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AVITA Medical Compliance Program
Gifts Policy
(November 4, 2026)

Purpose

The exchange of gifts between outside parties and AVITA Medical employees may be necessary to build goodwill in business relationships.[1] However, the giving and receiving of gifts can also create a perception of conflict of interest that can undermine the integrity of our business relationships. Without clear guidelines, this practice could be subject to potential abuse.[2] AVITA Medical, Inc. ("AVITA Medical" or the "Company") sets specific limits on the types and value of gifts that may be accepted or given by AVITA Medical employees. This Gifts Policy is designed to ensure that all employees and contractors of AVITA Medical act in compliance with the rules and regulations applicable to our Company when giving or receiving gifts.

Scope

This Gifts Policy applies to the giving and receiving of Gifts (as defined below) by AVITA Medical employees and contractors, as well as any other person or entity acting on behalf of AVITA Medical at the direction of any AVITA Medical employee or contractor.

Definitions

- **Gift**: Any item, service, favor, or promise provided without direct compensation or contractual consideration that has monetary value. This includes, but is not limited to, promotional materials or other tangible items, meals, entertainment, travel, accommodations, or discounts. This definition does not include Internal Awards (as defined below), which are governed by the AVITA Medical Internal Awards Policy.

- **Customer**: An individual, entity, or organization that purchases or seeks to purchase goods or services from AVITA Medical. A Customer includes, but is not limited to, clients, partners, and stakeholders with whom AVITA Medical has had, currently has, or is seeking a business relationship; however, this term does not include HCPs (as defined below). This term encompasses both current and potential Customers, as well as those who have engaged in business with AVITA Medical in the past.

- **Vendor**: An individual, entity, or organization that furnishes, or that seeks to furnish, goods or services to or on behalf of AVITA Medical. A Vendor includes, but is not limited to, all related vendor entities, such as parent and subsidiary companies and other affiliated entities, and other groups of vendors under substantially similar fiscal or operational control. This term encompasses both current and potential Vendors, as well as those who have contracted with AVITA Medical in the past.

[1] See also the Company's Travel & Expense Policy (External Gifts and Rewards) (available on the Company's Intranet)
[2] Please refer to the Company's FY26 Code of Business Conduct & Ethics (Gifts & Entertainment to Customers and Vendors)

Giving Gifts

Giving Gifts to Health Care Professionals ("HCPs")

AVITA Medical employees and contractors may only provide HCPs with modest, appropriate educational items that benefit patients or serve a genuine educational function for HCPs. Other than medical textbooks or anatomical models, any such educational items provided to an HCP must have a fair market value of less than $100. To be clear, HCPs are not included in the definition of "Customer" as used in this Gifts Policy.

Other than modest and appropriate educational items, AVITA Medical employees and contractors may ***not*** provide Gifts to HCPs. For illustration purposes, AVITA Medical employees and contractors may ***not*** provide HCPs with the following:

- Items that an HCP (or any of his or her family members, office staff, or friends or acquaintances) can use for non-educational or non-patient-related purposes (e.g., office supplies, scrubs, a smart tablet or phone, a laptop, or other mobile device capable of personal use)
- Branded non-educational promotional items (even if the item is of minimal value) related to the HCP's work or of minimal benefit to that HCP's staff or patients (e.g., pens, notepads, mugs, and other items with a company or product name or logo)
- Gifts such as cookies, chocolate, candy, wine, flowers, gift baskets, holiday gifts, cash, or cash equivalents (e.g., gift cards)[3]

If you are unsure whether it is permissible to give a specific Gift to an HCP, please consult with the Chief Legal and Compliance Officer before proceeding.

Giving Gifts to Customers or Vendors

Giving Gifts to Customers or Vendors might be construed as an improper attempt to influence the business relationship. It is permissible for AVITA Medical employees and contractors to provide modest Gifts consistent with customary business practice, so long as what is provided:

- Cannot be construed as a bribe or payoff;
- Has a fair market value of $100 or less; and
- Does not violate applicable law.

All Gifts to Customers or Vendors should support the legitimate business interests of AVITA Medical and should be appropriate under the circumstances.[4]

Any Gifts given by an AVITA Medical employee or contractor to a Customer or Vendor must be pre-approved by that employee's or contractor's direct manager (such pre-approval request to be copied to the relevant member of the Executive Leadership Team).

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[3] This prohibition aligns with the code of conduct established by our industry's leading trade association; please see the AdvaMed Code of Ethics, Educational & Patient Benefit Items (Prohibition on Gifts)

[4] Please refer to the Company's FY26 Code of Business Conduct & Ethics (Gifts & Entertainment to Customers and Vendors)

Giving Gifts to Government Officials
Gifts provided to government officials are strictly prohibited, unless pre-approved in writing by the Chief Legal and Compliance Officer. It should be assumed that Gifts to government officials violate the U.S. Foreign Corrupt Practices Act (and other applicable U.S. laws), the U.K. Bribery Act, applicable European Union anti-corruption laws, and/or applicable anti-bribery laws in other jurisdictions. The U.S and other governments also have laws and regulations that restrict business gratuities that may be accepted by government officials. If you are not sure whether a specific Gift is permissible, or if the proposed recipient is a government official, contact our Chief Legal and Compliance Officer before giving any Gift or making any reference to a potential Gift.[5]

Accepting or Receiving Gifts

Accepting or Receiving Gifts from HCPs
In accordance with the AdvaMed Code of Ethics, all AVITA Medical employees and contractors must refrain from any actions that may create conflicts of interest or be interpreted as improperly influencing HCPs. To ensure that this standard of integrity is upheld, all AVITA Medical employees and contractors are strictly prohibited from directly or indirectly accepting any Gift from an HCP.

Accepting or Receiving Gifts from Customers or Vendors
AVITA Medical employees and contractors are prohibited from directly or indirectly accepting a Gift for themselves or on behalf of AVITA Medical unless it is of nominal value (equal to or less than $10). If an employee or contractor is offered or given anything of value exceeding $10 from any Customer or Vendor in connection with Company business, they should refrain from accepting any such Gift, alert their manager immediately, and report the offer to the Chief Legal and Compliance Officer.[6] In the event that the manager believes that acceptance of such Gift serves the best interests of AVITA Medical, the manager will contact the Company's Chief Legal and Compliance Officer to discuss an exception to this Gifts Policy.

Regardless of the amount, a Gift should ***not*** be accepted if it could:

- Create a sense of obligation
- Compromise your professional judgment
- Influence or be perceived to influence business decisions
- Potentially harm AVITA Medical's business or reputation, or
- Potentially harm the reputation of the professionals involved.

All Gifts from Customers or Vendors should support the legitimate business interests of AVITA Medical and should be appropriate under the circumstances. Our Code of Business Conduct and Ethics directs AVITA Medical employees and contractors to conduct all AVITA Medical business in accordance with our Company's

[5] Please refer to the Company's FY26 Code of Business Conduct & Ethics (Gifts and Entertainment to Government Officials)
[6] Please refer to the AVITA Medical Employee Handbook (Business Gifts) (available on the Company's Intranet)

strict ethical standards. Any Gift from a Vendor or Customer that is greater than $10 in value must be reported to the Chief Legal and Compliance Officer.[7]

Internal Awards

For all matters relating to gifts, awards, prizes, and other items of value given by the Company to its employees or contractors ("Internal Awards"), including tax treatment, reporting, approval requirements, gross-up eligibility, and compliance procedures, refer to the AVITA Medical Internal Awards Policy, which governs Internal Awards as a standalone companion to this Gifts Policy.

Exceptions

Exceptions to this Gifts Policy may only be made with the written approval of the Chief Legal and Compliance Officer.

Enforcement

Violation of this Gifts Policy may result in disciplinary action, up to and including termination of employment or engagement. Employees and contractors are encouraged to report any concerns or violations to the Chief Legal and Compliance Officer or through the Whistleblower Hotline by emailing reports@lighthouse-services.com or by calling (844) 420-0044.

[7] Please see the Company's FY26 Code of Business Conduct & Ethics (Gifts & Entertainment to Customers and Vendors)