

Code of Conduct

Document Number 1.1 Version 4

Effective Date: 21 October 2025

1. Purpose

At Sigma, we're more than just a workplace. We are part of something bigger. Together, we power pharmacy across Australia, supporting the health and wellbeing of millions. Whether you're in one of our distribution centres, medical packaging facilities or support teams, every role matters and every person makes a difference. This Code of Conduct (Code) sets out what it means to be part of Team Sigma. It's here to guide our decisions, help us act with integrity and care, and support a workplace where everyone feels safe, respected, and proud to belong.

The Code applies to everyone working with or on behalf of Sigma, including Team Members, directors, including board members, regardless of location or role. It covers conduct connected to work and includes, but is not limited to:

- behaviour during work hours and while performing work duties;
- conduct at work-related events, conferences, training, or social functions;
- interactions with Stakeholders;
- activity on digital platforms or social media where Sigma is referenced or represented;
- any other situation where your actions could reasonably be seen as reflecting on Sigma, including actions that occur outside of normal working hours.

Understanding and following the Code is part of being on the Team. This Code of Conduct should be read in conjunction with Sigma's other policies and procedures, which provide more specific requirements and guidance.

The Code sets the standards of behaviour, and the related policies explain these standards in greater detail. Breaches of this Code may lead to serious consequences, up to and including termination of employment. If you are ever unsure about the right thing to do, please seek support from your People Leader or the People & Culture team. We are here to help.

2. Scope

The Code applies to all Sigma Team Members engaged on a full-time, part-time, casual or temporary basis engaged by Sigma or working on Sigma sites as well as directors, including board members.

Sigma Stakeholders include shareholders, customers, suppliers, government agencies, regulatory authorities, the public and others on Sigma's behalf, for the purposes of this Code referred to as 'Stakeholders'.

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3. Definitions

Sigma: means Sigma Healthcare Limited (ACN 088 417 403) and any company, trust or other entity that is Controlled by, or is under common Control of, Sigma Healthcare Limited, and includes any Related Body Corporate or Associated Entity of Sigma Healthcare Limited.

Associated Entity: has the meaning given to that term in section 50AAA of the Corporations Act 2001.

Control means to:

(a) have the capacity to directly or indirectly determine or materially influence the outcome of decisions relating to the financial or operational management and/or policies of an entity, or

(b) own, directly or indirectly, fifty percent (50%) or more of the outstanding voting securities or other ownership interest of such entity,

and *Controls* and *Controlled* have a corresponding meaning.

Related Body Corporate: has the same meaning given to that term in section 50 of the Corporations Act 2001.

Team Member: means any Sigma employee or contractor engaged by Sigma.

Stakeholder: anyone Sigma interacts with including, but not limited to, customers, suppliers, shareholders, government agencies, regulatory authorities, the public or others on Sigma's behalf.

Undertakings: means the undertaking to the Australian Competition and Consumer Commission (ACCC) given under section 87B of the Competition and Consumer Act 2010 (Cth) by Sigma Healthcare Limited.

4. Key Principles

Every Sigma Team Member plays a role in bringing our purpose to life. We are guided by three key principles that help shape how we work, make decisions, and support each other every day:

- Honest & Ethical Behaviour
- Respect for People & Property
- Legal Compliance.

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These principles are not abstract ideas; they shape each decision we make, strengthen trust with our customers and partners, and create a workplace where everyone can succeed. The following sections explain exactly what these principles look like in action.

4.1 Honest and Ethical Behaviour

We do the right thing even when no one is watching. Acting with honesty and integrity builds trust between us, our customers and our partners and helps protect Sigma's reputation.

We choose transparency over shortcuts and put Sigma's reputation ahead of personal gain.

At Sigma, we bring these principles to life through the following actions and behaviours:

- Confidential information about Sigma, Stakeholders and Team Members is protected and shared only with proper authority.
- Actual, potential, or perceived conflicts of interest, such as a second job, personal relationship, commission, or gift, must be disclosed promptly.
- Sigma's time, money, products, equipment, intellectual property, and services must only be used for legitimate business purposes and never for personal use or benefit.
- Theft of Sigma's products, property, or assets will not be tolerated and may result in disciplinary action up to and including termination of employment, as well as possible legal action.
- Any fraud, theft, bribery, document falsification, or dishonest conduct is rejected and reported as soon as it becomes known.
- Sigma's IT systems are used responsibly, passwords are protected, and content that is offensive, discriminatory, or inappropriate is never created, accessed, or shared.
- Social media is engaged with respectfully and lawfully; speaking on behalf of Sigma only occurs when clearly authorised.
- CCTV and IT monitoring are understood to help protect people, assets, and data and their ethical use is accepted in accordance with the law.
- Concerns or suspected breaches are reported to a People Leader, People & Culture, Loss Prevention, or through the whistleblower line; speaking up in good faith is always supported.
- We take responsibility for our actions and understand that any breach of this principle will be addressed fairly and may lead to appropriate consequences.

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4.2 Respect for People and Property

We create a safe and inclusive environment where everyone feels valued. We respect the diversity of backgrounds, perspectives, and talents within our team and our communities. We recognise the value that diversity brings to our business and reflect this in how we interact every day.

We uphold these commitments by:

- Treating all Sigma Team Members and Stakeholders with dignity, respect, professionalism, promptness and helpfulness.
- Acknowledging and appreciating the diversity of our workforce and having regard for cultural and religious sensitivities.
- Not tolerating harassment, bullying, unlawful discrimination, vilification, or victimisation, and taking action or reporting it if we see or experience such behaviour.
- Making health, safety, and wellbeing a priority by providing and maintaining a safe and healthy environment for all Team Members and Stakeholders, and ensuring that we follow all instructions, managing risks within our control, and reporting hazards, near misses, and incidents as soon as they happen.
- Ensuring that our actions and decisions support Sigma's commitments to human rights and the elimination of modern slavery, including treating people fairly and not engaging in or enabling exploitative practices.
- We respect Sigma's property and the belongings of our Team Members, and Sigma Stakeholders. Any deliberate or reckless damage, loss, or theft is a serious breach of trust.
- We come to work fit for duty and not under the influence of alcohol, illicit drugs, or any medication that affects performance. Some sites may also require drug and alcohol testing under the relevant Drug and Alcohol Policy
- Complying with all Sima policies and procedures

4.3 Legal Compliance

Everyone shares the responsibility to understand and comply with the laws, regulations, and industry standards that govern how we operate, including Federal, State, and local requirements. This commitment helps maintain Sigma's integrity and supports safe, ethical business practices.

We maintain Sigma's integrity and meet our obligations by acting in line with the following responsibilities:

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- Not participating in or allowing the organisation to become involved in any unlawful and illegal activity or transaction (directly or indirectly).
- Not seeking or accepting any bribe, commission or procurement fee, or share commission with an agent or any other person in connection with a sale, purchase, or any other activity or transaction arising in the course of the business of the organisation, or concerning a service rendered by the organisation.
- Ensuring delegated authority limits are complied with (Refer Sigma's Delegated Authorities Policy).
- Ensuring that legislation governing insider trading and related issues is understood and followed by team members with share price sensitive information (Refer Sigma's Share Trading Policy).
- Ensuring compliance and adherence to the Undertakings.
- Adherence to the Therapeutic Goods Act, Regulations and Orders, in particular the Code of Good Wholesaling Practice (GWP) and the Code of Good Manufacturing Practice (GMP).
- Adherence to all Sigma Health & Safety policies and procedures.
- Ensuring compliance and adherence to all applicable laws and regulations.

5. Your responsibilities

At Sigma, you are expected to act with honesty, integrity, and respect in everything you do. This means protecting Sigma's reputation, complying with our policies and the law, and speaking up if something doesn't feel right.

6. Breach of Policy

The Code of Conduct is Sigma's primary governance document, setting the highest standards for behaviour and accountability. Any failure to comply with this Code, as with all Sigma policies, may result in disciplinary action up to and including termination of employment.

Material breaches of this Code will be reported to Sigma's Nomination & Remuneration Committee in line with ASX Principles.

7. Reporting

If you believe a breach of the Code has occurred, or if you need assistance to confirm whether a situation may be a breach, you should raise it with your People Leader or a senior member of the People & Culture team (Refer Sigma's Whistleblower Policy and Respect at Work Policy). All

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concerns will be taken seriously and handled in accordance with the provisions of Sigma’s Whistleblower Policy and the Respect at Work Policy.

Anyone who speaks up about serious concerns will be supported and protected from victimisation, discrimination, or retaliation.

Reports must be made in good faith, meaning you provide all the information you have and genuinely believe it to be true.

8. Disclaimer

This Policy sets out Sigma’s general approach to the matters it covers but is not intended to bind Sigma. Accordingly, this Policy acknowledges that Sigma, at its absolute discretion with reasonable notice to you, may amend, vary or terminate this Code and in any individual case, may depart from this Code wholly or in part.

9. Document control and Related Documents

Name of Document	Code of Conduct Policy		
Document Author	General Manager P&C Retail		
Document Approver	Board of Directors		
Document Reviewers	Senior Counsel, Chief People Officer, GM P&C Support Office & Operations	Nomination and Remuneration Committee	
Review Period	2 years		
Related Documents	Respect at Work Policy Whistleblower Policy Conflict of Interest Policy Gifts, Gratuities, and Entertainment Policy Delegated Authorities Policy Sigma's Share Trading Policy		
Change Record	Version	4	
	Publish date	29 October 2025	

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10. Policy Version Register

Version	Modified by	Description of changes	Authorised by	Effective date
2	Chief People Officer	Updating titles referenced in the Policy. Updating coverage of the Good Working Relationships Policy	Board of Directors	9 February 2024
3	Chief People Officer	Inserted details on Undertaking requirements	Board of Directors	3 February 2025
4	GM P&C Retail	Amended for application for MergeCo including insertion of updated Sigma Healthcare definition	Board of Directors	21 October 2025