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CORPORATE COMPLIANCE PROGRAM AVITA HEALTH SYSTEM

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THE COMPLIANCE PROGRAM OF AVITA HEALTH SYSTEM

PURPOSE OF PROGRAM

It is Avita Health System's policy to ensure the highest level of compliance, business integrity and ethical conduct in its delivery of health care to patients. It is the responsibility of every Avita Health System employee, affiliated physician, health care professional, agent, and contractor to ensure compliance with all laws and regulations applicable to the provision of quality healthcare to patients, participation in federal healthcare programs, and contractual commitments entered into with third party payors. In this regard, Avita Health System has proactively identified conduct that creates the risk of fraud and abuse exposure, and has adopted policies and procedures designed to minimize such risk, and to identify, investigate, correct and report wrongdoing where required by law. To enhance its continued pledge of compliance and to better assist all employees and stakeholders (including physicians) in this area, the Governing Board and senior management of Avita Health System are committed to a comprehensive Corporate Compliance Program.

The Avita Health System Governing Board has the ultimate responsibility for approval and implementation of the Avita Corporate Compliance Program. For purposes of this program and this document, Galion Community Hospital, Bucyrus Community Hospital, Avita Ontario Hospital, Crawford County Shared Health Services d/b/a Avita Home Health & Hospice, Community Health Associates, North Central Ohio Family Care Center and all of their respective subsidiaries and affiliates, will be collectively referred to as "Avita Health System" or "System".

The purpose of Avita Health System's Compliance Program is to:

- Ensure that Avita Health System conducts itself in an ethical, honest and responsible manner.
- Promote the prevention, detection and resolution of conduct that does not conform to federal and state law, payer healthcare program requirements, or Avita Health System policies related to ethical business conduct.
- Define employee responsibility to comply with all applicable laws, regulations and policies governing Avita Health System.
- Establish accountability for compliance at the highest operational levels, and to promote a culture where ethical conduct is recognized, valued and exemplified.
- Ensure that all claims for payment submitted to patients and third parties are accurate and in conformance with applicable law and payment rules.
- Provide a process by which employees and stakeholders can report potential instances of fraud, waste and abuse without fear of retaliation.
- Define a process for investigating allegations of wrongdoing within the organization for appropriate identification, correction, and reporting to authorities where required by law.
- Provide guidance to management regarding the implementation of preventive measures to ensure compliance, including through continuing education, auditing, and periodic self-monitoring.
- Create a centralized source for information on corporate compliance and Avita Health System Compliance Program, including a source for guidance, assistance, and distribution of applicable federal and state regulations, statutes and guidance regarding the same.
- Minimize, through early detection and reporting, any potential loss arising from improper activities, as well as reduce Avita Health System's potential exposure to damages and penalties that might result from improper activities.

Avita Health System will always strive to comply with applicable law. This compliance is demonstrated through the adoption and implementation of policies and procedures governing ethical conduct. The framework of Avita Health System's Corporate Compliance Program is meant to encourage active participation by all employees in overall compliance.

SCOPE OF PROGRAM

The scope of Avita Health System's Corporate Compliance Program includes, among other things:

- Ensuring that all contracts for goods and services, including agreements or arrangements with physicians, vendors, suppliers, and competitors, comply with applicable law.
- Ensuring that joint ventures, partnerships, acquisitions, mergers, or affiliations undertaken by Avita Health System comply with applicable law.
- Ensuring that arrangements with physicians and physician organizations, including physician practice acquisitions, physician recruitment, physician employment, physician contracting, professional courtesy, and other financial and compensation arrangements with physicians and physician organizations comply with applicable law.
- Ensuring that relationships between employees, executives, Board members, and the Avita Health System comport with applicable requirements for tax exempt entities.
- Ensuring that all leases, rentals, bailments, consignments, and the use of System-owned or leased real estate, equipment, fixtures and supplies complies with applicable law.
- Ensuring that relationships with third parties, including vendors, suppliers, contractors, competitors, trade associations, political organizations, candidates, and elected officials are appropriate and comply with applicable law.
- Ensuring appropriate Medical Staff credentialing, quality assurance, and peer review processes are established, comply with applicable law and accreditation requirements, and are adhered to by the System's healthcare facilities.
- Ensuring that charitable contributions, grants, gifts, bequests, endowments and other forms of financial support are administered and reported appropriately and in accordance with the terms of such contributions, grants, gifts, endowments or bequests (if any), and applicable law.
- Ensuring that the provision of community benefit, including through the provision of community outreach services, charity care, indigent care, and medical debt collection practices uphold Avita Health System's charitable mission and comply with applicable law.
- Ensuring that educational conferences, travel and entertainment, including instances in which such benefits are offered by current or potential vendors, contractors, and suppliers, conform to ethical and legal standards.
- Ensuring proper claims submission and payment processes, including adherence to applicable billing and coding standards.
- Ensuring the preparation and submission of all Medicare and Medicaid cost reports comply with applicable law.
- Ensuring the preparation and filing of tax returns, reports, and the creation and maintenance of tax receipts and supporting documentation comply with applicable law.
- Ensuring that the System's referral relationships with other health care practitioners and entities, such as physicians, hospitals, home health agencies, nursing facilities, hospices, durable medical equipment vendors, dialysis providers, diagnostic testing facilities and pharmacies comply with applicable law.
- Ensuring that patient rights are upheld and that the System consistently delivers quality care to its patients.
- Ensuring accurate and complete documentation of goods and services rendered to patients, and that all services provided are medical necessary and appropriate.
- Ensuring that the System adheres to EMTALA and the HIPAA Privacy and Security Rules.
- Ensuring compliance with other healthcare and business ethics and standards, along with licensure, certification and accreditation requirements.
- Ensuring that gifts or other promotional items offered to patients are of nominal value and do not improperly induce patients in violation of applicable law.
- Ensuring compliance with the Surprise Billing Laws and Regulations applicable to Hospital services.

- Ensuring compliance with laws and regulations applicable to the delivery of professional services via telemedicine.

THE COMPLIANCE COMMITTEE AND THE CORPORATE COMPLIANCE & PRIVACY OFFICER RESPONSIBILITIES

The Compliance Committee, and its duly appointed Corporate Compliance & Privacy Officer, shall have primary responsibility for the overall administration of the Corporate Compliance Program.

The Compliance Committee

The Compliance Committee is appointed by the President and CEO of Avita Health System and is responsible for overseeing the implementation and ongoing operation of the Corporate Compliance Program. The Committee will be comprised of individuals whose backgrounds, experiences and areas of expertise are relevant to the Corporate Compliance Program. The Compliance Committee shall ensure that a continually effective Compliance Program exists and that the requisite policies, procedures and practices are in place and are properly communicated, monitored and enforced on an ongoing basis. The Committee will be representative of the affected functional disciplines within the organization. The President and CEO of Avita Health System shall serve as chair the Compliance Committee.

The Corporate Compliance & Privacy Officer

The Corporate Compliance & Privacy Officer is responsible for the administration and management of Avita Health System's Corporate Compliance Program.

The Corporate Compliance & Privacy Officer reports to the President/CEO of Avita Health System. Compliance concerns discovered by the Corporate Compliance & Privacy Officer that may involve the CEO can be reported, after consultation and approval from Avita Health System's legal counsel, directly to the Board of Directors.

It is the Corporate Compliance & Privacy Officer's responsibility to administer the Compliance Program on a day-to-day basis, to render directives in accordance with the Program, and to assist associates to perform their duties in compliance with the Program. The Corporate Compliance & Privacy Officer must interact closely with numerous employees in different departments within Avita Health System to ensure an overall understanding of and adherence to the Compliance Program. In this capacity, the Corporate Compliance & Privacy Officer must ensure that he/she is accessible to all employees of Avita Health System and maintains frequent and direct communication with senior management and the Avita Governing Board. Additionally, the Corporate Compliance & Privacy Officer must work closely with department heads to review the results of periodic medical record, billing and other audits and reviews, and to assess any revisions to existing practices necessitated by the results of these audits and reviews.

The Corporate Compliance & Privacy Officer shall have the authority to review all documents and other information relevant to compliance activities, including, but not limited to, patient records, billing files, policies and procedures, and contractual arrangements with employees, independent contractors, suppliers, agents, and employed and contracted physicians. Access to these records will enable the Corporate Compliance & Privacy Officer to better assess the organization's level of compliance, identify any potential weaknesses or exposures of a compliance nature, and readily investigate any reported instances of suspected noncompliance.

The specific responsibilities of the Corporate Compliance & Privacy Officer include the following:

- Developing and/or monitoring the educational and training materials and programs related to the Corporate Compliance Program, and ensuring that all employees have attended all required training sessions;
- Assessing the effectiveness of internal monitoring and auditing processes to ensure that risk areas are appropriately monitored on an ongoing basis, including among other things, accurate chart documentation, code selection and bill submission;
- Redirecting the internal monitoring and auditing processes in response to regulatory changes, newly identified investigatory targets and perceived weaknesses or exposures in the system's practices;

- Developing processes for employees to report suspected waste, abuse, fraud and other improprieties without fear of retaliation.
- Ensuring that independent contractors, vendors, suppliers and other relevant third parties, particularly those who furnish goods and services to Avita Health System and its patients, are made aware of the relevant requirements of the Compliance Program.
- Coordinating personnel issues with Medical Staff services staff and Avita Health System's Human Resources staff, including in ensuring that the National Practitioner Data Bank, Cumulative Sanction Report, licensure verifications, specialty certification verifications, Excluded Entities and Individuals Report, criminal background checks, credentialing reports, previous employer / Medical Staff reference checks, and other appropriate sources are utilized in screening potential employees, contractors, Medical Staff appointees, vendors and suppliers.
- Independently investigating and resolving, with the advice of counsel, reported or suspected concerns related to compliance, ethics and privacy; designing and coordinating internal investigations in response to reports of problems or suspected violations; and referring to senior management for appropriate corrective or disciplinary actions when indicated.
- Periodically revising the Compliance Program's processes in light of changes in Avita Health System's operations or operating practices and changes in applicable laws, rules and regulations.
- Reviewing employment contracts, independent contractor agreements, leases and other agreements, with the assistance of legal counsel, to ensure that they are in compliance with applicable laws and regulations.
- Establishing and overseeing the operation of a compliance hotline for receiving reports of suspected compliance concerns, monitoring the calls received by the hotline, and ensuring that all calls are appropriately investigated and resolved on a timely basis.
- Responding to internal and external inquiries regarding compliance, ethics and privacy.
- Preparing quarterly and periodic monitoring reports for the Compliance Committee and the Board. The reports shall, among other things, summarize the various activities undertaken in conjunction with the Compliance Program and the results of the ongoing monitoring and auditing processes.
- Developing an annual compliance work plan outlining the compliance topics and areas of focus for the calendar year. The work plan shall be developed in consultation with the Compliance Committee.

CODE OF CONDUCT

The Board of Directors of Avita Health System has adopted a Code of Conduct, attached hereto as Exhibit A, to assist all Board members, officers and employees in avoiding both the fact and appearance of improper activities. Adherence to compliance policies and procedures and ethical principles is an element in evaluating performance, and non-adherence will result in disciplinary action. Failure to comply with the compliance policies of Avita Health System, either through commission or omission, could result in termination or other disciplinary action as set forth in the Human Resources policies of Avita Health System.

An employee's business decisions and behavior while employed by Avita Health System shall be governed by the System's Code of Conduct, and as applicable, the ethical standards dictated by the employee's respective professional standards of licensure and/or certification. It is each employee's responsibility to be familiar with those standards and be sensitive to any situations that would violate them or cause the appearance of a violation. Claims of ignorance, good intentions or bad advice will not be tolerated or accepted as excuses for noncompliance.

Reporting
It is the policy of Avita that no employee shall be punished solely on the basis that he or she reported in good faith what was reasonably believed to be an act of wrongdoing or a violation of the system's Corporate Compliance Program. However, an employee will be subject to disciplinary action, potentially termination, if the System reasonably concludes that a report of wrongdoing was knowingly fabricated, retaliatory, distorted, exaggerated or minimized to either injure someone else or to protect others, including the employee making the report, or otherwise not made in good faith. An employee whose report of potential misconduct contains admissions of personal wrongdoing will not be guaranteed protection from potential disciplinary action. The weight to be given to the self-reporting will depend on all the facts known to Avita Health System at the time a disciplinary decision, if any, is made by the appropriate personnel. An individual reporting known or suspected improper conduct is not required to identify him/herself. Anonymous calls and communications will be investigated and acted upon in the same manner as calls where the caller or writer reveals his/her identity.

Special Duties for Avita Health System Managers and Supervisors
The leadership of Avita Health System must make sure that the employees they supervise understand and comply with the high standards of ethical conduct at Avita Health System. Managers are responsible for ensuring that personnel attend all mandatory educational programs in order to familiarize themselves with matters relating to the Corporate Compliance Program. Directors, managers and supervisors, in addition to other employees, must be periodically trained in new compliance policies and procedures. In particular, all leadership personnel involved in the coding, claims and cost report development process should:

- Discuss with all supervised employees the compliance policies and legal requirements applicable to their function;
- Inform all supervised personnel that strict compliance with these policies, procedures and requirements is a condition of employment; and
- Disclose to all supervised personnel that Avita Health System will take disciplinary action, up to and including termination or revocation of privileges, for violations of these policies and requirements.

Managers and supervisors will be sanctioned for failure to adequately instruct their subordinates or for failing to detect noncompliance with applicable policies and legal requirements where reasonable diligence, on the part of the manager or supervisor, would have led to the discovery of potential problems and would have allowed Avita Health System the opportunity to make corrections earlier.

Sanctions for Non-Compliance

Common sense, good business judgment and acceptable personal behavior are expected of each Avita Health System employee. Non-compliance may subject violators to sanctions, and intentional or reckless non-compliance will subject violators to significant sanctions. Such sanctions will range from oral warnings to suspension or termination of employment, reprimand, suspension or revocation of Medical Staff privileges (subject to applicable peer review procedures), or termination of contractual relationships, as appropriate. Disciplinary action will be taken where an employee's failure to detect a violation is attributable to his or her negligence or reckless conduct. Disciplinary actions will be undertaken in accordance with the health system's established disciplinary processes and procedures.

VOLUNTARY REPORTING MECHANISMS
Avita Health System takes all reports of non-compliance seriously. The purpose of voluntary disclosure is to provide a mechanism whereby employees and agents of the system are able to report matters that may be unprofessional, unethical, illegal or potentially non-compliant without the fear of retribution.

Reports may be made in the following manner:

- Orally, and anonymously if so desired, through the Compliance Hotline.
- In writing, and anonymously if so desired, through healthcare facility mailbox, US mail, or e-mail to the Corporate Compliance & Privacy Officer, supervisors, legal counsel, the President/CEO or the Governing Board.
- In person, through the Corporate Compliance & Privacy Officer, supervisors, legal counsel, the President/CEO, or the Governing Board.

If a reporter is not complicit in any wrongdoing and requests anonymity, the Compliance/Ethics & Privacy Officer will attempt to keep their identity confidential, however, there is no guarantee that confidentiality can or will be maintained.

The Corporate Compliance & Privacy Officer shall thoroughly investigate all reported instances of alleged non-compliance. In making such investigation, the Corporate Compliance & Privacy Officer may consult with legal counsel and shall have such reasonable support and resources necessary to thoroughly review the facts underlying the allegation. Upon completion of the investigation, the Corporate Compliance & Privacy Officer will report his/her findings in writing to the CEO and to the Compliance Committee. In addition, the results of such investigation will be conveyed to the individual who made the report, if that individual is known to the Corporate Compliance & Privacy Officer.

REGULAR REVIEW OF COMPLIANCE PROGRAM EFFECTIVENESS

An integral part of Avita Health System's Compliance Program is the ongoing auditing and monitoring of the documentation practices, billing practices, coding practices, and processes in departments that demonstrate adherence to the Compliance Program. Auditing and monitoring procedures enable Avita Health System to continually assess the Compliance Program's effectiveness while ensuring compliance with applicable laws, regulations, policies and procedures.

The Corporate Compliance & Privacy Officer will perform, or cause to be performed through the engagement of outside consultants and experts through Legal Counsel, annual random internal compliance audits in the key functional areas that are in the scope of this program. Reports outlining the results of these audits will be provided to the CEO and to the Compliance Committee, and summarized in the Board's monitoring report.

As part of the review process, the Corporate Compliance & Privacy Officer, leadership, or designated qualified reviewers may utilize the following techniques:

- On site visits;
- Interviews with personnel involved in management, operations, coding, charge description master maintenance, claim development and submission, patient care, and other related activities for their input about the types of billing issues encountered and the types of complaints received from customers;
- Questionnaires developed to solicit impressions of a broad cross-section of employees and staff;
- Reviews of medical and financial records and other source documents that support claims for reimbursement and Medicare cost reports;
- Reviews of written materials and documentation prepared by the different divisions including contracts and other relevant documents.

The data should be sufficient for the reviewer to determine if the sample of services were:

- Reasonableness and medical necessity of services rendered.
- Whether care is delivered in the appropriate setting,
- Whether services have been coded and reported correctly on its claim, and
- Whether the services are appropriately documented.

The reviewers will have access to all existing audit and healthcare resources, relevant personnel and all relevant areas of operation. Avita Health System management will take whatever steps are necessary to correct past problems and prevent them from recurring.

SANCTION BACKGROUND CHECKS OF NEW EMPLOYEES & ANNUAL CERTIFICATION OF NO ADVERSE ACTIONS

A reasonable and prudent background investigation, including reference checks, will be performed as part of the employment process for all new Avita Health System employees. In addition, as a requirement of Ohio Board of Pharmacy licensing rules and regulations, and Medicare enrollment rules: (i) all Avita Health System Board members, officers and employees with direct access to drug stocks (including health professionals); and (ii) all Avita officials who are designated as managing employees for Medicare enrollment purposes and who execute applicable Medicare enrollment forms, updates and revalidations on the System's behalf; will

be required annually to certify with respect to their criminal background, licensure enforcement, and DEA enforcement status. The system's Compliance Program prohibits the employment of individuals who are listed as sanctioned, debarred, excluded or otherwise ineligible for participation in federal healthcare programs. With regard to current employees or independent contractors, a debarment or exclusion will result in immediate termination of employment, or alternatively, termination of the contractual relationship between Avita Health System and the contractor.

COMPLIANCE TRAINING AND EDUCATION

The proper education and training of corporate officers, managers, employees, physicians and other healthcare professionals, and the continual retraining of personnel at all affected levels, is a major element of Avita Health System's Compliance Program. As such, Avita Health System will periodically require affected personnel to attend specific training, including training and education in federal and state statutes, regulations and guidelines, the policies of private payors, and training in corporate ethics.

New employees will be educated about the Compliance Program during the employment/orientation process and are required to review the Compliance Program annually. Employees will be informed and educated periodically of applicable laws, regulations, and standards of business conduct that employees are expected to follow. Employees will also be advised of the consequences, both to the employee and to Avita Health System, should violations of such requirements occur.

In addition, targeted training will be provided to corporate officers, managers and other employees of Avita Health System whose duties involve high risk areas, including relationships with potential referral sources (including physicians), and those whose decisions may affect the accuracy of claims submitted to the government, such as employees involved in the coding, billing, cost reporting and marketing processes. Directors of specific departments must assist in the areas that require training, as well as conduct the training sessions for the individuals they supervise. Training instructors may come from outside or inside Avita Health System. Any formal training undertaken by Avita Health System as part of the Compliance Program will be documented.

REPORTING MISCONDUCT TO GOVERNMENTAL AUTHORITIES

If the Corporate Compliance & Privacy Officer, Compliance Committee or management personnel discover credible evidence of misconduct, as determined by legal counsel, and after reasonable inquiry there is reason to believe that the misconduct may violate criminal, civil or administrative law, then Avita Health System will promptly report the existence of misconduct to the appropriate governmental authority within applicable regulatory deadlines as applicable, or alternatively, within a reasonable amount of time. All Avita Health System employees and affiliates should be aware that the reporting of credible evidence of misconduct to the government may be required pursuant to law or is considered a mitigating factor by the government in determining sanctions if Avita Health System or an Avita Health System employee or affiliate becomes the target of an investigation. If, and when, a determination to report misconduct to the government is made, the Corporate Compliance & Privacy Officer, with the advice of counsel, will do so in a manner consistent with Avita Health System's interests and legal obligations.

RETENTION OF RECORDS

Legal and regulatory practice require the retention of certain records for various periods of time, particularly in the patient health, tax, personnel, health, safety, environment, contract and corporate structure areas. In addition, when litigation or a government investigation or audit is pending or imminent, relevant records must not be destroyed until the matter is closed. Therefore, the disposal or destruction of Avita Health System's records and files may be undertaken only as permitted pursuant to the System's Record Retention Policy.

All records necessary to protect the integrity of Avita Health System's Compliance Program will be maintained by the Corporate Compliance & Privacy Officer or designated employee.

EXHIBIT A

CODE OF CONDUCT

PURPOSE

This Code of Conduct has been adopted by the Governing Board of Avita Health System ("Avita") to provide standards by which its workforce members will conduct themselves in order to protect and promote system-wide integrity and to enhance Avita's ability to achieve its charitable purposes to serve the patients located within its service area.

INTRODUCTION

This Code of Conduct contains principles articulating the policy of Avita to promote its commitment to compliance, and Standards that are intended to provide additional guidance to persons functioning in managerial or administrative capacities. In addition, the Governing Board has adopted separate Compliance Policies that are intended to identify and address specific areas of risk to Avita.

This Code of Conduct will be distributed periodically to all workforce members, including employees, Board members, officers, volunteers, medical staff members and, where appropriate, contractors and other agents. All employees are responsible to ensure that their behavior and activity is consistent with the Code of Conduct.

As used in this Code of Conduct, the term "Avita" means Avita Health System and each of its affiliated hospitals, divisions, subsidiaries and operating or business units. The terms "officer," "director," "employee," "contractor", "work force member", and "volunteer" include any person who fills such a role or provides services on behalf of Avita or any of its hospitals, divisions, subsidiaries, and operating or business units.

STANDARDS

The following Standards are intended to provide guidance to work force members and management in administrative positions to assist them in their obligation to comply with applicable laws. These standards are neither exclusive nor complete. Work force members are required to comply with all applicable laws, whether or not specifically addressed in these policies. If questions regarding the existence, interpretation or application of any law arise, they should be directed to the Corporate Compliance & Privacy Officer.

1. LEGAL COMPLIANCE: AVITA WILL ENSURE THAT ALL ACTIVITIES UNDERTAKEN BY THE ORGANIZATION ARE IN COMPLIANCE WITH APPLICABLE LAW

Fraud and Abuse. Avita expects its work force members to refrain from conduct which may violate state and federal health care fraud and abuse laws. These laws prohibit, among other things: (1) direct, indirect or disguised payments in exchange for the referral of patients; (2) the submission of false, fraudulent or misleading claims to any government entity or third party payor, including claims for services not rendered, claims which characterize the service differently than the service actually rendered, duplicative claims, claims for services that are not medically necessary, or claims which do not otherwise comply with applicable program or contractual requirements; (3) making false representations to any person or entity in order to gain or retain participation in a program or to obtain payment for any service; and (4) accepting the referral of patients for the furnishing of designated health services from a physician with whom Avita has a financial relationship (including with the physician's immediate family members) unless an applicable regulatory exception applies under the Physician Self-Referral Statute (the "Stark" Law).

Tax-Exempt Status. As a nonprofit and tax-exempt entity, Avita has a legal and ethical obligation to act in compliance with applicable laws and to engage in activities in furtherance of its charitable purposes, and to ensure that its resources are used in a manner which furthers the public good rather than the private or personal interests of any individual. Consequently, Avita and its employees will avoid private inurement, compensation arrangements in excess of fair market value, will accurately report payments to appropriate taxing authorities, and will file all tax and information returns in a manner consistent with applicable laws.

Antitrust. All work force members must comply with applicable antitrust and similar laws which regulate competition. Examples of conduct prohibited by such laws include (1) agreements to fix prices, bid rigging, collusion (including price sharing) with competitors; (2) boycotts, certain exclusive dealing and

price discrimination agreements; and (3) unfair trade practices including bribery, misappropriation of trade secrets, deception, intimidation and similar unfair practices.

Lobbying & Political Activity. Avita expects each of its work force members to refrain from engaging in activities which may jeopardize the tax-exempt status of the organization, including a variety of lobbying and political activities.

Consultation with Legal Counsel. Work force members are expected to contact their supervisors / Avita reporting representatives when confronted with business decisions involving any of the above-listed or any other legal-related issues. Avita leadership will determine when it is necessary to engage and seek advice from Avita's legal counsel.

2. BUSINESS ETHICS: AVITA WILL NOT ENGAGE IN ANY ACTIVITY OR SCHEME INTENDED TO DEFRAUD ANYONE OF MONEY, PROPERTY OR HONEST SERVICES

The Standards set forth below are designed to provide guidance to ensure that Avita's business activities reflect high standards of business ethics and integrity.

Honest Communication. Avita requires candor and honesty from individuals in the performance of their responsibilities and in communication with our attorneys, consultants and auditors. No work force member shall make false or misleading statements to any patient, person or entity doing business with Avita, about other patients, persons or entities doing business or competing with Avita, or about the products or services of Avita or its competitors.

Misappropriation of Proprietary Information. Avita work force members shall not misappropriate confidential or proprietary information belonging to Avita or another person or entity, nor utilize any publication, document, computer program, information or product in violation of a third party's interest in such product. All Avita work force members are responsible to ensure they do not improperly copy for their own use documents or computer programs in violation of applicable copyright laws, patents, or licensing agreements. Work force members shall not utilize proprietary confidential business information obtained from competitors, including customer lists, price lists, contracts or other information in violation of a confidentiality / non-disclosure obligation or agreement, a covenant not to compete, prior employment agreements, or in any other manner likely to provide an unfair competitive advantage to Avita.

3. CONFIDENTIALITY & PATIENT RIGHTS: AVITA WORK FORCE MEMBERS SHALL MAINTAIN THE CONFIDENTIALITY OF PATIENT AND OTHER CONFIDENTIAL INFORMATION IN ACCORDANCE WITH APPLICABLE LEGAL STANDARDS, AND SHALL ENSURE THAT ALL PATIENTS ARE TREATED WITH DIGNITY AND RESPECT.

Avita and its work force members are in possession of, and have access to, a broad variety of confidential, sensitive and proprietary information, the inappropriate release of which could be injurious to patients, Avita's business partners and Avita itself. Every Avita work force member has an obligation to actively protect and safeguard confidential, sensitive and proprietary information in a manner designed to prevent the unauthorized disclosure of such information.

Patient Information. All Avita work force members have an obligation to conduct themselves in accordance with the principle of maintaining the confidentiality of patient information in accordance with all applicable laws and regulations, including HIPAA. Work force members shall refrain from revealing any personal or confidential information concerning patients unless supported by legitimate business or patient care purposes and in accordance with law. If questions arise regarding an obligation to maintain the confidentiality of information or the appropriateness of releasing information, work force members should seek guidance from the Corporate Compliance & Privacy Officer.

Proprietary Information. Information, ideas and intellectual property assets of Avita are important to organizational success. Information pertaining to Avita's competitive position or business strategies, payment and reimbursement information, and information relating to negotiations with employees or third parties should be protected and shared only with work force members having a need to know such information in order to perform their job responsibilities. Work force members should exercise care to ensure that intellectual property rights, including patents, trademarks, copyrights and software is carefully maintained and managed to preserve and protect its value.

Personnel Actions/Decisions. Salary, benefit and other personal information relating to employees shall be treated as confidential. Personnel files, payroll information, disciplinary matters and similar information shall be maintained in a manner designed to ensure confidentiality in accordance with applicable laws. Employees will exercise due care to prevent the release or sharing of information beyond those persons who may need such information to fulfill their job function.

4. CONFLICTS OF INTEREST: BOARD MEMBERS, OFFICERS, AND KEY EMPLOYEES MAY NOT USE THEIR POSITIONS TO PROFIT PERSONALLY OR TO ASSIST OTHERS IN PROFITING IN ANY WAY AT THE EXPENSE OF THE ORGANIZATION.

All Avita Board members, officers, and key employees ("covered persons") are expected to regulate their activities so as to avoid actual impropriety and/or the appearance of impropriety on the business decisions of Avita which might arise from the influence of those activities, or from disclosure or private use of business affairs or plans of Avita.

Outside Financial Interests. While not all inclusive, the following will serve as a guide to the types of activities by a covered person, or family member of such person, which might cause conflicts of interest: (a) Ownership in or employment by any outside concern which does business with Avita. (This does not apply to stock or other investments held in a publicly-held corporation, if the value of the stock or other investments does not exceed 5% of the publicly-held corporation's stock); (b) Conduct of any business not on behalf of Avita, with any vendor, supplier, contractor, or agency, or any of their officers or employees; (c) Representation of Avita by a covered person in any transaction in which he or she or a family member has a substantial personal interest; (d) Disclosure or use of confidential, special or inside information of or about Avita, particularly for personal profit or advantage of the covered person or a family member; and (e) Competition with Avita by a covered person, directly or indirectly, in the purchase, sale or ownership of property or property rights or interests, or business investment opportunities.

Services for Competitors/Vendors. No covered person shall perform work or render services for any competitor of Avita, or for any organization with which Avita does business or which seeks to do business with Avita, outside of the normal course of his/her employment with Avita without the approval of the President and Chief Executive Officer of Avita or the person's supervisor. Nor shall any such employee be a director, officer, or consultant of such an organization, nor permit his/her name to be used in any fashion that would tend to indicate a business connection with such organization.

Participation on Boards. A covered person must obtain approval from his/her supervisor prior to serving as a member of the Board of Directors of any organization whose interests may conflict with those of Avita. A covered person must disclose all Board activities in the annual Conflict of Interest disclosure statement.

Honoraria. Employees (includes Physicians and Advanced Practitioners) may, with the prior review and approval of their department's Senior Executive, participate as faculty and speakers at bona fide educational programs and functions, provided that such activities generally meet the following guidelines:

- the speaking activity does not unreasonably interfere with the employee's duties to Avita.
- the speaking activity must be at a bona fide event for the promotion of educational knowledge within the speaker's area of expertise and/or experience which presents valuable, new or novel information to the attendees;
- the speaker certifies that he or she has or will personally create the presentation to be provided at the event, and will not rely significantly on the event sponsor or another third party to create the presentation for them;
- the speaking activity results in the awarding of continuing education credits upon participants of the program;
- the speaking program is held at an appropriate location which is reasonably conducive to the exchange of information and learning for the participants (Note: subject to the individual facts and circumstances, speaking engagements which occur at high end resorts, at locations outside of the United States, or at high end restaurants or sporting venues, may not meet this requirement); and

- compensation offered to the employee for participating in the activity, including without limitation, speaking fees and the costs of travel and related expenses which are covered or paid by the sponsor, must be commercially reasonable, comport with fair market value, and cannot take into account the volume or value of past or anticipated referrals, or the value or anticipated value of other business generated for the persons or entities sponsoring the speaking engagement.

Employees who engage in speaking activity must obtain prior approval for each separate engagement they wish to accept, even in circumstances in which the activity has been approved in the past.

5. BUSINESS RELATIONSHIPS: BUSINESS TRANSACTIONS WITH VENDORS, CONTRACTORS AND OTHER THIRD PARTIES SHALL BE TRANSACTED FREE FROM OFFERS OR SOLICITATION OF GIFTS AND FAVORS OR OTHER IMPROPER INDUCEMENTS IN EXCHANGE FOR INFLUENCE OR ASSISTANCE IN A TRANSACTION.

The Standards set forth below are intended to guide key employees in determining the appropriateness of the listed activities or behaviors within the context of Avita business relationships, including relationships with vendors, providers, contractors, third party payors and government entities. It is the intent of Avita that this policy be construed broadly to avoid even the appearance of improper activity. If there is any doubt or concern about whether specific conduct or activities are ethical or otherwise appropriate, you should contact your supervisor, Avita's legal counsel, or the Corporate Compliance & Privacy Officer.

Gifts and Gratuities. It is Avita's desire to at all times preserve and protect its reputation and to avoid the appearance of impropriety. Consequently, the following standards shall be followed.

(a) Gifts from Patients or Families. Employees are prohibited from soliciting or accepting tips, personal gratuities or gifts from patients or their families. If an employee is offered a gratuity or other gift, the employee may direct patients and their families to Avita's Foundation Office to make a charitable donation to the System.

(b) Gifts Influencing Decision-Making. Employees shall not accept gifts, favors, services, entertainment or other things of value to the extent that decision-making or actions affecting Avita might be influenced. Similarly, the offer or giving of money, services or other things of value with the expectation of influencing the judgment or decision-making process of any purchaser, supplier, customer, government official or other person by Avita is absolutely prohibited. Any such conduct must be reported immediately either to a supervisor, Avita's legal counsel, or the Corporate Compliance & Privacy Officer.

(c) Gifts From Existing Vendors. Employees may accept and retain gifts from vendors which have a nominal value. Avita has made no attempt to define "nominal" as a specific dollar value. Rather, Avita expects its employees to exercise good judgment and discretion in accepting gifts. If an employee has any concern whether a gift should be accepted, the employee should consult with his/her supervisor. To the extent possible, these gifts should be shared with the employees' co-workers. Employees shall not accept excessive gifts, meals, expensive entertainment or other offers of goods or services which have more than a nominal value nor may they solicit gifts from vendors, suppliers, contractors or other persons.

(d) Vendor Sponsored Entertainment. At a vendor's invitation, an individual may accept meals or refreshments of a reasonable value at the vendor's expense. Occasional attendance at a local theater or sporting event, or similar entertainment of reasonable value at vendor expense, may also be accepted, provided that a regular business representative of the vendor is in attendance with the employee.

Workshops, seminars and training sessions. Attendance at local, vendor-sponsored workshops, seminars and training sessions is permitted. Attendance, at vendor expense, at out-of-town seminars, workshops and training sessions is permitted only with the approval of the President and CEO.

Contracting. Employees may not utilize "insider" information for any business activity conducted by or on behalf of Avita. All business relations with contractors must be conducted at arm's length both in fact and in appearance and in compliance with Avita policies and procedures. Employees must disclose personal relationships and business activities with contractor personnel which may be construed by an impartial observer as influencing the employees' performance or duties. Employees have a responsibility

to obtain clarification from management employees on questionable issues which may arise and to comply, where applicable, with Avita's conflict of interest policy.

Business Courtesies. Avita employees shall not seek to gain any advantage through the improper use of payments, business courtesies or other inducements. Offering, giving, soliciting or receiving any form of bribe or other improper payment is prohibited. Appropriate commissions, rebates, discounts and allowances are customary and acceptable business courtesies provided that they are approved by Avita management and that they do not constitute illegal or unethical payments. Any such payments must be reasonable in value, competitively justified, properly documented, and made to the business entity to whom the original agreement or invoice was made or issued. Such payments should not be made to individual employees or agents of business entities. In addition, employees may provide gifts, entertainment and meals of nominal value to Avita customers, current and prospective business partners and other persons when such activities have a legitimate business purpose, are reasonable and consistent with all applicable laws. Notwithstanding the foregoing, cash gifts may not be provided. Furthermore, if the business partner is an independent physician who refers or may refer patients to Avita, then the total maximum items or services that may be conferred (including meals) for 2025 is $519.00. Non-monetary Medical Staff incidental benefits which can be offered to independent physicians on the Medical Staff, in relation to sanctioned Medical Staff activities (such as meals, parking and other items or incidental services) and consumed on Avita's campuses, is $45 per occurrence. Such items or services cannot be solicited by the physician or his or her group, and cannot be conferred in any manner that takes into account the volume or value of referrals or other business generated by the referring physician.

Employed Physician Relationships with Drug and Device Manufacturers. Under the Physician Payments Sunshine Act, manufacturers of drugs, devices, biologicals, and medical supplies covered under Medicare or Medicaid programs ("Reporting Entities") are required to report annually their financial arrangements with physicians to the Federal Government. Because such relationships can have a direct impact on Avita, physicians employed by the System must obtain the prior review and approval of Avita before entering into a financial relationship with a Reporting Entity. Such requests shall be directed to the Corporate Compliance & Privacy Officer for review and approval.

6. STEWARDSHIP OF ASSETS: ALL EMPLOYEES WILL MAKE PRUDENT USE OF AVITA RESOURCES AND PROPERLY AND ACCURATELY REPORTING ITS FINANCIAL CONDITION.

Internal Controls. Avita has established control standards and procedures to ensure that assets are protected and properly used and that financial records and reports are accurate and reliable. All employees of Avita share the responsibility for maintaining and complying with required internal controls.

Financial Reporting. All financial reports, accounting records, research reports, expense accounts, time sheets and other documents must accurately and clearly represent the relevant facts or the true nature of a transaction. Improper or fraudulent accounting, documentation or financial reporting is contrary to the policy of Avita and may be in violation of applicable laws.

Travel and Entertainment. Travel and entertainment expenses should be consistent with each employee's job responsibility and Avita's needs and resources. It is Avita's policy that an employee should not suffer a financial loss nor a financial gain as a result of business travel and entertainment. Employees are expected to exercise reasonable judgment in the use of Avita's assets and to spend the organization's assets as carefully as they would spend their own. Employees must also comply with Avita policies relating to travel and entertainment expenses.

Personal Use of Corporate Assets. All employees are expected to refrain from converting assets of Avita to personal use. All property and business of the organization shall be conducted in the manner designed to further Avita's interest rather than the personal interest of an individual employee. Employees are prohibited from the unauthorized use or taking of Avita's equipment, supplies, materials or services. Prior to engaging in any activity on company time that may result in remuneration to the employee or the use of Avita's equipment, supplies, materials or services for personal or non-work related purposes, an employee shall obtain the approval of his or her supervisor, Avita's Corporate Counsel, or the Corporate Compliance & Privacy Officer.

APPLICATION

Avita expects each person to whom this Code of Conduct applies to abide by the Standards set forth herein and to conduct the business and affairs of Avita in a manner consistent with the general statement of principles set forth herein.

Failure to abide by this Code of Conduct or the guidelines for behavior which the Code of Conduct represents may lead to disciplinary action. For alleged violations of the Code of Conduct, Avita will weigh relevant facts and circumstances, including, but not limited to, the extent to which the behavior was contrary to the express language or general intent of the Code of Conduct, the seriousness of the behavior, the employee's history with the organization and other factors which Avita deems relevant. Discipline for failure to abide by the Code of Conduct may, in Avita's discretion, range from oral correction to termination.

While Avita will generally attempt to communicate changes concurrent with or prior to the implementation of such changes, Avita reserves the right to modify, amend or alter the Code of Conduct without notice to any person or employee. Nothing in this Code of Conduct is intended to nor shall be construed as providing any additional employment or contract rights to employees or other persons.

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