

## AVITA MEDICAL, INC.

### INSIDER TRADING POLICY

Effective as of November 5, 2025

#### INTRODUCTION

While performing your duties for AVITA Medical, Inc. (the “**Company**”) or AVITA Medical Americas, LLC (taken together, the “**Company Group**”) you may, at times, have information that is not generally available to the public about the Company, the Company Group, or “**Related Entities**” (as defined below). The Company has its securities listed on both The Nasdaq Stock Market (“**Nasdaq**”) in the United States and the Australian Securities Exchange (“**ASX**”) in Australia, and as a result of being a publicly listed company, the Company, as well as its “**Covered Persons**” (as defined below) must comply with certain United States federal and state securities laws as well as the Corporations Act of Australia, which collectively prohibit trading, or procuring others to trade, in the securities of a company while in possession of material nonpublic information or otherwise in breach of a duty of trust or confidence. They also prohibit anyone who is aware of material nonpublic information from providing this information to others who may trade.

Violating such laws and regulations can undermine investor trust, harm the reputation and integrity of the Company, and result in termination from the Company or even serious criminal and civil charges against the individual and the Company. The Company reserves the right to take such disciplinary or other measure(s) it determines in its sole discretion to be appropriate in any particular situation, including disclosure of wrongdoing to governmental authorities.

This Insider Trading Policy (this “**Policy**”) outlines the conditions governing your ability to conduct transactions (a) in the Company’s securities, and (b) in the securities of other companies whose securities may be impacted by nonpublic information obtained in the course of your employment by the Company Group (the “**Related Entities**”).

**It is your obligation to read, understand, and comply with this Policy.**

This Policy applies globally and is effective upon approval by the Company’s Board of Directors (the “**Board**”) following review and recommendation of the Audit Committee to the Board. The Policy will be reviewed and re-approved on a regular basis and, as part of the Audit Committee’s review process, this Policy will be updated as required to reflect appropriate legal and regulatory changes.

Should you have any questions regarding this Policy, please contact AVITA Medical’s Chief Legal and Compliance Officer, Nicole Kelsey, at [nkelsey@avitamedical.com](mailto:nkelsey@avitamedical.com).

#### PERSONS TO WHOM THIS POLICY APPLIES

This Policy applies to all Company directors, officers, and employees, as well as

contractors, temporary workers or other individuals retained by the Company Group, whether located in or outside of the United States, any members of their respective households as well as any of their family members, and any individuals or entities influenced or controlled by any such person, including any partnerships, corporations, limited liability companies or trusts (collectively, the “**Covered Persons**,” and each, a “**Covered Person**”). The Chief Legal and Compliance Officer may also determine from time to time that other persons who may have access to material nonpublic information due to their activities with the Company shall be subject to this Policy. Any persons so identified by the Chief Legal and Compliance Officer shall also be “Covered Persons” for purposes of this Policy. For purposes of this Policy, “officers” refer to those individuals who meet the definition of “officer” under Section 16 of the Securities Exchange Act of 1934, as amended (the “**Exchange Act**”).

Transactions of Covered Persons who are related to, residing with, or otherwise affiliated with you are treated for the purpose of this Policy as if they were undertaken by you or for your benefit. Accordingly, all references to “you” with regard to trading restrictions or pre-clearance procedures in this Policy also apply to such Covered Persons.

## **POLICY STATEMENT**

Unless otherwise permitted by this Policy, no Covered Person shall:

- purchase, sell, gift or otherwise transfer any security of the Company while in possession of material nonpublic information about the Company Group;
- purchase, sell, gift or otherwise transfer any security of any Related Entity, including a customer, supplier, business partner, or an economically-linked company, such as a competitor or peer company, while in possession of material nonpublic information obtained in connection with your employment by, or service to, the Company Group (to the extent there is a reasonable likelihood that such information would be considered important to an investor in making an investment decision about such Related Entity);
- directly or indirectly communicate material nonpublic information to anyone outside the Company Group unless in accordance with the policies and procedures regarding confidential information established by the Company Group; or
- directly or indirectly communicate material nonpublic information to anyone within the Company Group except on a need-to-know basis.

For purposes of the above:

“Securities” includes stocks, bonds, notes, debentures, options, warrants, equity, and other convertible securities, as well as derivative instruments.

### Purchase or Sale

“Purchase” and “sale” are defined broadly under U.S. federal securities law.

“Purchase” includes not only the actual purchase of a security, but also any contract

to purchase or otherwise acquire a security. "Sale" includes not only the actual sale of a security, but also any contract to sell or otherwise dispose of a security. These definitions extend to a broad range of transactions, including conventional cash-for-stock transactions, conversions, the exercise of stock options or warrants, puts, calls, pledging and margin loans, or other derivative securities.

#### Material Nonpublic Information (MNPI)

##### Materiality

"Material information" is that which would be considered important by a reasonable investor in deciding whether to buy, sell or hold the securities in question, or if the information is likely to have a significant effect on the market price of the security. Material information can be positive or negative and can relate to virtually any aspect of a company's business or to any type of security. Also, information that something is likely to happen in the future—or even just that it may happen—could be deemed material. Some examples of information that generally would be considered material may include (but are not limited to):

- earnings and earnings estimates;
- possible mergers or acquisitions;
- tender offers or dispositions;
- major new products or product developments;
- regulatory approval, the status of regulatory submissions, or the rejection of a product;
- communications sent to, or received from, the U.S. Food and Drug Administration;
- important business developments (such as developments regarding strategic collaborations, or pre-clinical data or trial results);
- research developments or any other important developments that may impact the Company's products or technologies;
- significant financing developments (including pending public sales or offerings of debt or equity securities);
- significant expansion or curtailment of operations;
- defaults on debt obligations;
- bankruptcies;
- cybersecurity or data security incidents;
- significant government investigation or regulatory action, litigation, or commercial disputes;
- important management or control changes; and
- trends or uncertainties which may have an impact on the Company Group or a Related Entity.

Regulators will scrutinize a questionable trade after the fact with the benefit of hindsight, so it is best always to err on the side of deciding that the information is material and not trade if in doubt. **If you are unsure whether information is material, you should assume that the information is material and not trade in or**

encourage others to trade in securities to which that information relates. You can also consult with the Chief Legal and Compliance Officer if you have any questions regarding the materiality of any nonpublic information you possess.

#### Nonpublic Information

The standard for assessing whether information is “nonpublic” or “inside” is whether the information is generally available to the public. Information is generally available to the public when it has been widely disseminated in a manner that makes it generally available to investors in compliance with U.S. securities law (e.g., through a public regulatory filing with the U.S. Securities and Exchange Commission (the “SEC”), by means of an official press release or a Regulation FD-compliant conference call). As an example, the circulation of rumors, even if accurate and reported in the media, does not constitute public dissemination that complies with U.S. securities law.

In addition, even after an appropriately disseminated public announcement, enough time still must have elapsed to permit the market to absorb and evaluate the information. Generally, the passage of two full trading days following release of the information to the public is a reasonable waiting period before such information is deemed to be public.

Examples of nonpublic information include, but are not limited to, information about the operations, products/services, pipeline, commercial activities, regulatory objectives, financial position, etc. regarding the Company that are not accessible to the public. All Covered Persons must maintain the confidentiality of the Company Group’s information for proprietary, competitive, security, and other business reasons, and to comply with applicable laws. **As with questions of materiality, if you are not sure whether certain information is public or “nonpublic,” you should assume that the information is nonpublic and treat it as confidential. The Chief Legal and Compliance Officer shall have sole discretion to decide whether information is “nonpublic” for purposes of this Policy.**

The laws and regulations concerning insider trading are complex, and Covered Persons are encouraged to consult with the Chief Legal and Compliance Officer to seek guidance prior to considering a transaction in securities.

If an individual is in possession of material nonpublic information when the individual’s employment terminates, the restrictions set forth under this Policy continue to apply until that information has become public or is no longer material.

#### **PROHIBITED TRANSACTIONS**

The Company has determined that there is a heightened legal risk and the appearance of improper or inappropriate conduct if persons subject to this Policy engage in certain types of transactions. Therefore, Covered Persons shall comply with the following policies with respect to certain transactions in the Company’s securities.

##### *Short Sales*

Short sales of the Company’s securities are prohibited by this Policy. Short sales are

sales of shares that the Covered Person does not own at the time of sale, or sales of shares against which the Covered Person does not deliver the shares within 20 days after the sale. In addition, Section 16(c) of the Exchange Act prohibits Section 16 reporting persons (i.e., directors, officers, and any 10% stockholders in the Company's securities (the "Section 16 Reporting Persons")) from making short sales of the Company's equity securities. Short sales generally evidence an expectation on the part of the seller that the securities will decline in value and have the potential to signal to the market a lack of confidence in the Company. In addition, short sales may reduce the seller's incentive to improve the Company's performance. For these reasons, short sales of Company securities are prohibited.

#### *Short-Swing Transactions by Section 16 Reporting Persons*

In addition to Section 16(c)'s prohibition directed specifically at Section 16 Reporting Persons noted above, Section 16(b) of the Exchange Act requires Section 16 Reporting Persons to comply with additional reporting obligations and limitations on short-swing transactions.

The practical effect of these provisions is that Section 16 Reporting Persons who make "matching" transactions of the Company's securities within a six-month period (e.g., a purchase within six months prior to a sale, or a sale within six months prior to a purchase) must disgorge all profits from such transactions to the Company whether or not they had knowledge of any material non-public information. The terms "purchase" and "sale" are construed under Section 16(b) to cover a broad range of transactions, including: acquisitions and dispositions of shares in tender offers; the receipt and granting of certain options; the acquisition or sale of convertible debt; and certain corporate restructurings and reorganizations. Purchases and sales by a Section 16 Reporting Person may be matched with transactions by any person (such as certain family members and related or controlled corporations and entities) whose securities may be deemed to be beneficially owned by the insider. Section 16 rules define "beneficial ownership" as having or sharing a direct or indirect pecuniary interest (the opportunity directly or indirectly to profit or share in the profit derived from a transaction in the securities) in the securities. Certain transactions (e.g., receipt of awards under the Company's equity incentive plan) may be exempted from Section 16(b).

**If you are a Section 16 Reporting Person, you must immediately report to the Chief Legal and Compliance Officer all transactions made in the Company's securities by you, any family members, and any entities that you control subject to this Policy. The Company requires same day reporting due to SEC requirements that certain insider reports be filed with the SEC by the second business day after the date on which a reportable transaction occurs.** Contact the Chief Legal and Compliance Officer for assistance with obtaining the required forms (generally, either a Form 3, Form 4, or a Form 5). Note that, although the Company is willing to assist Section 16 Reporting Persons in meeting their Section 16 reporting obligations, it is ultimately the responsibility of the Section 16 Reporting Person to comply with these requirements.

#### *Puts, Calls, or Other Derivative Securities*

Transactions in puts, calls, or other derivative securities involving the Company's equity securities, on an exchange, on an over-the-counter market, or in any other

organized market, are, in effect, a bet on the short-term movement of the Company's stock, and therefore, create the appearance that the Covered Person is trading based on material nonpublic information. Such transactions also may focus the Covered Person's attention on short-term performance at the expense of the Company's long-term objectives. Accordingly, such transactions are prohibited by this Policy.

#### *Hedging Transactions*

Hedging transactions involving the Company's securities, such as prepaid variable forward contracts, equity swaps, collars and exchange funds, or other transactions that hedge or offset, or are designed to hedge or offset, any decrease in the market value of the Company's equity securities, are prohibited by this Policy.

#### *Margin Accounts and Pledging of Securities*

Covered Persons are prohibited from pledging the Company's securities as collateral for a loan, purchasing the Company's securities on margin (i.e., borrowing money to purchase the securities), or placing the Company's securities in a margin account. If Company securities are held in a margin account or pledged as collateral, they may be sold without your consent under certain circumstances. As a result, a margin or foreclosure sale of Company securities could occur when you are otherwise in possession of material nonpublic information, which would violate this Policy.

#### *Trades Under Rule 10b5-1 Plans*

Rule 10b5-1 is an SEC rule that provides an affirmative defense against insider trading allegations for individuals who trade company stock through a pre-arranged plan. These plans, known as Rule 10b5-1 plans, enable future trades in securities to be scheduled at a time when a person is not in possession of material non-public information. However, as trading under such plans runs the risk of violating Australian laws regarding insider trading (including applicable ASX listing rules), **Covered Persons may not conduct trades in Company securities under Rule 10b5-1 plans.**

For the avoidance of doubt, nothing in this Policy is intended to limit the ability of an investment fund, venture capital partnership or other similar entity with which a Covered Person is affiliated to distribute Company securities to its partners, members, or other similar persons. It is the responsibility of each affected director and the affiliated entity, in consultation with their own counsel (as appropriate), to determine the timing of any such distributions, based on all relevant facts and circumstances, and applicable securities laws.

### **CLOSED TRADING WINDOW: PROHIBITION ON TRADING DURING BLACKOUT PERIODS**

No Covered Person may trade in Company securities, whether by purchase, sale, gift or other transfer when the Company's quarterly trading window is closed (this period is also known as a "blackout period"), unless otherwise permitted by this Policy. **The Company closes its quarterly trading window two weeks prior to the end of the last month of each of the Company's fiscal quarters. Quarterly trading windows remain closed through the second Nasdaq trading day following the release of the Company's quarterly or annual earnings.**

The Chief Legal and Compliance Officer has the right to impose or modify blackout periods at any time and for any reason. In addition, the Board, in its sole discretion, may approve additional blackout periods from time to time. For the avoidance of doubt, no Covered Person is permitted to trade or otherwise conduct transactions in Company securities during a closed quarterly trading window or other blackout period.

Moreover, you should note that consummating transactions in Company securities, even during an open trading window or otherwise outside a blackout period, does not protect you from insider trading violations if you are trading while otherwise in possession of material nonpublic information. Consequently, even if you're seeking to complete a transaction in Company securities during an open trading window, you must first be pre-cleared in accordance with this Policy through the procedures set forth under section "PRE-CLEARANCE OF TRANSACTIONS" below.

If you have any questions regarding the nature or timing of the Company's quarterly trading windows or blackout periods, please contact the Company's Chief Legal and Compliance Officer.

## **PRE-CLEARANCE OF TRANSACTIONS**

Before engaging in any transaction in Company securities, all Covered Persons must pre-clear their proposed transactions in accordance with the procedures set forth below.

A request for pre-clearance must first be submitted via e-mail (the "**Pre-Clearance Request**") to the Chief Legal and Compliance Officer to arrange a meeting to discuss the proposed transaction and whether pre-clearance will be granted (the "**Pre-Clearance Meeting**").

Your Pre-Clearance Request must contain the following:

- A complete description of your intended transaction (e.g., purchase, sale, gift, contribution), including the number of Company securities involved;
- The date and the stock exchange on which the intended transaction is proposed to occur;
- A request for a meeting to discuss pre-clearance, during which you will confirm that you are not in possession of any material nonpublic information; and
- A certification that you will not trade in Company securities should you later come into possession of material nonpublic information after pre-clearance is granted but before the proposed transaction is completed.

All Pre-Clearance Meetings must take place with (i) the Chief Legal and Compliance Officer or (ii) for employees below the Vice President level, such person designated by the Chief Legal and Compliance Officer. The Chief Legal and Compliance Officer, and the Chief Legal and Compliance Officer's designees, are designated as the Company's "**Pre-Clearance Officers.**"

During the Pre-Clearance Meeting, a decision will be made by the Pre-Clearance Officer as to whether pre-clearance will be granted with respect to the proposed transaction. The decision will be communicated by the Pre-Clearance Officer to you during the Pre-Clearance Meeting (the “**Pre-Clearance Decision**”). A grant of pre-clearance will remain valid until the end of the second trading day following the date of the Pre-Clearance Decision (the “**Pre-Clearance Window**”). The Pre-Clearance Officer shall have the sole discretion to decide whether to clear any contemplated transaction.

**If the transaction is not completed during the Pre-Clearance Window, or you become aware of material nonpublic information during the Pre-Clearance Window but before the transaction is completed, you may not complete the transaction and will need to make another request for pre-clearance in accordance with the foregoing procedures.**

Pre-clearance provided by the Pre-Clearance Officer does not constitute investment or legal advice by the Company that the proposed transaction complies with the law. None of the Company Group, the Pre-Clearance Officers or the Company Group’s other directors, officers, or employees will have any liability for any delay in reviewing, or refusal of, a request for pre-clearance. If pre-clearance is denied, the denial must be kept confidential and must not be disclosed to anyone.

## **ROLE OF THE CHIEF LEGAL AND COMPLIANCE OFFICER**

The Chief Legal and Compliance Officer is responsible for administering and implementing this Policy, as approved by the Board. This authority includes interpreting and waiving the terms of this Policy, to the extent consistent with its general purpose and applicable securities laws. The Chief Legal and Compliance Officer will keep a record of all Pre-Clearance Decisions made in accordance with this Policy. The Chief Legal and Compliance Officer may appoint designees to administer this Policy, and the Chief Financial Officer will administer this Policy as it applies to any trading activity by the Chief Legal and Compliance Officer.

## **INDIVIDUAL RESPONSIBILITY**

You have an ethical and legal obligation to maintain the confidentiality of information about the Company Group and to comply with the trading restrictions set forth in this Policy. In all cases, the ultimate responsibility for adhering to this Policy and avoiding improper conduct rests with you, and any action on the part of the Company, any Pre-Clearance Officer, or any other employee pursuant to this Policy does not constitute legal advice or insulate you from liability under applicable laws. Violating the laws referenced in this Policy can undermine investor trust, harm the reputation and integrity of AVITA Medical, and result in termination from the Company Group or even serious criminal and civil charges against the individual and the Company. In the event of a violation of this Policy, the Company reserves the right to take such disciplinary or other measure(s) it determines in its sole discretion to be appropriate in any particular situation, including, but not limited to, declaring you ineligible for future participation in the Company’s equity incentive plans, suspension or termination of your employment for cause, and disclosure of wrongdoing to the

relevant governmental authorities. If you are in possession of material nonpublic information when your service with the Company terminates, the restrictions set forth in the "POLICY STATEMENT" section above continue to apply until that information has become public or is no longer material.

#### **CERTIFICATION OF RECEIPT AND UNDERSTANDING OF AND COMPLIANCE WITH THIS POLICY**

All Covered Persons must certify, on a periodic basis, that they have received a copy of this Policy, that they read it and understand its contents, and that they agree to comply with its terms.

#### **LODGING/FILING POLICY WITH GOVERNMENT AGENCY**

This Policy will be lodged or filed with any government agency where the law in that particular jurisdiction requires it.