.

We are committed to providing equal employment opportunities for all our Employees and will not tolerate any speech or conduct that is intended to, or has the effect of, discriminating against or harassing any qualified applicant or Employee because of his or her race, color, religion, sex (including pregnancy, childbirth or related medical conditions), sexual orientation, national origin, age, physical or mental disability, veteran status, or any characteristic protected by law. We will not tolerate discrimination or harassment by anyone – managers, supervisors, co-workers, vendors or our customers. This policy extends to every phase of the employment process, including recruiting, hiring, training, promotion, compensation, benefits, transfers, discipline and termination, layoffs, recalls, and Company-sponsored educational, social and recreational programs, as applicable. If you observe conduct that you believe is discriminatory or harassing, or if you feel you have been the victim of discrimination or harassment, you should notify the Vice President of Human Resources or our General Counsel immediately.

Not only do we forbid unlawful discrimination, but we also take affirmative action to ensure that applicants are employed, and Employees are treated during employment, without regard to their race, color, religion, sex (including pregnancy, childbirth or related medical conditions), sexual orientation, national origin, age, physical or mental disability, veteran status, or any characteristic protected by law.

The Human Resources Department has been assigned specific responsibilities for implementing and monitoring affirmative action and other equal opportunity programs. One of the tenants of this Code, however, is that all Employees are accountable for promoting equal opportunity practices within the Company. We must do this not just because it is the law, but because it is the right thing to do.

We will not retaliate against any Employee for filing a good faith complaint under our anti-discrimination and anti-harassment policies or for cooperating in an investigation and will not tolerate or permit retaliation by management, Employees, or co-workers. To the fullest extent possible, the Company will keep complaints and the terms of their resolution confidential. If an investigation confirms harassment or discrimination has occurred, the Company will take corrective action against the offending individual, up to and including immediate termination of employment, as appropriate.

Diversity

The Company is committed to establishing measurable objectives for achieving diversity and to reviewing, at least annually, the measurable objectives for achieving diversity in the composition of its Board, senior executives, and workforce generally, and the Company's progress in achieving them.

Where any such measurable objectives have been established by the Board, then the Board will disclose these measurable objectives and the Company's progress towards achieving those objectives in its annual reporting.

The Company currently has policies in place to recognize and support diversity. This Code of Ethics and Business Conduct sets out the Company's commitment to equal employment opportunities and harassment prevention in the workplace. The Company's Equal Employment Opportunity Policy, which forms part of the Company's Employee Handbook, also sets out the Company's formal policies against unlawful discrimination and how grievances may be escalated and addressed.

Workplace Health and Safety

The Company is committed to providing safe and healthy working conditions. This means that we expect all work to be performed in accordance with all health and safety laws, regulations and Company policies governing our activities.

We believe that management and each and every Employee have a shared responsibility in the promotion of health and safety in the workplace. You should follow all safety laws and regulations, as well as Company safety policies and procedures. This also means that violence in the workplace is never acceptable. If you see or experience any event that raises concerns about your safety or the safety of others, including witnessing any accident, injury or unsafe equipment, practices, or conditions, immediately alert your manager.

With this in mind, you may not use alcohol or other intoxicants on Company premises, except at sponsored company functions, with appropriate pre-approval. You may not use, possess, or distribute illegal drugs, or abuse legal drugs, while on Company time or property. Employees should review the Employee Handbook for additional guidance.

Maintaining a Secure Work Environment

We are responsible for keeping our work environment secure. AVITA Medical does not tolerate any type of workplace violence committed by or against any Employee on Company premises. Such examples include but are not limited to using threatening language or any other acts of aggression or violence made by or against any Employee regardless of whether the conduct occurs on or off premises, destroying or defacing property belonging to the Company, visitors, or Employees intentionally or unintentionally in the course of a threat of a violent act.

Employees of AVITA Medical should help to ensure that our headquarters in Valencia, CA, as well as our manufacturing facility in Ventura, CA and our laboratory facility in Irvine, CA are secure at all times. You should not allow a person to follow you into an AVITA Medical building who has no badge. You must inform Human Resources or a C-Suite member if there is any situation that could put you or other Employees at risk.

Commitment To Human Rights

We are committed to humane working conditions. We do not tolerate any conduct that encourages or facilitates human trafficking, child labor, forced labor, or any other human rights abuses. This commitment applies not only for our own workforce, but also for our third-party suppliers or other business partners that may be engaged in actions that would violate the Code and you should report it using the resources described in this Code.

Comply With Environmental Laws and Regulations

We strive to continuously improve in reducing environmental impacts from our operations, products and services and conduct our business in an environmentally responsible manner. We comply with environmental regulations and standards applicable to our operations to minimize environmental pollution and to contribute to environmental protection.

3. OUR RELATIONSHIP WITH OUR CUSTOMERS

Responsibility to Our Customers

Each Employee has important responsibilities to the Company's customers. While some Employees are closer to customers than others, every Employee should think in terms of how the Company's customers feel about how it conducts business, and you should act accordingly. Customers depend on you to be true to your word. Nothing undermines the Company's reputation faster than misrepresenting itself. Simply put, those who do business with the Company deserve honest, accurate and clear communication. They also deserve and need to know that the Company keeps its promises. Equally, customers and suppliers need to be aware of the Company's standards and expectations regarding ethics and business integrity and should be encouraged to help uphold them.

Responsibility to Our Communities

The Company is privileged to do business in many communities around the country and must act responsibly in those communities. This means conducting operations with professional care.

Fair Dealing and Purchasing Practices

The Company is committed to dealing fairly with its customers, suppliers, competitors, and Employees. No Employee may take unfair advantage of anyone through manipulation, concealment, abuse of confidential information, misrepresentation of material facts, fraud, or other unfair dealing practices. The Company will compete for business aggressively and honestly. It is never permissible to knowingly make false or misleading claims about the Company's products or services or about our competitors to gain competitive advantage or for any other purpose.

The Company believes in doing business with those who embrace and demonstrate high standards of business conduct. The Company will not look favorably on customers or suppliers that have a history of violating the law, including environmental, employment or safety laws. Those that knowingly seek to have Company Employees violate this Code will be subject to appropriate sanctions, including the possible cancellation of all current and future business.

The Company's policy is to purchase all goods and services on the basis of price, quality, availability, terms and service, and in accordance with management's authorization. All purchasing decisions will be based on the value realized by the Company and in alignment with its business standards and goals. Agreements should be in writing and set forth expectations for all parties.

Compliance with Applicable Laws and Regulations

While the Company is involved in highly competitive business activities and hence must compete vigorously for market share and the maximization of profits, the Company must also do so in compliance with all laws and regulations applicable to its activities. No Employee may at any time take any action on behalf of the Company that he or she knows, or has reason to suspect, violates any applicable law or regulation. Although this Code and other Company policies and procedures may not address a specific law, regulation or compliance situation, ignorance is not an acceptable excuse for non-compliance. The Company's strict compliance policy extends, therefore, not just to those areas set forth below and elsewhere in this Code, but also to all other applicable laws and regulations. It is your responsibility to know and follow the law and conduct yourself in an ethical manner. It is also your responsibility to report any violations of the law or this Code. You may report such violations by using the resources provided in this Code. If you have any hesitation or question about the legality of a situation, you must contact our General Counsel immediately for further guidance.

1. Antitrust and Fair Competition

Antitrust laws are designed to ensure a fair and competitive marketplace by prohibiting various types of anticompetitive behavior. It is the Company's policy and the responsibility of each Employee to comply with the federal and state antitrust laws. Employees must avoid price fixing, customer and market allocations, bid rigging and other arrangements with competitors that are unlawful per se, and they may never exchange sensitive business information with competitors. Unless the information is publicly available, Employees should avoid discussing the following subjects with any competitor: prices, terms or conditions of sale; credit terms, discounts, profits, profit margins or costs; shares of the market; distribution practices; bids on contracts or jobs; sales territories; selections, rejections or terminations of customers; or any other matters where an agreement with a competitor would be inconsistent with the complete freedom of action of the Company in the conduct of its business. Representatives of the Company must never engage in competitive conduct that cannot be justified by sound business considerations wholly apart from its effect on any injured competitor. If you are unsure whether a contemplated action might violate any of the antitrust laws, you must review it with our General Counsel prior to implementation.

2. Compliance With Tax Laws

It is the policy of the Company to obey local, state, and federal tax laws. No Employee should, on behalf of the Company, enter into any transaction that the Employee knows or has reason to suspect would violate such laws.

3. Anti-Corruption Laws and Bribery: Commercial Parties and Government Officials

Please see the section of this Code entitled "Gifts and Entertainment" for additional information.

- a. No Employee may make any bribe, kickback or other improper payment on

his or her own behalf or on behalf of the Company in connection with any of its business. We take a stand against corruption and are committed to doing business ethically.

- b. We do not accept or offer bribes, kickbacks, payoffs or inappropriate gifts or entertainment, or other favors to or from commercial parties. We must never authorize a third party to make or accept improper payments on our behalf.
- c. Additionally, we do not offer or promise to pay anything of value, including bribes, kickbacks, payoffs, gifts or entertainment or other favors to any government official. Conducting business with governments is not the same as conducting business with private parties. What may be considered an acceptable practice in the private business sector may be improper or illegal when dealing with government officials. Improper or illegal payments to government officials are prohibited. "Government officials" includes Employees of any government anywhere in the world, even low-ranking Employees, or Employees of government- controlled entities, as well as political parties and candidates for political office. If you deal with such persons or entities, you should consult with our General Counsel to be sure that
- d. you understand these laws before providing anything of value to a government official.
- e. If you are involved in transactions with foreign officials, you must comply not only with the laws of the country with which you are involved but also with the U.S. Foreign Corrupt Practices Act and other relevant laws and regulations. This ban on illegal payments and bribes also applies to agents or intermediaries who use funds for purposes prohibited by the statute.
- f. Acts of bribery and corruption may well result in persons being exposed to criminal and civil liability. Please see the section of this Code entitled "*Gifts and Entertainment*" for additional information.

What is considered a bribe? In addition to cash, bribes may also include:

- ***Gifts, especially gifts beyond a nominal value;***
- ***Entertainment, hospitality and/or travel is beyond reasonable business needs;***
- ***Offers of employment, including internships;***
- ***Favors for family or friends;***
- ***Awarding of contracts or business; and***
- ***Payments or benefits for services for an individual's family members or acquaintances, including offers of employment.***

4. Economic Sanctions and Boycotts

The United States, European Union member states and many other jurisdictions implement economic sanctions measures against foreign countries, individuals, and entities for a variety of foreign policy and national security objectives. Some of these sanction measures are comprehensive banning all trade with a country. Other sanctions programs are selective, prohibiting some, but not all activity with a particular country, such as import/export bans, restrictions on financial transactions, asset blocks, and sector-specific trade restrictions. Finally, some sanctions programs target persons or entities who have been designated as “fronts” for embargoed countries or who are believed to be engaged in activities of security or foreign policy concern, including terrorism, narcotics trafficking, weapons proliferation, and destabilization activities.

Many countries and jurisdictions have also enacted countermeasures to block the application of unsanctioned foreign boycotts within their own jurisdictions or by their nationals. These measures generally prohibit nationals from refusing to do business with another country in furtherance of an unsanctioned foreign extraterritorial boycott program and may impose reporting requirements on certain demands and activities relating to the attempts to implement unsanctioned foreign extraterritorial boycotts.

All Employees are expected to follow internal procedures applicable to economic sanctions and boycott-related matters.

5. Anti-Money Laundering

Money laundering is the process by which criminal funds are moved through the financial system in order to hide all traces of their criminal origins such that the funds appear legitimate. Laws in the United States and other jurisdictions criminalize money laundering and certain failures to report and detect financial crimes. In general, U.S. law and the laws of other jurisdictions prohibit knowing participation in any transaction involving the proceeds of illegal activity. All Employees must fully comply with all applicable anti-money laundering and anti-terrorism laws.

Employees should be vigilant and exercise good judgment when dealing with unusual customer transactions. Alert your supervisor or our General Counsel to any situation that seems to you to be inappropriate or suspicious. Do not alert the customer to your suspicions, but ask whatever questions are necessary to understand the customer’s identity, source of funds and reasons for the transaction. Do not discuss your suspicions with third parties unless directed to do so by your supervisor after consultation with our General Counsel. If you have questions or concerns, contact our General Counsel.

Political and Charitable Activities

Political activities must be conducted on your own time and using your own resources. Political contributions by corporations in federal elections, whether by direct or indirect use of corporate funds or resources, are unlawful. While the limitations on political contributions by corporations in state elections vary from state to state, it is the Company's policy not to make any political contributions in such elections except with the prior approval of our Chief Financial Officer. While individual participation in the political process and in campaign contributions is proper and is encouraged by the Company, an Employee's participation and involvement must be at their own time and expense unless state law requires otherwise. Similarly, an Employee's contribution must not be made, or even appear to be made, with the Company's funds, or be reimbursed from the Company's funds, nor should the selection of a candidate or of a party be, or seem to be, coerced by the Company. Company Employees are prohibited from using their positions to induce, coerce or in any way influence any person (including subordinates) to contribute time or money to any political party, to the campaign of any candidate for office or to any charitable activity.

We realize how important it is to contribute to the communities in which we operate. We support many initiatives and programs that benefit our communities and encourage you to be charitable and volunteer your time to worthwhile endeavors. However, you should not engage in any charitable activities as a representative of the Company unless previously approved by our General Counsel.

Interactions with Healthcare Professionals

It is the responsibility of all AVITA Medical Employees to conduct themselves in an appropriate, ethical, and legally compliant manner when interacting with a healthcare professional (HCP). An appropriate and ethical relationship with HCPs is an essential part of the Company's business. A critical element of this relationship is ensuring that HCPs have the most accurate information available and that such information is provided in a compliant manner.

AVITA Medical interacts with HCPs by sharing and exchanging valuable medical and scientific information with the goal of benefiting the patient. The Company may on occasion provide modest business meals and reimburse travel expenses to HCPs when deemed appropriate and conducive to a legitimate business purpose and/or need when meeting with HCPs. Providing business courtesies such as food, meals, gifts, or travel should never be the primary purpose of interacting with an HCPs and should not be perceived by a third party to influence an HCP's professional business judgment and/or actions.

It is the responsibility of AVITA Medical Employees to abide by the Policy on Interactions with Healthcare Professionals, as well as this Code, the Advanced Medical Technology Association Code of Ethics on Interactions with Health Care Professionals (AdvaMed Code), state and federal aggregate spend regulations governing the tracking and reporting of payments and transfers of value to HCPs, and other applicable federal, state and local laws, rules, regulations, policies, guidelines and procedures.

AdvaMed Code recognizes the obligation to facilitate ethical interactions between medical device companies such as AVITA Medical and HCPs. The AdvaMed Code provides guidance on marketing to HCPs, developing relationships between our Company and HCPs, providing scientific and educational information, and supporting medical research and education. AVITA Medical has adopted the AdvaMed Code to govern its marketing and promotional activities. AVITA Medical must ensure that interactions with HCPs are conducted in accordance with the AdvaMed Code.

1. Interactions with Healthcare Professionals: False Claims Act and Anti-Kickback Statute

The False Claims Act (FCA) imposes liability on individuals and companies for knowingly presenting or causing a false claim to be submitted to the government for payment or approval. FCA liability may arise in circumstances in which AVITA Medical promotes or markets any Company product in an inappropriate manner, such as for a use or benefit that is not approved by the FDA. FCA includes both the federal law and state and municipalities who have enacted their own false claims acts. There are significant criminal and civil penalties for violating the FCA.

The Anti-Kickback Statute (AKS) prohibits offering, paying, soliciting, or receiving anything of value to anyone in return for referring a product or service reimbursed under a federal or state healthcare program. As such, AVITA Medical Employees are prohibited from offering, paying or soliciting anyone in exchange for recommending or purchasing AVITA Medical's products. AKS penalties include but are not limited to civil and criminal fines, as well as imprisonment and debarment from federal programs.

2. Interactions with Healthcare Professionals: Modest Meals or Snacks and Other Transfers of Value

On occasion, modest meals or snacks may be provided to an HCP incidental to a bona fide scientific, medical, or educational discussion. The setting of the meal should be conducive to the bona fide scientific medical or educational discussions and exchange of information and take place in a reasonable or modest location in the instance in which the HCP's place of business is not available or conducive. Meals are only provided to HCPs attending the meeting and not to an entire office staff where everyone does not attend the meeting. Under no circumstances may an HCP's spouse, family member or other guest receive a meal unless they are an HCP who has the same medical specialty and background as the invited HCPs. Meals must not be part of an entertainment or recreational event. AVITA Medical has defined dollar amounts for meals and must be clearly marked in its expense system as to the amount of the meal or expenditure per person in order for the Company to comply with the federal National Physician Payment Transparency Program or Open Payments as well as the individual state marketing reporting requirements. AVITA Medical Employees may not provide a meal, irrespective of whether the food is delivered or dropped off, if they are not present. Business meals may not be offered without conducting a business meeting with the Company Employee present. Employees may never give an HCP cash or cash equivalents

(e.g., gift certificates, credit cards) to purchase a meal.

In addition to reporting of HCP meals, AVITA Medical and its Employees must comply with all state and federal laws and regulations that govern the tracking and reporting of certain payments and transfers of value to HCPs which include but are not limited to, reporting of consulting fees, speaker fees, advisory board member fees, charitable contribution and other compensation of any kind and non-monetary compensation such as reimbursement for or payment for travel, lodging, reprints and educational items.

3. Interactions with Healthcare Professionals: Education and Training

Education and training given to HCPs by AVITA Medical Employees must be provided to educate HCPs. Such programs and events should be conducted in settings that are conducive to the effective transmission of information. Employees may provide HCP attendees with modest meals and refreshments in connection with these programs but they must be modest in value and subordinate in time and focus to the training or educational purpose of the meeting. When there are objective reasons to support the need for out-of-town travel to efficiently deliver training and education on AVITA Medical products, the Company may pay for reasonable travel and modest lodging costs of the attending HCPs. The Company may also pay for consulting hours as agreed upon in a written contract drafted by the Company's legal department and signed by both parties.

Promotional presentations and communications with HCPs serve an important function for AVITA Medical. When promoting AVITA Medical products, compliance with all applicable laws and regulations is required. Prior to use, all promotional materials provided to HCPs must be reviewed and approved through the Medical, Legal, Regulatory Review Committee. Employees must abide by the MLR Review Policy and External Generated Material Policy.

4. OUR RELATIONSHIP TO THE COMPANY AND TO STAKEHOLDERS

Protecting Company Assets

The Company's assets are meant for the Company, and not personal use. Company assets include your time at work and work product, as well as the Company's equipment, computers and software, company provided cell phones, office furniture, machinery, Company information including sales data and financial assets, intellectual property including our trademarks, patents, copyrights, trade secrets and our reputation. You must protect the Company's assets from loss, damage, misuse, theft and waste and ensure their efficient use. Failure to safeguard our assets is a violation of this Code, our policies and our shared commitment to protect our business. If you become aware of theft, waste or misuse of our assets or funds or have any questions about your proper use of them, you should promptly report that concern using the resources described in this Code.

Accurate and Complete Business and Financial Records

The Company is responsible for furnishing reliable financial information on a periodic and timely basis to our shareholders, potential shareholders and others. It is the policy of the Company to maintain books, records and accounts that, in reasonable detail, accurately reflect the authorized transactions of the Company. To that end, no undisclosed or unrecorded fund or asset shall be established for any purpose. No false or artificial entries shall be made in the books and records of the Company for any reason, and no Employee shall engage in any arrangement that results in any such entry. The policy of accurate and fair recording also applies to an Employee's maintenance of time reports, expense accounts and other personal Company records. In addition, all sales reports, production records, sales orders and similar business records must be valid, accurate and complete.

Integrity in every aspect of the way the Company is managed is a key element in the Company's corporate culture. No Employee may compromise the integrity of the Company's records, even if such action is based upon a sincere belief that such action might actually help the Company improve its financial performance. Falsifying records or keeping unrecorded funds and assets is a severe offense and may result in prosecution or loss of employment.

The Company's Records Management Policy establishes what records will be maintained and the length of time such records shall be maintained. You must not destroy or alter any documents or records (including informal data such as e-mail, expense reports and internal memos) in response to any investigation, suspected investigation or lawful request.

If you have a concern regarding the Company's accounting, internal accounting controls or auditing matters, you should promptly report that concern to the Chief Financial Officer or General Counsel.

Full, Fair and Accurate Disclosure

Information derived from our records is provided to our stakeholders and investors as well as government agencies. Thus, our accounting records must conform not only to our internal control and disclosure procedures but also to generally accepted accounting principles and other laws and regulations, such as those of the Internal Revenue Service. It is the Company's policy that all public communications made by the Company be full, fair, accurate, timely and understandable.

Confidential and Proprietary Information

The Company's success is largely dependent upon the strict adherence by Employees to the Company's policy regarding confidential and proprietary information. Confidential or proprietary information includes all non-public information about the Company and its operations that might be of use to competitors or harmful to the Company. It may include, for example, the Company's proprietary technical information, strategic business plans (including proposed acquisitions or divestitures), customers, suppliers, financial information, capitalization or contracts.

You must maintain the confidentiality of this information except where disclosure is authorized or legally mandated. Proprietary information should be marked accordingly and kept secure. Employees must not, without proper authority, give or release to anyone not employed by the Company or to another Employee who has no need for the information, data or information of a confidential or proprietary nature concerning the Company. When an appropriately authorized Employee provides confidential or proprietary information to a third party, the Employee must ensure that confidentiality terms are included in a confidentiality agreement between the Company and that third party. All confidentiality agreements must be drafted and reviewed by our General Counsel. If you have questions about the confidentiality of information or the need for a confidentiality agreement, seek advice from our General Counsel.

Protecting the confidential and personal information of our Employees and our customers is also of great importance. Anyone who handles such information should take great care in doing so. Additionally, you should never try to persuade others to violate the confidentiality of other companies. Your responsibility to preserve confidential information continues even after your employment with the Company ends. Any Employee who suspects that the Company's confidential or proprietary information is being disclosed must immediately report this suspicion using the resources described in this Code.

Confidential information could be:

- **Non-public financial information;**
- **Marketing or sales plans;**
- **Pricing strategies;**
- **Customer or supplier list;**
- **Pricing data;**
- **Research and development plans;**
- **Trade secrets;**
- **Any information of a third party, such as a vendor, that we have agreed to keep confidential;**
- **Personal information which identifies a specific individual; and**
- **Customer names and addresses.**

Protecting Personal Data

We do not permit the improper collection or use of Employees and third parties' personal data. Protecting personal data and the right to privacy has become a priority not only in the United States but in many countries around the world, including in Europe under the General Data Protection Regulation, where a breach of the data protection laws exposes the Company to significant fines. Be aware that privacy and data protection laws differ from country to country, and what is legal in the United States might not be in the European Union and other countries.

We have standards in place to safeguard the personal data of our Employees, consumers and other third parties used in the course of our business. Personal data is defined as information in any form that, on its own or in combination with other information, can be used to identify an individual. AVITA Medical's Handling of Personal Data Policy sets forth the access, use and retention of personal data to what is strictly necessary to carry out business duties.

If you suspect in any case that an individual's personal data has been compromised, immediately report it to the General Counsel or Director of Information Technology.

Intellectual Property

Every Employee must safeguard AVITA Medical's confidential and proprietary information, trade secrets and other intellectual property, which includes copyrights, trademarks, and patents.

AVITA Medical Employees must not disclose any information that might compromise proprietary technologies or trade secrets to any unauthorized persons. You also must take reasonable precaution against inadvertently disclosing this information to anyone not authorized to have it.

Additionally, you must respect the intellectual property rights of others. You may not duplicate or gain the intellectual property of others through any means, unless given permission by the intellectual property holder. Please consult the General Counsel for any questions.

Public Communications From The Press

All inquiries or calls from the press should be referred to our Chief Financial Officer. If you receive any calls from financial analysts, the financial press or others in the financial community, you should refer the inquiries to our Chief Financial Officer. Unless you are expressly authorized otherwise by our Chief Financial Officer or Chief Executive Officer, you may not communicate with the press and the financial analyst community.

Social Media

AVITA Medical believes social media offers a great way to exchange ideas and make connections. Social Media can bring benefits to AVITA Medical, particularly for building relationships with current and potential stakeholders. However, Company Employees who use social media must do so in a way that does not maliciously diminish the Company's prospects and maintains the security, confidentiality, and data protection of others and of the Company. You must abide by our Social Media Policy.

Employees must be respectful and abide by AVITA Medical's integrity standards. Do not use discriminatory, harassing, intimidating or offensive language. All communication must be free from racial, ethnic and/or religious slurs, physical or sexual characteristics, and/or any other protected classification. Do not maliciously create or transmit material that might be defamatory to or incur liability for AVITA Medical or that could damage the Company's image or reputation. Never use social media for any illegal or criminal activities. AVITA Medical Employees are to use discretion and abide by this Code when interacting with AVITA Medical competitors. Never discuss colleagues, suppliers, or agents of AVITA Medical without their approval.

External Media Platforms

Be transparent and make necessary disclosures. AVITA Medical Employees must disclose their association with the Company when posting on external social media. Personal posts should be clear that individual statements or opinions expressed are their own and do not necessarily represent those of the Company.

Never share personal information about a patient or customer without express written permission. Patient privacy is paramount and is further covered by the Health Insurance Portability and Accountability Act of 1996 in the United States, U.S. state and federal laws, the European Union General Data Protection Regulation and other regional regulatory bodies.

Employees may re-tweet, like, share and/or pin Company sponsored posts using their personal account but must not modify or add to AVITA Medical social media posts. AVITA Medical Employees must not create their own posts about the Company products or Company specific information. Employees must not re-tweet, like, share, and/or pin material regarding AVITA Medical or its products, goods or services, that was created and communicated by parties external to the Company. Company Employees may not comment on a customer or endorse a physician or customer on personal social media. They should not use logos and trademarks owned by AVITA Medical in personal posts. Company Employees should exercise judgment in everything that is posted online, knowing what is said can be seen around the world.

Company Emails

Under no circumstances will comments of a critical or defamatory nature regarding the Company, its Employees, customers or vendors be posted on the Internet or social media platforms or made in an otherwise public manner. This applies whether you are at work or away from the office. The Company owns all e-mail messages that are sent from or received through the Company's systems. We may monitor your messages and may be required to disclose them in the case of litigation or governmental inquiry.

Insider Trading and Securities Dealing Policy

Buying or selling securities while possessing material nonpublic information or disclosing such information to others who may trade on the basis of that information is prohibited by federal, state, and foreign laws. You must comply with the Company's Insider Trading and Securities Dealing Policy, which has been separately provided to you and can also be found on the Company's website. You may obtain another copy of, and ask questions regarding, the Insider Trading and Securities Dealing policy by contacting our General Counsel.

Conflicts of Interest

A conflict of interest occurs when a person's private interests conflict, or appear to conflict, with the interests of the Company. Each Employee must avoid any investment, interest or association that interferes with the independent exercise of judgment in the Company's best interest.

A conflict situation can arise when a person takes actions or has interests that make it difficult to perform his or her Company work objectively and effectively. Conflicts of interest may also arise when an Employee or a member of an Employee's family receives improper personal benefits as a result of that Employee's position with the Company. Put more simply, when our loyalty to the Company is affected by an actual or potential benefit or influence from an outside source, a conflict of interest exists.

Some conflicts of interest are obvious, for example taking a Company business opportunity for your own financial benefit. Other situations may be less clear. Below are some examples of common potential conflicts of interests.

- Awarding or directing business to suppliers that are owned or managed by family members or close friends.

- Have a side business that competes with the Company or limits your ability to effectively perform your job duties.
- Holding a financial interest in a competitor or vendor of the Company without prior authorization from the Company.

Prompt and full disclosure is always the correct first step towards solving any potential conflict of interest problem. If a person perceives even the potential for a conflict of interest, the personal interests or other circumstances that might constitute such a conflict of interest are to be reported promptly to our Chief Financial Officer or General Counsel and that person must excuse himself or herself from participating in decisions or negotiations involving the possible conflict. Our Chief Financial Officer or General Counsel will arrange for a resolution that respects the person's private life and protects the Company's interests. Any activity that is approved, despite the actual or apparent conflict, must be documented. A potential conflict of interest involving a related person transaction must be submitted to and pre-approved by the Audit Committee.

Gifts & Entertainment to Customers and Vendors

The exchange of gifts and entertainment is a common practice in business and can help the Company build better relationships with customers, vendors and others. However, giving or accepting valuable gifts or entertainment might be construed as an improper attempt to influence the relationship. It is permissible to provide and receive gifts of nominal value and reasonable business entertainment (including traditional promotional events), in each case so long as what is provided or received is consistent with customary business practice, cannot be construed as a bribe or payoff, within our dollar threshold, and is not in violation of applicable law. Gifts and entertainment should support the legitimate business interests of the Company and should be appropriate under the circumstances. You should never encourage or solicit gifts, meals, hospitality or entertainment from anyone with whom the Company does business or from anyone who desires to do business with the Company. A gift or favor should not be accepted or given if it might create a sense of obligation, compromise your professional judgment, could influence or be perceived to influence business decisions or would embarrass the Company or the people involved if publicly disclosed. Misunderstandings can usually be avoided by conduct that makes clear that the Company conducts business on an ethical basis and will not seek or grant special considerations. Gifts, entertainment, hospitality, travel and the like can amount to bribes depending on the specific facts and circumstances involved.

Gifts and Entertainment to Government Officials

Gifts and entertainment provided to government officials are prohibited under this Code, unless pre-approved in writing by the General Counsel. Keep in mind that gifts to government officials may violate the U.S. Foreign Corrupt Practices Act and other U.S. laws and anti-bribery laws in other regions. The U.S. and other governments also have laws and regulations that restrict business gratuities that may be accepted by government personnel. The prohibitions described in the section of this Code entitled "*Anti- Corruption Laws and Bribery: Commercial Parties and Government Officials*" should also be followed.

If you are not sure whether a specific gift, entertainment or hospitality is permissible, or if the proposed recipient is a public official, before doing anything contact our General Counsel.

Managing this Code and Keeping It Current

AVITA Medical's Board of Directors is responsible for ensuring that the Company maintains a Code of Conduct and that it has appropriate processes in place regarding reporting and investigation with respect to such Code.

Periodic Review and Supplements

Changes in laws and regulations that apply to this Company may require changes to this Code from time to time. Accordingly, the Company may adopt supplements and revisions to this Code from time to time without advance notice. These changes will become effective when they are adopted by the Board of Directors, and the Company will notify all Employees of the update which will be promptly posted on the Company's website. Because all recipients must observe all requirements of applicable laws and regulations, failure to review the supplement or revision will not be an acceptable excuse for failure to comply with any applicable law or regulation.

The policies set forth in this Code supersede and replace any and all prior versions thereof.