



Code of Conduct

1. Introduction and Purpose

This Code of Conduct aims to:

- provide a framework of the principles for all Company officers, employees and agents for conducting business and fostering relations with shareholders, customers, the community and other stakeholders;
- promote a consistent understanding of, and approach to, the standards of ethical behaviour;
- raise awareness of acceptable and unacceptable behaviour, and through this endeavour to avoid any real or perceived misconduct.

A breach of this Code of Conduct by any of its Directors, officers, employees, contractors or agents, may be subject to disciplinary action, including termination of engagement by the Company, formal caution or demotion. References in this policy to “employees” include directors, officers, employees and agents of the Company.

2. Overview of Obligations

- The Company and its officers, employees and agents must act with honesty, integrity and fairness at all times in all aspects of their involvement with the Company.
- The Company and its officers, employees and agents must comply with the content and spirit of all laws and regulations which govern the operations and business of the Company and must conduct themselves in accordance with this Code of Conduct.
- The Company and its officers, employees and agents must not knowingly participate in any illegal or unethical activity.
- Officers, employees and agents of the Company must not enter into any arrangement or participate in any activity that would conflict with the interests of the Company or prejudice the performance of professional duties.
- Corrupt practices are unacceptable and all commercial transactions must be properly and accurately recorded.
- Officers, employees and agents of the Company must not do anything which would be likely to affect the Company’s reputation negatively.

3. Business Integrity and Professional Practice

Confidentiality

All employees must maintain the confidentiality of business information relating to the Company and third parties. Employees must not disclose anything publicly about the Company unless specifically approved by the Company Secretary or the Board of Directors of the Company.

Share Trading Policy

Before trading shares in the Company, employees should refer to the Share Trading Policy and consider whether this has any application. Officers and certain employees are prevented from trading CathRx securities while in the possession of price sensitive information and during set periods during the year. If necessary, employees should initially direct questions to the Company Secretary.

Use of Company Resources

Every employee has a responsibility to protect the Company's property and other tangible and intangible assets against any unauthorised use or damage. If an employee believes that theft, unauthorised use or damage is taking place in the workplace they must immediately report it to the Managing Director. Company property must not be removed, given away, lent or disposed of without authorisation from relevant management, or used for personal benefit or any other improper purpose.

Business Records

Business records can only be accessed, used and destroyed with authorisation and in accordance with approved Company policies and rules.

Corporate Funds

Every employee who has control of Company funds is personally responsible for them. Funds mean cash or other valuables such as airline tickets or corporate charge cards.

Gifts and Inducements

Employees from time to time entertain or are entertained and give or receive gifts during the course of their duties. Employees will not accept gifts or inducements, which could impair their judgement or be perceived to be a conflict of interest, bribe or inappropriate gift. Similarly, employees will not offer bribes or inappropriate payments for the purpose of acquiring, retaining, directing business, or receiving any kind of special or favoured treatment for the company.

IT Resources

The Company is concerned about the preservation of its IT security and the appropriate use of its computer hardware and software. Employees must use email and internet resources responsibly. The Company accepts that some non-business usage of email is appropriate. For this reason, the Company does not desire to prohibit the use of email for non-business use completely. Internet usage is permitted for work purposes and may be used for private purposes for limited periods. This privilege should not be abused. All email and internet access can and may be reviewed by Company management.

Internal Policies

Employees will comply with all Company policies, including the Share Trading Policy, and the Continuous Disclosure and Shareholder Communications Policy.

4. Employment Practices

Health and Safety

The Company aims to conduct its business activities in a manner consistent with applicable health, safety, and environmental laws and regulations to ensure the wellbeing of our employees, contractors, visitors, and customers.

The cooperation of all employees is required to ensure that the Company successfully fulfils its occupational health and safety obligations. Employees are responsible for:

- acting in a manner which protects their safety and that of other employees, visitors and the public;
- using and maintaining appropriate safety equipment provided by the Company;
- obeying any reasonable instructions and complying with any policy that applies to occupational health, safety and welfare at the workplace;
- promptly reporting to the manager or the Company Secretary any potential hazards, accidents and near-accidents, and injuries in the workplace and completing the relevant forms to detail the hazards, near-accidents and injuries.

Non Discrimination and Harassment

The Company is an equal opportunity employer which aims to provide a work environment free from discrimination, harassment and bullying. Employees must not discriminate against, harass or bully any other employees.

Improper Influence, Freedom of Association

No pressure is to be put on employees to influence their personal preferences in private or political matters.

Drugs and Alcohol

Illegal drugs are not acceptable or permitted in the workplace. Where prescription drugs, which are likely to affect performance or safety are involved, employees should notify your manager to ensure that safety and performance impact is properly managed. Whilst in the workplace, consumption of alcohol is not permitted.

5. Responsibilities to the Community

Environment

The Company aims to be an environmentally sustainable business and to protect the environment in which it operates.

Animal Welfare

The development of medical devices is a highly regulated process, controlled on an individual country by country basis. Government agencies enforce stringent efficacy and safety testing standards that must be attained before medical devices can be used on humans. These mandatory safety and efficacy standards include testing on non-human species. The Company seeks to minimise the number of tests it conducts involving animals. The Company's testing is regulated by legislation and includes oversight of tests by ethics committees responsible to ensure that the tests are justified on a technical and ethical basis and that any applicable facility complies with the applicable standards for conducting such tests.

6. Reporting breaches or potential breaches

It is every employee's responsibility to report any instances of wrongdoing, possible corruption, or breaches of trust or law.

Employees who have genuine suspicions of wrongdoing or potential breaches may report their concerns either personally or anonymously with a guarantee of anonymity, so far as due process will allow, to management or if necessary Mr Cameron Billingsley, the Company's General Counsel. All information supplied by the whistleblower will be treated with the strictest confidence. No employee will be disadvantaged or victimised for raising their concerns.