

CODE OF CONDUCT

22 June 2021 | Version 1.0

Pro Medicus Limited – Code of Conduct

Pro Medicus Limited (“Company”) has adopted the following code of conduct for directors and staff (“Employees”). All Employees are required and expected to read and understand this code and apply and uphold the code in the conduct of the company’s business activities.

The code is designed to promote and set the standards of responsibility and ethical conduct expected of employees. The code is managed by the company conduct officer who is a member of the company board.

Employees are expected to comply with relevant government laws and regulations.

Employees are expected to conduct the company’s business in an open, honest, fair and ethical manner and operate in the best interests of the company.

Employees are expected to avoid conflicts of interest between their personal and business lives. A conflict of interest is defined where personal and business interests compete. Potential conflicts of interest should be immediately be raised and discussed by the employee with the conduct officer.

Employees are not to give, seek or accept in connection with the company’s business any gifts or hospitality that could reasonably be construed as a bribe or improper inducement.

Employees are expected to treat those who they interact with in conducting their work with respect and courtesy.

Employees are expected to uphold the company’s confidentiality policy especially with respect to personal health information.

Employees are expected to uphold the company’s policies and procedures as detailed in the company policy and procedure manual.

Pro Medicus is a listed public company and has a duty to its shareholders to disclose information as required by relevant corporate authorities. Employees are required to ensure that, to the extent of their role and responsibility, such disclosures are accurate and timely and not divulged improperly.

Employees are expected to uphold the company’s share trading policy and which restricts trading to windows following fully informed announcements unless authorised specifically by the Chairman of the Board.

Employees should report any breach or suspected breach of the code of conduct to the conduct officer. The company will take appropriate action against any employee whose actions violate the code.