

Code of Business Conduct & Ethics

November 05, 2025

A Message from Cary Vance, Our Interim Chief Executive Officer



Thank you for your dedication to AVITA Medical and for helping ensure our strong culture of integrity and compliance.

Our Code of Business Conduct & Ethics (the “Code”) represents more than a set of policies and procedures – it reflects who we are as a team and how we choose to do what’s right every day. Working in accordance with the Code’s principles means weaving honesty, accountability, and respect into every decision we make.

Integrity is at the heart of everything we do. When we act with integrity, we build trust with one another – and also with our partners, our customers, and the patients whose lives we are privileged to help transform. This is the AVITA Medical Way: doing the right thing, the right way, all the time.

As we continue our journey together, let’s stay grounded in our shared values and remember that our success is measured not only by what we achieve, but by how we achieve it. Thank you for your commitment to our Company’s mission of Transforming Lives™ – it truly all starts with integrity.

Sincerely yours,

Cary Vance
Interim Chief Executive Officer

Our Mission and Values

Our Mission

AVITA Medical is a leading therapeutic acute wound care company delivering transformative solutions. Our technologies optimize wound healing, effectively accelerating the time to patient recovery. We act with passion, prize integrity, and value knowledgeable patient-centered collaboration. We provide our customers with safe, effective, and innovative therapeutic technologies of the highest quality.

Our Core Values

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

WE ARE FOCUSED ON PATIENT CARE

At AVITA Medical, we care deeply about patients and always put them first. We aim to transform lives and improve outcomes with more effective therapies than the current standard of care.

WE ARE DRIVEN BY INNOVATION

Being a leader in acute wound care medicine means innovating with purpose. At AVITA Medical we develop novel therapeutics to treat life-altering conditions through the development of transformative therapies.

WE PUT PEOPLE FIRST

At AVITA Medical, everyone has an impact and success is achieved through respect, integrity, and accountability. We are united through our passion and dedication to improving the lives of patients through transformative medicine.

WE DELIVER VALUE

We strive to increase corporate value and exceed shareholder expectations through the development and delivery of industry-leading therapies in acute wound care medicine.

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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 (including contractors and other professionals engaged on a temporary basis) (such persons, unless otherwise specified, will be referred to jointly as “Employees” or “you”) of AVITA Medical, Inc., and its subsidiaries and controlled affiliates, including but not limited to AVITA Medical Americas, LLC (collectively, “AVITA Medical”, the “Company”, or “we”). The purpose of this Code is to encourage, as reasonably necessary:

- Honest and ethical conduct, including fair dealing and the ethical handling of actual or apparent conflicts of interest;
- Full, fair, accurate, timely, and understandable disclosures;
- Compliance with applicable governmental laws, rules, and regulations;
- Prompt internal reporting of any known or suspected violations of law or the Code;
- Accountability for adherence to the Code, including fair process by which to determine potential violations;
- Consistent enforcement of the Code, including clear and objective standards for compliance; and
- Protection for persons reporting any such questionable behavior.

Each Employee is expected to read, understand, and follow the principles and procedures set forth in this Code to help ensure the business of AVITA Medical is conducted with integrity and in compliance with the law. Employees must conduct themselves accordingly, exhibiting the highest standard of business and professional integrity, and seek to avoid even the appearance of improper behavior. 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 how to interpret this Code or whether it or any of the Company’s other detailed Compliance policies apply to you or to a particular situation, contact our Chief Legal and Compliance Officer.

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 and Reporting Concerns of Illegal or Unethical Behavior*” section of this Code.

At commencement of employment, and annually thereafter, each Employee shall read the Code and complete the on-line training course provided by the Company, after which they shall execute an attestation that 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 (the “Board”) and an executive leadership team (the “ELT”) committed to living up to the high standards of this Code and ethical behavior generally. 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 were made public?**

If the answer to any of the questions is “no,” ask the appropriate person for guidance in accordance with the section of this Code entitled “Our Compliance Team and Hotline,” below.

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 ensure 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; ensuring 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 Department of Health and Human Services Office of Inspector General Guidelines of Seven Elements of an Effective Compliance Program as well as the U.S. Sentencing Commission Guidelines Manual.

No Rights Created

This Code is a statement of certain fundamental principles, policies, and procedures that govern the Company's Employees in the conduct of the Company's business. It is not intended to and does not create any rights in any Employee, customer, client, visitor, supplier, competitor, shareholder or any other person or entity. It is the Company's belief that this Code is robust and covers most conceivable situations.

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. Reports may be made to any of the parties listed under the section of this Code entitled "*Where Should I Report My Concern?*". If requested, confidentiality will be maintained to the fullest extent possible, subject to applicable law, regulations, and legal proceedings.

The following resources are available to answer questions and address concerns.

Where Should I Report My Concern?

1. The ELT

The Company encourages Employees to work with their manager or a member of the ELT with whom they may feel comfortable speaking 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.

The ELT, together with their respective 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 Chief Legal and Compliance Officer any concerns reported by their Employees to them regarding actual or potential violations of this Code or other possible illegal or unethical behavior.

The ELT has an obligation to educate their teams 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 the ELT member believes that the issue may be a violation of law, s/he must immediately contact the Chief Legal and Compliance Officer.

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

The Chief Legal and Compliance Officer, Nicole Kelsey, is available to help and provide guidance about workplace concerns. Please contact her at nkelsey@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 Chief Legal and Compliance Officer, Nicole Kelsey, at nkelsey@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 that a member of the ELT may be involved, our Compliance Hotline offers two 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. Anonymous reporting is available

where allowed by law, although providing your identity may assist the Company in investigating your concern.

- Report issues via our Company's hotline 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

Chief Legal & Compliance Officer: nkelsey@avitamedical.com

Compliance Hotline: 1-844-420-0044

Compliance Hotline from Australia: 1-800-768-120

Compliance Hotline from UK: 0-808-189-0041

Compliance Hotline from Germany: 0-800-183-0724

Compliance Hotline from Italy: 800 743 075

Website: www.lighthouse-services.com/avitamedical

Human Resources: nkelsey@avitamedical.com

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 Chief Legal and Compliance Officer or the SVP, Human Resources.

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 a violation of 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 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 Chief Legal and 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 will be conducted, and a written report summarizing the findings and conclusion as to whether an investigation is warranted will be prepared.
3. If an investigation is warranted, the Chief Legal and 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, which includes ensuring participation of parties who have the appropriate subject matter expertise and do not have conflicts of interest with the complainant. At the conclusion of the investigation, a written report to the Chief Executive Officer, and any relevant members of the ELT, 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/or our Company.
6. The ELT, and their respective managers, 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, through its Nominating and Corporate Governance Committee, provides oversight of this Code and is provided up-to-date reports of any compliance investigations, the conclusions of such investigations, and any disciplinary action taken.

Consequences of Violations

Employees will be held accountable for adherence to this Code in accordance with the terms hereof. 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 as well as referral of the matter to government authorities.

Waivers

Before an Employee, or an immediate family member of any such Employee, engages in any activity that would be otherwise prohibited by the Code, he or she is strongly encouraged to obtain a written waiver from the Chief Legal and Compliance Officer.

Before a director or officer (as defined under in Rule 16a-1(f) of the Securities Exchange Act of 1934), or an immediate family member of such person, engages in any activity that would be otherwise prohibited by the Code, he or she must obtain a written waiver from the Audit Committee of the Board. Such waiver must then be disclosed to the Company's shareholders, along with the reasons for the granting of the waiver.

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 patients' lives.

Diversity, Inclusion, 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 (including pregnancy, childbirth or related medical conditions), sexual orientation, gender identity and/or expression, religion, national origin, ancestry, physical or mental disability, veteran status, or any other characteristics protected by law (the "Protected Characteristics"). We do not tolerate discrimination or harassment on the basis of any of these Protected Characteristics. We adhere to various hiring and employment regulations, including but not limited to the Equal Employment Opportunity Act and the 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 Protected Characteristics. We will not tolerate discrimination or harassment by anyone, including by 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 use the Company's compliance reporting channels, as set forth under the section of this Code entitled "*Where Should I Report My Concern?*".

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 Protected Characteristics.

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 we 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.

Equal Employment Opportunity Practices

This Code sets out the Company's commitment to equal employment opportunities and harassment prevention in the workplace. It is the policy of the Company to provide equal employment opportunities to all qualified individuals and to administer all aspects and conditions of employment without regard to any Protected Characteristic, including any combination thereof, in accordance with applicable federal, state, and local laws. [The Company's Employee Handbook](#) 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 Employee have a shared responsibility in the promotion of health and safety in the workplace. You should follow all applicable health and safety laws and regulations, as well as Company health and 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.

In addition, the Company prohibits any use of alcohol or other intoxicants on Company premises, except at sponsored Company functions, with appropriate pre-approval. You may not use, possess, abuse or distribute illegal drugs or other controlled substances 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 or threats of 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, or whether it includes the destruction or defacing of property belonging to the Company, visitors, or Employees intentionally or unintentionally in the course of a threat or a violent act.

Employees of AVITA Medical should help to ensure that all of our locations (our headquarters in Valencia, our manufacturing facility in Ventura, our laboratory and office in Irvine, together with any other locations) 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 member of the ELT 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, discrimination, abuse, harassment, or any other human rights abuses. This commitment applies not only for our own workforce, but also to our third-party suppliers or other business partners that may be engaged in actions that would violate the Code. You should immediately report (through the Company's Supplier Code of Conduct, located on the Company's website) any violations of this policy using the resources described in this Code.

Comply with Environmental Laws and Regulations

We strive to reduce environmental impacts from our operations, products, and services where possible. We comply with environmental regulations and standards applicable to our operations to minimize environmental pollution and to contribute to environmental protection. Employees are encouraged to report conditions that they perceive to be unsafe, unhealthy or hazardous to the environment.

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 upholds its obligations. Equally, customers and suppliers need to be aware of the Company's standards and expectations regarding business conduct and ethics and should be encouraged to help uphold them.

Responsibility to Our Communities

The Company is privileged to do business in many communities around the world and must act responsibly in those communities. This means conducting operations within applicable legal and professional standards.

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 or privileged information, misrepresentation of material facts, fraud, or other unfair dealing practices. While the Company will compete for business aggressively, it will do so honestly and in accordance with our Company's compliance standards. 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 our 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 ELT 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. It is the personal responsibility of each Employee when taking any action on behalf of the Company to adhere to the standards and restrictions imposed by any applicable law or regulation. Specifically, under applicable securities laws, the Chief Executive Officer and Chief Financial Officer of the Company (together, the “Senior Financial Officers”) are also required to promote compliance by all Employees with the Code and to abide by Company standards, policies, and procedures.

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. Accordingly, the Company has a strict compliance with laws policy. This 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 whether in the U.S. or abroad. 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 Chief Legal and Compliance Officer 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 or divisions, limiting the production or sale of products, boycotting certain suppliers or customers, bid rigging, engaging in conduct that eliminates competition or otherwise unreasonably restrains trade, and other arrangements with competitors that are unlawful per se. Employees 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; revenues or 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 both the Company in the conduct of its business and market participants generally. 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 Chief Legal and Compliance Officer prior to implementation.

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

The U.S. Foreign Corrupt Practices Act (the “FCPA”) prohibits any individual or business in or from the United States from authorizing, offering or paying money or anything of value, directly or indirectly, to any foreign official or employee, political party, or candidate for public office for the purpose of obtaining or maintaining business or for any other business advantage. Violation of the FCPA could subject the Company and its individual directors, officers, Employees, and designated agents to serious civil and criminal penalties.

It is strictly prohibited to make illegal payments to government officials of any country. In addition, the promise, offer or delivery to an official or employee of the U.S. government of a gift, favor or other gratuity in violation of these rules would not only violate Company policy but could also be a criminal offense. State and local governments, as well as foreign governments, may have similar rules.

- 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, or 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 Chief Legal and Compliance Officer to be sure that you understand these laws before providing anything of value to a government official.
- d. 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 FCPA 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.

- e. Acts of bribery and corruption may well result in persons being exposed to criminal and civil liability.

Please see the sections of this Code entitled “Gifts & Entertainment to Customers and Vendors” and “Gifts & Entertainment to Government Officials” for additional information.

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

- ***Gifts, especially gifts beyond a nominal value (see the Company’s Gift Policy);***
- ***Entertainment, hospitality, services and/or travel beyond reasonable business needs;***
- ***Offers of employment, including internships;***
- ***Favors;***
- ***Awarding of contracts or business; and***
- ***Payments or benefits for services for an individual’s family members or acquaintances, including offers of employment.***

3. Economic Sanctions and Boycotts

All Employees and Company agents must know and comply with United States trade control laws and regulations (including export controls, sanctions, customs, and anti-boycott), as well as the trade control laws of other countries where the Company operates.

The United States, European Union member states, and many other jurisdictions implement economic sanctions measures or embargoes prohibiting exports, transactions, and other dealings with certain foreign countries, territories and persons, and prohibit cooperation with certain boycotts imposed by some countries against others. Some of these sanction measures are comprehensive, effectively 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 sanction 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. The Company does not engage in unauthorized dealings with sanctioned countries or parties, nor does it participate in prohibited boycotts or other illegal 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, export control, customs, and anti-boycott-related matters. Employees involved in export transactions or international operations must familiarize themselves with the list of countries against which the United States maintains comprehensive sanctions and the rules relating to exporting to or transacting with such countries, either directly or indirectly through foreign subsidiaries or other third parties.

Due to the complexities of these international trade laws, Employees should contact the Chief Legal and Compliance Officer before engaging in transactions with countries or persons that may be affected by economic or trade sanctions. If requested to participate in or cooperate with an international boycott that the United States does not support, you may not agree to or comply with such request. Immediately report this request to the Chief Legal and Compliance Officer.

4. 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 our Chief Legal and Compliance Officer 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 Chief Legal and Compliance Officer. If you have questions or concerns, contact our Chief Legal and Compliance Officer.

5. 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.

6. The Food, Drug and Cosmetic Act and Interactions with the Food and Drug Administration

The Company's products, product candidates, and operations are subject to extensive and rigorous regulation by the U.S. Food and Drug Administration (the "FDA") under the Federal Food, Drug, and Cosmetic Act (the "FFDCA") and its implementing regulations. The FDA regulates many areas of the Company's operations, including, but not limited to, the development, design, non-clinical and clinical research, manufacturing, safety, efficacy, labeling, packaging, storage, recordkeeping, premarket clearance or approval, adverse event reporting, advertising, promotion, marketing, sale, and distribution of our products. The FDA also regulates the export of products manufactured in the United States to international markets. Violation of these laws and regulations can have significant impacts on the Company and its products, including, among other things, severe civil and criminal penalties, adverse publicity for the Company, total or partial suspension of production of a Company product, withdrawal of a Company product from the market or restrictions on our ability to continue selling a Company product, and disciplinary action by the Company against the responsible individuals, up to and including termination of employment.

All Company Employees are required to review, understand, and comply with applicable laws and regulations. Employees are expected to have a thorough understanding of the laws, regulations, and other relevant standards applicable to their job positions, and to comply with those requirements. If any doubt exists regarding whether your job position or a particular course of action is governed by these laws and regulations, you should seek advice immediately from the Chief Legal and Compliance Officer.

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. However, federal and state contribution and lobbying laws severely limit the contributions the Company can make to political parties or candidates. Therefore, it is the Company's policy not to make any contributions to any political candidate or party or to any other organization that might use the contributions for a political candidate or party in such elections except with the prior approval of our Chief Legal and Compliance 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, and Employees must make every effort to

ensure that they do not create the impression that they speak or act on behalf of the Company with respect to political matters. 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. 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 Chief Legal and Compliance Officer.

Research & Educational Grants; Charitable Donations

The Company supports legitimate education, research, and charitable initiatives that advance patient care and medical innovation. All grants and donations must be reviewed by the Company's Grants and Donations Committee and approved through the procedures established under the [Grants and Donations Policy](#), aligned with fair market value principles, and must never be used to improperly influence clinical or purchasing decisions. Transparency, integrity, and compliance with the AdvaMed Code's ethical standards are mandatory.

Interactions with Healthcare Professionals

It is the responsibility of all 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 to ensure 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 all Employees to abide by the Policy on [Engaging with Healthcare Professionals](#), as well as this Code, the Advanced Medical Technology Association Code of Ethics on Interactions with Health Care Professionals (the "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.

The AdvaMed Code recognizes the obligation to facilitate ethical interactions between medical device companies such as the Company 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. The Company has adopted the AdvaMed Code to govern its marketing and promotional activities. The Company must ensure that interactions with HCPs are conducted in accordance with the AdvaMed Code.

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

The False Claims Act (the “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 the Company promotes or markets any of its products in an inappropriate manner, such as for a use or benefit that is not approved by the FDA. The 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 Federal Anti-Kickback Statute (and related state laws) (the “AKS”) prohibits offering, paying, or soliciting to, or receiving anything of value from, anyone in return for referring a product or to induce or reward patient referrals or for the generation of business involving any item or service payable by or reimbursed under a federal or state healthcare program. The phrase “anything of value” includes cash, discounts, gifts, excessive compensation, contracts not at fair market value, etc. Examples of prohibited AKS actions include an HCP who is compensated based on patient volume, or a provider who offers remuneration to patients to influence them to use their services. As such, all Employees are prohibited from offering, paying or soliciting anyone in exchange for recommending or purchasing the Company’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 HCPs: Business Meals

On occasion, a business meal 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 discussion and exchange of information. 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. Meals must not be part of an entertainment or recreational event. The Company has defined dollar amounts for meals and such expenses must be clearly marked in the Company’s 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 Program, as well as with the individual state marketing reporting requirements. 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 Employee(s) present. Employees may never give an HCP cash or cash equivalents (e.g., gift certificates, credit cards) to purchase a meal.

Provided that objective, legitimate reasons support the HCP's presence, the Company may provide modest and reasonable travel and lodging costs for an HCP (but not their family members or other guests) to attend Company or industry events related to the Company's products. Employees are required to follow the Company's [Travel & Expense Guidelines](#) when providing travel and/or lodging to HCPs.

In addition to reporting of HCP meals, the Company 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 HCPs: Education and Training

Education and training given to HCPs by 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 (e.g., at the Company's or HCP's facility). 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 on the training or educational purpose of the meeting. If there are objective reasons to support the need for out-of-town travel to efficiently deliver training and education on the Company's products or research related thereto, the Company may pay for reasonable travel and lodging costs of the attending HCPs. The Company may also pay for consulting hours as agreed upon in a fully executed agreement delivered by both parties.

Promotional presentations and communications with HCPs serve as an important function for the Company. When promoting the Company's 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 Marketing, Medical Affairs, Legal, and Regulatory Committee (the "M2LR Committee"). Employees must abide by the M2LR Review Policy and External Generated Material Policy.

4. Interactions with HCPs: Evaluation & Demonstration Products

The Company may provide demonstration, evaluation, and consigned products to healthcare institutions and HCPs to facilitate training, education, and appropriate product evaluation. Such provisions must be documented, time-limited, and consistent with fair market and ethical standards. These activities must not be used for promotional purposes or as inducements for business. All actions should comply with the AdvaMed Code and its transparency reporting requirements.

5. Interactions with HCPs: Coverage, Reimbursement & Health Economics

The dissemination of truthful and accurate reimbursement and billing information is critical in an ever-changing marketplace. It is important to ensure that the Company disseminate this information to HCPs and other healthcare institutions at the appropriate time. It is also important to note that published government and reimbursement guidelines in addition to certain third-party sources (e.g., American Medical Association (“AMA”), specialty society guidelines, commercial payer policies, etc.) may be used or employed when disseminating reimbursement and billing information.

The Company may not provide advice or opinion based on what other HCPs may be submitting on their claim forms or suggest what codes should be utilized for a specific claim. Any information provided should be backed by an appropriate, authoritative, published third-party source (e.g., Centers for Medicare and Medicaid Services, the Medicaid provider manual, the AMA, a specific payor policy, etc.). The Company may utilize materials approved through its M2LR Committee, including coverage decisions in a geographic market or jurisdiction, exhaustive lists of codes, or payer determinations.

The Company may provide accurate, objective, and transparent information to HCPs regarding coverage, coding, and reimbursement of its products to facilitate appropriate patient access. Such support must comply with the ethical standards established under the AdvaMed Code, federal and state regulations, and our applicable Compliance procedures. The Company must never provide reimbursement assistance as an inducement for business or interfere with the independent medical judgment of any HCP.

4. OUR RELATIONSHIP TO THE COMPANY AND TO STAKEHOLDERS

Ethics or compliance concerns can be reported to the Company's hotline provider Syntrio Lighthouse Services, at: www.lighthouse-services.com/avitamedical // 1 (844) 420-0044.

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 business and sales data, financial assets, business strategies or other strategic information, ideas, designs, databases, records, salary information, any unpublished financial data and reports, and other confidential or proprietary information), intellectual property (including our trademarks, patents, copyrights and trade secrets), and our reputation. You must protect the Company's assets from loss, damage, misuse, carelessness, 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 and reputation. 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 providing 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 and events of the Company, and, as applicable, conform both to generally accepted accounting principles ("GAAP") and the Company's system of internal controls for financial reporting. To that end, no undisclosed or unrecorded fund or asset shall be established for any purpose. No false or artificial entries that intentionally hide or disguise the true nature of any transaction 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 loss of employment or prosecution.

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 any concern about how to comply with a legal preservation or hold notice, please direct your concern to the Chief Legal and Compliance Officer.

If you have a concern regarding the Company's accounting, internal controls for financial reporting or other auditing matters, you should promptly report that concern to the Chief Financial Officer, copying the Chief Legal and Compliance Officer.

Full, Fair, Accurate, Timely, and Understandable Disclosure

The information in the Company's public communications, including in all reports and documents filed with or submitted to the U.S. Securities and Exchange Commission (the "SEC") and/or furnished to the Australian Securities Exchange, must be full, fair, accurate, timely, and understandable.

To ensure the Company meets this standard, all Employees (to the extent they are involved in the Company's disclosure or external reporting processes) are required to maintain familiarity with the disclosure requirements, processes, and procedures applicable to the Company commensurate with their duties. Furthermore, our accounting records must conform not only to our internal controls for financial reporting and disclosure procedures but also to GAAP and other laws and regulations, such as those of the U.S. Internal Revenue Service. Employees are prohibited from knowingly misrepresenting, omitting or causing others to misrepresent or omit, material facts about the Company to others, including the Company's independent auditors, governmental regulators, and self-regulatory organizations.

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 relating to the Company, or another company, and its operations that might be of use or helpful to competitors or harmful to the Company or its customers if disclosed. It may include, for example, the Company's proprietary technical information, strategic business plans (including proposed acquisitions or divestitures), customers, suppliers, financial information (including results or prospects), capitalization or contracts.

You must maintain the confidentiality of this information except where disclosure is authorized or legally mandated. This prohibition includes, but is not limited to, inquiries made by the press, analysts, investors or others. 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, strategic or proprietary nature concerning the Company. When an appropriately authorized Employee provides confidential, strategic 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 reviewed by our Chief Legal and Compliance Officer, or her designee. If you have questions about the confidentiality of information or the need for a confidentiality agreement, seek advice from our Chief Legal and Compliance Officer.

Protecting the confidential and personal information of our Employees and our customers is also of great importance. Anyone who handles such information must safeguard it by keeping it secure, limiting access to those who have a need to know in order to do their job, and avoiding discussion of it in public areas such as planes, elevators, and restaurants and on mobile phones. Additionally, you should never try to persuade others to violate the confidentiality of other companies or use such information for personal gain. Your responsibility to preserve confidential information continues even after your employment with the Company ends. Any Employee who suspects that the Company's confidential, strategic 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 the European Union under its General Data Protection Regulation, whereby a breach of such 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 legal in the European Union, its member countries, or 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. The Company's [Handling of Personal Data Policy](#) limits the access, use, and retention of personal data to what is strictly necessary to carry out business duties and Employees must comply with such limitations when interacting with personal data.

If you suspect in any case that an individual's personal data has been compromised, immediately report it to the Chief Legal and Compliance Officer or VP, Information Technology.

Intellectual Property

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

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 Chief Legal and Compliance Officer 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 recognizes the value that social media platforms can offer in building professional relationships and promoting external engagement. While the Company supports responsible participation in these platforms, it expects all AVITA Medical Employees, contractors, and field-based professionals to use sound judgment and act with integrity when referencing the Company or its business in any online setting, whether in a professional or personal capacity.

Only designated Authorized Spokespersons (as defined in the Company's [Social Media Policy](#)) are permitted to communicate on behalf of AVITA Medical through official Company social media channels. All other Employees must refrain from making public statements about the Company's business operations, financial performance, products, or services. Individuals must not imply they are speaking on the Company's behalf or share content that could reasonably be interpreted as such. Employees may reshare or engage with official Company content from AVITA Medical's social media channels, provided they do so in accordance with the Social Media Policy and use approved Company commentary only when applicable.

Employees must never disclose confidential or proprietary information, including material non-public information (MNPI), nor make promotional, comparative, or unsubstantiated claims about AVITA Medical's products or clinical data. Social media content that touches on safety, efficacy, or regulated claims may be subject to review by the Medical, Legal, and Regulatory (MLR) Team. Any interaction involving patients, colleagues, physicians, or competitors must be approached with discretion, professionalism, and adherence to the Company's confidentiality, privacy, and anti-harassment standards.

Use of social media in a manner that violates this Code or the Social Media Policy may result in disciplinary action, up to and including termination. Employees are encouraged to report any concerns to the Chief Legal and Compliance Officer or through the Company's compliance reporting channels. For detailed guidance on appropriate use and specific restrictions, Employees should consult the full Social Media Policy.

External Media Platforms

Be transparent and make necessary disclosures. Employees must disclose their association with the Company when posting on external social media platforms, including personal social media accounts. 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 official Company-sponsored content using their personal accounts, provided the original content is not altered and no unapproved commentary is added. However, Employees must not create their own posts about the Company, its products, services, operations, or business performance. They must also not re-share or endorse material relating to the Company that was created by parties external to AVITA Medical without prior written permission from the SVP, Global Marketing & Strategy. Employees may not comment on or endorse any physician, customer, or supplier through personal social media channels.

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 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 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 Policy by contacting our Chief Legal and Compliance Officer.

Conflicts of Interest

A conflict of interest occurs when a person's private interests interfere, or appear to interfere, with the interests of the Company. Each Employee must avoid engaging in any conduct or taking any actions that result in any actual or apparent conflicts of interest between personal and professional relationships. While this Code does not attempt to describe all possible conflicts of interest that could develop, a conflict of interest exists when an Employee's loyalty to the Company is affected by an actual or potential benefit or influence from an outside source.

A conflict of interest 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. While some conflicts of interest are obvious (for example, an Employee taking a Company business opportunity for their own financial benefit), other situations may be less clear. Below are some additional examples of common potential conflicts of interests:

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

If a person discovers a conflict of interest, or a situation that may reasonably be expected to involve a conflict of interest, the personal interests or other circumstances that might constitute such a conflict of interest must be reported promptly to our Chief Legal and Compliance Officer and the conflicted person must excuse himself or herself from participating in decisions or negotiations involving the possible conflict. Our Chief Legal and Compliance Officer 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 party transaction must be reviewed, and recommended for pre-approval by the Board, by the Board's Audit Committee.

Gifts & Entertainment to Customers and Vendors

The exchange of gifts and entertainment can play a role in strengthening relationships with customers, vendors, and other business partners. However, such exchanges must be handled with care to avoid any actual or perceived conflict of interest. Employees must always act fairly and impartially in business dealings, and gifts or entertainment must never compromise—or appear to compromise—objective decision-making.

Employees may only accept gifts of nominal value (equal to or less than \$10) from customers, vendors, or other business partners. If a gift exceeding the designated \$10 amount is offered, it should be declined or promptly reported to your manager and the Chief Legal and Compliance Officer. A gift or entertainment offering should never create a sense of obligation, influence a business decision, or be something that would embarrass the Company or its Employees if publicly disclosed.

All gift or entertainment expenses must be accurately recorded and reported in accordance with Company expense policies. If you are ever unsure whether a gift or entertainment is appropriate, seek guidance from your manager or the Chief Legal and Compliance Officer before proceeding.

Gifts & Entertainment to Government Officials

Gifts and entertainment provided to government officials are strictly prohibited under this Code and the [Company's Gift Policy](#), unless pre-approved in writing by the Chief Legal and Compliance Officer. Employees should be advised that gifts to government officials may violate the U.S. Foreign Corrupt Practices Act and other U.S. and foreign laws.

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,”* must also be followed.

If you are unsure whether a specific gift, entertainment or hospitality is permissible, or if the proposed recipient is a public official, contact our Chief Legal and Compliance Officer before proceeding.

AI Use

The Company's [AI Use Policy](#) provides guidelines for the compliant use of generative artificial intelligence (“AI”) in the workplace. The AI Use Policy (i) addresses how to use AI tools without compromising the Company's confidential data; (ii) requires human review of all work product made using AI tools; and (iii) outlines procedures for

reporting noncompliance with the AI Use Policy.

Managing this Code and Keeping It Current

The Company's Board is responsible for ensuring that the Company maintains a Code of Business Conduct and Ethics and that it has appropriate processes in place regarding reporting and investigation with respect to this Code.

Periodic Review and Supplements

Changes in laws and regulations that apply to our Company may require, encourage, or inspire changes to this Code from time to time, and the Company reserves the right to amend or supplement this Code and the matters addressed herein, without prior notice, at any 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, 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.