

GROUP CODE OF CONDUCT

21 March 2023 | Version 2.0

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.

At the heart of the code is the company’s values:

Service and Product Excellence

- We are committed to providing best-in-class, well-supported, stable products and services to our customers, enabling them to improve workflow and diagnoses, ultimately providing more efficient patient care
- We are committed to continuous improvement of our systems, products and services

Integrity and Trust

- We do the right thing for our people, customers and patients
- We do what we say we will
- We maintain confidentiality
- We commit to a culture that is inclusive, respectful, honest and transparent in all that we do

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 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, and help create an environment that is free from discrimination, harassment and bullying.

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 amended from time-to-time.

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 must also not disclose market sensitive information.

Employees are expected to uphold the company's share trading policy 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. For further information, please refer to the Whistleblower Protection Policy. The company will take appropriate action against any employee whose actions violate the code, up to and including termination of employment.