

ACRUX LIMITED

CODE OF CONDUCT



1. OVERVIEW

Directors and management of Acrux Limited and its controlled entities (the 'Company' or 'Acrux') are committed to high standards of corporate governance, ethics and conduct in all Company dealings.

This Code of Conduct outlines the ethical and legal framework for how the Company will conduct its business and how the Company will relate to its stakeholders, including shareholders, employees, business partners, customers, suppliers, the community and the environment in which the Company operates.

2. OBJECTIVES AND PURPOSES

The Code of Conduct is the foundation of the Company's Corporate Values and should be read in conjunction with other Human Resources and Corporate Governance Policies.

Directors and employees must comply with this Code as well as all Company policies and procedures and uphold the reputation of the Company at all times. Disciplinary and/or legal action will be taken in the event of breaches of standards and/or conduct which is not in accordance with this Code of Conduct or other Company Policies.

3. GENERAL PRINCIPLES

The Board establishes the following general principles:

3.1 Honesty, integrity and fairness

Honesty, integrity and fairness are integral to the way Acrux operates and guide the manner in which we conduct business and make decisions. Directors, employees and any other party representing Acrux are expected to act ethically, fairly, honestly and with high standards of personal integrity and commitment to quality in all Company dealings.

Directors and employees are expected to exercise care and diligence when performing their duties and are required to present in a manner that does not impact their ability to perform their duties or impair their decision making. When representing the Company, directors and employees may not allow their performance or conduct to be adversely impacted by alcohol or drugs.

3.2 Compliance with laws and regulations

The Company's activities are conducted according to the laws and regulations of the countries in which the Company operates and applicable pharmaceutical industry standards.

Employees are expected to at all times, fulfill the obligations of their position to the best of their personal skills and experience and to comply with any reasonable and lawful directions from management.

3.3 Confidentiality and protection of Company assets

Acrux will maintain the confidentiality and privacy of all information which is reasonably considered to be confidential and private including, but not limited to employee details and financial information.

Directors and employees are required to maintain the security of Acrux's facilities and assets at all times including but not limited to physical security, Company intellectual property and confidential information.

3.4 Conflicts of interest

Directors, employees and any other party representing Acrux are required to act in Acrux's best interests. They may not engage in activities that involve, or could appear to involve, a conflict between their personal interests and the Company's interests and must not knowingly enter any arrangement which would negatively impact Company operations.

Any actual or potential conflicts of interest are required to be fully disclosed to the CEO or Company Secretary.

3.5 Shareholders and the financial community

The Company is committed to ensuring timely information is available to stakeholders so financial markets are properly informed of matters which could reasonably be expected to have a material effect on the price of the shares of Acrux Limited.

Further information is available in the Continuous Disclosure and Shareholder Reporting Policy.

3.6 Fair and safe workplace

Acrux is committed to providing a fair and safe workplace which is free of bias and discrimination providing equal employment opportunity for all. Directors, employees and any other party representing Acrux may not engage in, condone or fail to act against harassment, bullying, victimisation, bias, discrimination or other offensive conduct.

Recruitment and promotion decisions are based on individual merit, having consideration of the skills, experience, qualifications and other characteristics which are prerequisite to the performance of the specific job.

Further information is available in the Occupational Health & Safety Policy, the Diversity and Inclusion Policy, the Company's Employee Handbook and other HR policies.

3.7 Trading in Acrux securities

Directors, employees, persons connected to Directors and employees and any other party representing Acrux must not deal in Acrux's securities if they possess price sensitive information that is not generally available.

Further information is available in the Securities Trading Policy.

3.8 Environment, Health and Safety

The Company is committed to providing a safe environment in which to work and for stakeholders to visit and to conducting operations in a manner which minimises environmental impact and conserves natural resources.

All employees must have a commitment to safety, follow all reasonable directions and directives in order to comply with Acrux's Occupational, Health, Safety and Risk Management Policies and take action to protect the health, safety and wellbeing of themselves and others.

The Company provides support and training to assist employees in their responsibilities of ensuring a safe workplace for all.

3.9 Bribes and Financial inducements

The Company will not directly or indirectly offer, pay, solicit or accept bribes. Directors, employees and any other party representing Acrux must not offer or accept inducements such as gifts or other benefits which could influence, or be seen to influence, objective decision making.

Further information is available in the Anti-bribery, Corruption and Fraud Policy.

3.10 Political Donations

Acrux does not affiliate itself with or make payments to any political party.

4. REPORTING NON-COMPLIANCE AND GRIEVANCES

Acrux is committed to maintaining a culture where concerns about misconduct or an improper state of affairs can be safely raised in good faith. All Directors and employees should report any concerns about any activity or perceived activity that could impact safety, is unlawful, not in accordance with Company policies or could, or has, put the reputation of the Company at risk.

Disciplinary action, including termination, may be instigated for unsatisfactory performance or misconduct.

Further information is available in the Whistleblower Policy, including details about making a Protected Disclosure.

5. ADMINISTRATION

This Code of Conduct can be viewed on the Company's website.

The Company's Board of Directors approved this policy on 24 June 2025 and will review this policy as often as it deems appropriate and amend as it deems necessary or desirable.

Questions about this Code and its application by employees should be directed to their manager, Human Resources or the Company Secretary.

Questions about this Code and its application by other stakeholders should be directed to the Company Secretary.