

Code of Conduct Policy

Version 3.2
Effective Date: 9 February 2024

1. Purpose

Sigma requires the highest standards of integrity and conduct from all team members. This Code of Conduct outlines the principles and behaviours required of Sigma team members to maintain and achieve these standards. Any breach of the Code of Conduct by team members may result in disciplinary action in line with Sigma's disciplinary procedures, up to and including termination of employment. Individuals who identify breaches of this Code of Conduct by other team members should report the breach to their immediate manager or a Human Resources representative for investigation. (Refer Sigma's *Whistleblower Policy* and *Good Working Relationships Policy*.)

This policy applies to behaviours that occur:

- In connection with work, even if it occurs outside normal working hours
- During work activities, for example when dealing with Sigma stakeholders
- At work related events, for example at conferences and work-related social functions
- On social media where team members interact with colleagues or Sigma stakeholders

2. Scope

This policy applies to all Sigma team members engaged on a full-time, part-time, casual or temporary basis and contractors engaged by Sigma or working on Sigma sites; for the purpose of this policy referred to as "team members". Sigma stakeholders include shareholders, customers, suppliers, government agencies, regulatory authorities, the public or others on Sigma's behalf; for the purpose of this policy referred to as "stakeholders".

3. Definitions

Sigma: means Sigma Healthcare and all wholly owned subsidiaries of Sigma Healthcare.

Team member: means an employee of Sigma.

4. Key Principles

The key principles of the Sigma Code of Conduct are:

- Honest and ethical behaviour
- Respect for people and property
- Legal compliance

4.1 Key Principles

Sigma team members will conduct themselves with honesty and integrity. We will act in a professional manner that is consistent with Sigma's values by:

- Not divulging confidential information about the organisation, its team members customers or suppliers without proper authorisation;
- Minimising any conflict of interest by making full disclosure to Sigma where a potential or actual conflict of interest exists (including, but not limited to, supplementary employment; commission or fees received; or, receipt of material gifts or benefits – (Refer Sigma's Conflict of Interest Policy and Conflict of Interest Declaration and Gifts, Gratuities and Entertainment Policy).
- Not using Sigma time inappropriately for personal purposes;
- Reporting any knowledge of fraud, material error, breach of law, or of a concealed practice against the interest of Sigma (Adherence to Sigma's policies relating to Contracts, Legal Engagement and Delegated Authorities);

- Not using any company asset on an unauthorised basis for personal use or gain (including goods, money, equipment, corporate cards, intellectual property or the services of other areas of the organisation).

4.2 Respect for People and Property

Sigma team members will treat all other team members and Sigma stakeholders courteously, fairly and without harassment or unlawful discrimination in any other form. We endeavour to nurture a culture that embraces individual difference in all its forms and values the many benefits that transpire from all aspects of diversity. We will also maintain the organisation's property with respect and care.

We will undertake this 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;
- Complying with Sigma's Good Working Relationships Policy covering Equal Opportunity, a prohibition on Harassment (including sexual and sex Based harassment), discrimination, bullying, vilification, victimisation, ;
- Not participating in any verbal, written or physical act in the workplace (including bullying, harassment or fighting) that offends, intimidates or endangers the safety of any other team member or person working on Sigma premises;
- Providing and maintaining a safe and healthy environment for our team members and stakeholders – this includes our work environment and local community;
- Preventing damage to Sigma's property or property owned by team members or Sigma stakeholders. Theft of company property or goods will not be tolerated;
- Complying with all Sigma policies and procedures;
- Observing and complying with lawful and safe instructions of the organisation and persons with authority to issue instructions.

4.3 Legal Compliance

Sigma team members will comply with all Federal, State and local laws and regulations with particular regard for:

- Not participating in or allowing the organisation to become involved in any 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);
- 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.

5. Breach of Policy

As is the case with all of Sigma Healthcare's Policies, failure to comply with this Policy may result in disciplinary action, leading up to and including, termination of employment.

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

6. 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 may, at its absolute discretion, amend, vary or terminate the Policy at any time and in any individual case, may depart from the policy wholly or in part.

7. Team Member Declaration:

I have read and understood the Sigma Code of Conduct and undertake to comply with these principles. I understand that a breach of this Code may result in disciplinary action being taken in line with Sigma’s disciplinary procedures, which may be up to and including termination of employment.

Name of Team Member:

Signature:Date:

8. Document control and related documents

Name of document	Code of Conduct Policy		
Document Author	Head of Workplace Relations		
Document Approver	Chief People Officer		
Document Reviewers	Chief People Officer		
Review Period	2 yearly		
Related documents	Good Working Relationships Policy, Whistleblower Policy Conflict of Interest Policy, Gifts, Gratuities, and Enterainmetn Policy, Delegated Authorities Policy, Sigma’s Share Trading Policy		
Change record	Version	3.2	
	Publish date	9 February 2024	

Policy Version Register

Version	Modified by	Description of changes	Authorised by	Effective date
		Updating titles referenced in the Policy Updating coverage of the Good Working Relationships Policy		