Resmed



# Code of business conduct and ethics

August 2026

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Summary

# On behalf of your Board of Directors and as your Chief Executive Officer

## Dear Resmed employee,

Resmed is dedicated to conducting our business with the highest standards of business ethics. We have an obligation to our employees, shareholders, customers, suppliers, community representatives and other business contacts to be honest, fair and forthright in all of our business activities.

As an employee of Resmed, you are faced every day with a number of business decisions. It is your personal responsibility to uphold Resmed's high standards of business ethics, including belonging, diversity and inclusion, in each and every one of these situations. It is not possible for our Code of Business Conduct and Ethics to address every situation that you may face. If you follow our corporate Values, your business decisions are not likely to raise ethical issues. When you are faced with an ethical issue, we hope that our Values and this Code will serve as a guide to help you make the right choice.

We also encourage you to take this opportunity to review our policies and to discuss any questions you may have with your supervisor or with the Global Ethics and Compliance department or Legal department directly. Finally, the guidelines set out in this Code are to be followed at all levels of this organization by our directors, officers and employees.

Our Code of Conduct begins with a re-affirmation of the corporate values and we need to continually align our actions with those values. As a Resmed employee, you have an affirmative duty to report any known or suspected violation of this Code and potential violations of the law and regulations, without fear of retaliation.

We rely on you to uphold our core values and conduct our business honestly, fairly and with integrity. Thank you for everything you do.

Sincerely,
Michael Farrell
Chairman and Chief Executive Officer



# Corporate values

- RESOLUTE INTEGRITY
  We breathe trust and honesty into every interaction.

- RESOURCEFUL INNOVATION
  We dream, create, and reinvent our world with curiosity and courage.

- RESPONSIBLE QUALITY
  We always strive for the next level of excellence for our customers and patients.

- RESPECTFUL DIVERSITY
  We embrace differences and unite strengths to achieve more together.

- RESOUNDING IMPACT
  Every action matters transforming outcomes for our people, customers, communities, and the world.





# Our mission





## Our mission is to create life-changing health technologies that people love.

Our vision is a world where every person can achieve their full potential through better sleep and breathing, with care delivered in their own home.

Our mission and vision are more than words; they are the foundation of our strategy, our values, and our culture. They remind us why we come to work each day and the impact we create together: helping people everywhere rise to their highest potential through better sleep and breathing

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# 01
# Introduction

## Purpose

This Code of Business Conduct and Ethics (the Code) contains general guidelines for conducting the business of Resmed consistent with the highest standards of business ethics. Observing the Code helps us both comply with the applicable law and regulations and inspires the trust and confidence of our key stakeholders.

This Code applies to Resmed and each of our subsidiary companies. It applies to our directors, officers, employees and those acting on our behalf, such as agents, vendors, suppliers and consultants. Each of us is responsible for knowing and complying with the standards set forth in the Code.

## Seeking help and information

The Code is not a comprehensive rulebook and cannot address every situation that you may face. Resmed has adopted internal policies that provide more context on a particular topic. To provide employees with more information on those topics, please visit the Global Ethics and Compliance site on the HUB.

If you feel uncomfortable about a situation, or have any doubts about whether your actions might violate the Code, then seek help. Specifically, we encourage you to first contact your supervisor for help.

If your supervisor cannot answer your question or if you do not feel comfortable contacting your supervisor, contact the Global Ethics and Compliance department at EthicsOffice@Resmed.com. Local laws and regulations may differ by country. Please contact your local Compliance or Legal department to ensure the proper reporting mechanisms are being followed.

Resmed is a global company. Our values of inclusion and integrity are global and separate from local policies. Because this Code is a global resource for Resmed, it is generally consistent with the laws everywhere Resmed operates.
Sometimes, however, local laws will require a different approach. We have noted some of those differences in the Code, but the law is constantly changing. Therefore, if you believe that local law in your country is inconsistent with the guidance in the Code on a particular topic, please consult relevant local policies and procedures that are available on our company intranet. If your question is not addressed there, then ask your supervisor. In most cases, your supervisor is in the best position to help address concerns and direct you to the appropriate resource. The Global Ethics and Compliance department and the Legal department are also available to assist you with any questions or concerns regarding the Code or relevant company policies and procedures.

## Reporting violations of the Code

All employees have an affirmative duty to report any known or suspected violation of this Code. Generally, if you know of or suspect a violation of this Code, immediately report the conduct to your

supervisor. You may also make a report, including concerns of actual or potential misconduct, through our Ethics Hotline, which is managed by an independent third party. The Hotline is accessible 24 hours a day, seven days a week, with translators available when necessary. Where allowed by local law, you may choose to make an anonymous report through the Ethics Hotline.

Resmed treats reported information in a confidential manner to the extent allowed by local laws and will always uphold our commitment to our non- retaliation policy.

Depending on local laws and regulations, you may use any of the following methods to submit a report to the Ethics Hotline:

- File a report online at resmedethicsreporting.com
- Send an email to EthicsOffice@Resmed.com
- Call your location's Ethics Hotline at the toll-free number provided at resmedethicsreporting.com
- If you do not wish to submit a report using the Hotline or the on-line reporting tool, please submit your report via postal mail to:

  Attn: Chief Compliance Officer
  Resmed Inc.
  9001 Spectrum Center Blvd
  San Diego, CA 92123 USA
  jim.ellis@Resmed.com

## Violations of the Code

An employee violating the Code will be subject to appropriate discipline, up to and including termination of employment. The particular discipline in each situation will be based upon the facts and circumstances of that situation, and the requirements of local laws. Employees who violate the law as outlined in this Code may expose themselves to substantial civil damages, criminal
fines and prison terms.

Resmed may also face substantial fines and penalties and may incur damage to our reputation and standing in the community. Your conduct as a representative of Resmed, if it violates the law or the Code, can result in serious consequences for both you and Resmed.

## No retaliation

Employees who report potential violations of the Code – or who participate in an investigation of a potential violation of the Code in good faith will be protected against any form of retaliation. This is true even if the report turns out to be wrong or the reported conduct does not violate the Code. Prohibited retaliation includes firing, demotion, transfer or other negative job consequences connected to the ethics report. Anyone who retaliates against an employee for reporting a violation of the Code may be subject to disciplinary action, including termination of employment.

## Reporting in good faith

Good faith reporting means a report of conduct defined as wrongdoing, which the person making the report has reasonable cause to believe is true and is made without malice or consideration of personal benefit. Reports lacking good faith due to acts of dishonesty, personal benefits or malice are not acceptable under this Code and may be subject to disciplinary action.

## Waivers of the Code

On rare occasions an exception to the Code may be possible. Waivers for employees may be made only by an executive officer of Resmed. Any waiver for directors or executive officers may be made only by our board of directors or the appropriate committee of our board of directors and will be disclosed to the public on our website at www.Resmed.com within five business days or otherwise as required by law or the rules of the New York Stock Exchange.

# 02

# Equal opportunity, discrimination, anti-racism and harassment

## Equal opportunity

Resmed believes in equal opportunity for our employees and is committed to following applicable laws preventing discrimination and harassment.

Resmed recruits, hires, compensates and trains individuals without regard to a person's race, color, religion, age, gender, national origin, marital status, sexual orientation, disability or other legally protected status.

## Discrimination

Resmed makes employment decisions on ability and merit, not personal characteristics unrelated to the job. Resmed values diversity and is inclusive toward others with different backgrounds and experiences. Therefore, it is against Resmed policy to discriminate against any employee based on a legally protected status. If you observe discrimination at the workplace, or believe you are the victim of discrimination, please report your concerns to your supervisor, People team or the Legal department.

## Anti-racism

Everyone across Resmed globally is entitled to a safe and respectful environment. We are a workforce that does not tolerate any racist expressions, comments, or actions, from the most egregious acts to micro-aggressions that hurt and/or deprive team members of the dignity they deserve at work. We claim inclusiveness as one of our key pillars and values and aim to see this transformed into our overall language, our day-to-day conversations, in our practices, and in our communications, written policies and procedures. If you experience or observe conduct that is racist and in violation of this policy, please bring your concern to your manager, or to a member of the People team or any member of senior management as soon as possible. At Resmed, we take such violations very seriously and stand by our commitment to a psychologically safe and inclusive workplace for all people. Additionally, the Ethics Reporting Hotline offers team members a confidential way to report any form of prohibited harassment or discrimination.

Resmed code of business conduct and ethics





Callers may identify themselves openly, remain anonymous or request confidentiality.

## Harassment

Similarly, Resmed believes that all employees should be free of harassment on the job.

Harassment includes any unwelcome verbal, physical or visual conduct that humiliates or is hostile toward an employee based on a protected status. For example, sexual harassment is unwelcome sexual behavior. Bullying is also prohibited in many countries, and is not appropriate behavior at Resmed. Simply put, Resmed will not tolerate harassment or mistreatment of our employees.

While Resmed prohibits discrimination and harassment everywhere we do business, the particular laws applicable in a region may differ. Therefore, Resmed's PeopleTeam publishes guidelines and policies describing the behavior expected of our employees in the various countries in which we do business. For further information, please consult your local PeopleTeam.

All employees should deal fairly and honestly with their fellow employees and with Resmed customers and suppliers.

# 03
# Conflicts of interest

## Identifying conflicts of interest

A conflict of interest is when your personal interest interferes with, could interfere with, or appears to interfere with, Resmed's interests. You should avoid any conflict – or the appearance of any conflict – that affects your ability to act in Resmed's best interests.

The following situations are common examples of conflicts of interest:

### Outside employment

Every employee owes a duty of loyalty to Resmed. No employee should be employed by, serve as a director of, or provide any services to, a company that is a competitor, customer, supplier of Resmed, or a legal entity/person who can provide a benefit to Resmed directly or indirectly.

In some countries, it may be acceptable to engage in outside employment as long as it does not interfere with a person's employment at Resmed. Before accepting outside employment, please consult your local People team policies and procedures.

### Improper personal benefits

No employee may seek or accept any material personal benefits such as gifts, entertainment or favors because of the employee's position with Resmed. If you have any doubt about whether a personal benefit is material, please discuss it with your manager to determine whether it should be declined or accepted only under certain circumstances.

### Financial interests

No employee should have a financial interest (ownership or otherwise) in any company that is a competitor, customer or supplier of Resmed. Ownership of a broad-based mutual fund is not a conflict of interest even if the fund owns shares of a competitor, customer or supplier.

### Loans or other financial transactions

No employee should seek or accept loans or enter into any other personal financial arrangements with a customer or supplier of Resmed. Arms-length transactions with banks, brokerage firms or other financial institutions that also provide services to Resmed are not conflicts of interest.

### Service on boards and committees

No employee should serve as a director or trustee of any entity (whether profit or not-for-profit) if that entity's interests might conflict with those of Resmed. The best approach is to ask your supervisor before you agree to serve on the board of any other organization.

### Taking a company opportunity

No employee may use corporate property, information or a position with Resmed for personal gain. If you are presented with an opportunity that may be interesting or profitable to Resmed, it must first be presented to Resmed for evaluation.

### Actions of family members

The actions of family members may also give rise to conflicts of interest because they may influence an employee's objectivity in making decisions on behalf of Resmed. For purposes of the Code, "family members" include your spouse or life-partner, brothers, sisters, parents, in-laws, and children, whether such relationships are by blood, marriage or adoption.

If you are uncertain whether a particular company is a customer, supplier or competitor, please contact the Global Ethics and Compliance department for assistance.

### Relationships with customers/suppliers/service providers

A conflict of interest can arise when you have a personal relationship or family ties with customers, suppliers or service providers. The selection of a supplier or service provider should be based on the qualifications and/or quality of service they provide. You should avoid selecting suppliers or service providers based solely upon personal relationships and always avoid selecting suppliers or service providers based solely on family ties. You should disclose any relationship with a customer, supplier or service provider that could be perceived as a potential conflict of interest. See also section 8, Managing Customers and Suppliers.

## Disclose conflicts of interest

Resmed requires that employees disclose situations that could give rise to a conflict of interest. If you think that you have a conflict of interest, or something that others could reasonably think is a conflict of interest, report it to your supervisor or Global Ethics and Compliance. We will work with you to determine whether you have a conflict of interest and, if so, how best to address it. Conflicts of interest may only be waived as described in the "Waivers of the Code" section. Please visit the Global Ethics and Compliance intranet site for instructions on completing a waiver form.



You should avoid any conflict that affects your ability to act in Resmed's best interests.

# 04
# Confidential information

## Company information

All employees must keep Resmed's non-public information confidential. Confidential information that must be protected includes non-public information that might be of use to competitors or would be harmful to Resmed if disclosed.
Employees must also protect confidential information of third parties that conduct business with Resmed. Confidential information should not be disclosed unless authorized or legally required. Any authorized disclosure of confidential information should be subject to a confidentiality agreement requiring the other party to keep the information confidential once disclosed. The obligation to keep Resmed information confidential continues after an employee leaves Resmed.
Please remember that unauthorized disclosure of confidential information could cause competitive harm to Resmed and could result in legal liability to you and Resmed.

Any questions or concerns regarding whether disclosure of Company information is authorized or legally required should be promptly referred to the Legal department. If needed, the Legal department can provide you with an appropriate confidentiality agreement. For more information on confidentiality, please refer to the Global Ethics and Compliance site on the HUB for the Insider Trading Policy and the Regulation Fair Disclosure Policy.

## Patient information

Resmed products are being used to treat millions of patients around the world each day. Many of our devices communicate directly with Resmed so that we can provide patients, physicians and other healthcare professionals with information to improve patient lives. As a result, we receive private health information about patients and the treatment they are receiving.

Almost every country in which Resmed does business imposes on us an obligation to protect patient information. The privacy laws in many countries are particularly restrictive with respect to the collection, storage and transmission of patient information, and must be carefully followed. And in addition to our legal duties, each of us has an ethical obligation to protect patient information so our patients will continue to trust us for treatment of their medical conditions.

Employees must handle patient information only:

- for legitimate business purposes,
- on a need to know basis,
- using approved systems and communication channels,
- using appropriate security safeguards.

If you become aware of any public disclosure of patient information, or suspect any attempt by an outsider to "hack" or steal patient information held by Resmed, immediately report that event to the Security team at securityconcerns@resmed.com, Privacy team and the Global Ethics and Compliance department.



## Employee information

We also respect our employees' confidential information. This means that access to personnel records of our employees should be limited to those Company employees who have appropriate authorization and a clear business need for the information. Employees who have access to other employees' information should seek guidance from the People Team on collection, storage and sharing of employee information. Never provide personal employee information requested by anyone without checking for proper authorization and appropriate approval from the People Team and, if necessary, from the Legal department.

## Social media

The use of social media permeates our professional and personal lives. Resmed has adopted a social media policy reminding all of us, among other things, that confidential information should never be shared on social media sites. Disclosing such information could harm Resmed and expose you to discipline.

Confidential information should not be disclosed unless authorized or legally required.

# 05
# Financial reporting and company records

## Financial reporting

As a public company, Resmed is subject to various securities laws, regulations and public reporting obligations in both the United States and Australia. Both federal law and our shareholders require the disclosure of accurate and complete information regarding Resmed's business, financial condition and results of operations. Inaccurate, incomplete or untimely reporting can severely damage Resmed, result in legal liability, and damage our credibility with our shareholders.

Resmed's Chief Executive Officer, Chief Financial Officer, and those employees working in the Finance department, have a special responsibility to ensure that all of our financial disclosures are full, fair, accurate, timely and understandable. Finance employees must understand and strictly comply with generally accepted accounting principles and all standards, laws and regulations for accounting and financial reporting of transactions, estimates and forecasts. As discussed below, Finance employees also must keep records that accurately substantiate Resmed's business and financial activities.

## Company records

Accurate and reliable records are crucial to our business. Our records are the basis of our earnings statements, financial reports and other disclosures to the public and guide our business decision- making and strategic planning. Company records include booking information, payroll, timecards, travel and expense reports, emails, accounting and financial data, measurement and performance records, electronic data files, contracts and all other records maintained in the ordinary course of our business.

All Company records must be complete, accurate and reliable in all material respects. You should never enter false information in Resmed's business records. Undisclosed or unrecorded funds, payments or receipts are inconsistent with our business practices and are also prohibited.



You are responsible for understanding and complying with any record-keeping policy adopted by Resmed. Ask your supervisor if you have any questions.

# 06
# Insider trading laws

Company employees are prohibited from trading in the stock, convertible bonds or other securities of Resmed Inc. while in possession of material, non-public information about Resmed. In addition, Company employees are prohibited from recommending, "tipping" or suggesting that anyone else buy or sell stock or other securities of Resmed on the basis of material, non-public information. Company employees who obtain material nonpublic information about another company – like a customer or a supplier – in the course of their employment are prohibited from trading in the stock or securities of that other company while in possession of such information, or "tipping" others to trade on the basis of such information. Violation of insider trading laws can result in severe fines and criminal penalties, as well as disciplinary action by Resmed, up to and including termination of employment.

Information is "non-public" if it has not been made generally available to the public by means of a press release or other means of widespread distribution. Information is "material" if a reasonable investor would consider it important in a decision to buy, hold or sell stock or other securities. As a rule of thumb, any information that could affect the value of stock should be considered material.

Examples of information that is generally considered "material" include:

- Financial results or forecasts, or any information that demonstrates that Resmed's financial results may exceed or fall short of forecasts or expectations
- Important new products or services
- Pending or contemplated acquisitions or dispositions, including mergers, tender offers, or joint venture proposals
- Possible management changes or changes of control
- Potential sales of stock or debt
- Acquisition or loss of a significant customer or contract
- Significant write-offs due to bad debt
- Cybersecurity risks and incidents
- Initiation or settlement of important litigation
- Changes in Resmed's auditors or a notification from our auditors that Resmed may no longer rely on the auditors' report

## Employees may not engage in certain trading in Resmed securities, regardless of whether the employee has material, non-public information.

Prohibited transactions include:

- Trading inputs or call options
- Short sales
- Buying Resmed securities on margin, borrowing against any account in which Resmed securities are held, or pledging Resmed securities as collateral for a margin or other loan
- Hedging transactions in Resmed securities, such as collars, forward sale contracts, equity swaps or any other financial instrument designed to hedge or offset a decrease in

  the market value of Resmed securities

Any questions about the materiality of the information you may possess, or about trading Resmed's securities, should be promptly brought to the attention of the Legal department.

This section summarizes our policies regarding trading in Resmed securities. We have a more detailed specific policy on insider trading that is located on the Legal department SharePoint site. Please review that policy, which will control if there is any difference between it and this summary. You should also be familiar with the Resmed Regulation Fair Disclosure Policy, which guides Resmed's disclosure of business information to stock market analysts and others who follow Resmed's performance, and is also available on the Legal department SharePoint site.



Company employees are prohibited from recommending, "tipping" or suggesting that anyone else buy or sell stock.

# 07
# Proper use of company assets

Employees should protect Resmed's assets and use them only for legitimate business purposes or personal use as permitted by the Company.
Theft, carelessness and waste have a direct impact on Resmed's profitability and stakeholder trust. The use of Company funds or assets, whether or not for personal gain, for any unlawful or improper purpose is prohibited. To ensure the protection and proper use of Resmed's assets, each employee should practice proper asset protection and use, as found on the table on the right.

Company property refers to computers and smart devices and also includes all data and communications transmitted to, received by or contained in Resmed's electronic or telephonic systems. To the extent permitted by applicable law, Resmed may monitor electronic and telephonic communications without any notice to you. These communications may also be disclosed to law enforcement or government officials.

| What you should do: |
| --- |
| Exercise reasonable care to prevent theft, damage or misuse of Company property |
| Report the actual or suspected theft, damage or misuse of Company property |
| Use Resmed's systems, other electronic communication services, written materials and other property primarily for business-related purposes and in accordance with applicable IT policies |
| Safeguard all electronic programs, data, communications and written materials from inadvertent access by others |
| Use company property only for legitimate business purposes as authorized in connection with your job responsibilities or personal use as permitted by Resmed |



Company property also includes all data and communications transmitted to, received by, or contained in Resmed's electronic systems.

# 08

# Managing customers and suppliers

All employees should deal fairly and honestly with their fellow employees and with the Company's customers and suppliers. Employees should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of important facts or any other unfair dealing practice.

## Relationships with customers

Our business success depends upon our ability to create lasting customer relationships. The Company is committed to dealing with customers fairly, honestly and with integrity. Specifically, you should keep the following guidelines in mind when dealing with customers:

- Information we supply to customers should be accurate, complete to the best of our knowledge and comply with applicable regulatory requirements. Employees should never deliberately misrepresent information to customers.
- Employees should not refuse to sell, service or maintain products Resmed has produced simply because a customer is buying products from another supplier.
- Employees should not provide entertainment or other benefits that could be viewed as an inducement to or a reward for customer purchase decisions. Local laws may strictly limit the kinds and amount of benefits provided to customers. Of course, use of a third party to provide a benefit that would otherwise be improper is also not allowed.
- Any information we receive from customers regarding patient health care should be kept confidential and protected from unauthorized access or disclosure.



## Relationships with suppliers

Resmed deals fairly and honestly with our suppliers. This means that our relationships with suppliers are usually based on the value derived, which can be price, quality, service and reputation, among other factors.

Employees working with suppliers must be objective and be vigilant of the following factors which may cause bias:

1. Personal benefits and improper incentives received from suppliers including gifts, excessive meals, entertainment, trips, free products or services, grants and scholarships.
2. Personal relationships including family, friends or close contacts that may bias the selection process.
3. Conflicts of interest as covered in section 3.

If you have doubts about your actions or a sourcing situation, seek help by contacting the Global Ethics and Compliance department at EthicsOffice@ Resmed.com.

Our Global Third Party Code of Conduct sets forth Resmed expectations for suppliers doing business with us, including acting in strict compliance with all applicable laws and regulations, and holding inclusion and belonging in their code of conduct and business practices.

Our business success depends upon our ability to create lasting customer relationships.

# 09

# Belonging, inclusion and diversity

At Resmed, belonging, inclusion, and diversity work together to help us build better teams, foster innovation, and improve the lives of the people we serve. Diversity reflects who we are and the perspectives we bring, embracing differences and uniting strengths to achieve more together. Inclusion is how we act through the everyday behaviors, decisions, and practices that ensure those perspectives are heard, valued, and applied. Belonging is the outcome we strive for, creating a culture where people feel respected, connected, and able to contribute fully.

Belonging, inclusion, and diversity are core to how we bring Resmed's values and behaviors to life and are essential to a respectful and high-performing workplace. They help employees feel heard, valued, and supported while enabling Resmed to best serve patients worldwide through teams that bring diverse experiences, perspectives, backgrounds, and ways of thinking. Everyone has a role in creating a culture of trust, psychological safety, collaboration, and respect, where employees can speak candidly, challenge assumptions, learn from one another, and contribute to better outcomes.

BIDS is embedded across Resmed in how leaders lead, how teams collaborate, how we hire and onboard, how we design policies and practices, how we listen to employees, and how we serve our customers. It is supported through leadership practices, inclusive learning, accessibility and disability inclusion,

## Our practices of belonging, inclusion and diversity for success (BIDS) enable us to unlock the strengths of our people to transform healthcare and improve lives.

employee listening, product and customer experience partnerships, and employee communities and engagement. of our Employee Resource Groups (ERG) and their leaders and Executive Sponsors. Our BIDS team works cross-functionally enterprise-wide and consults on sourcing strategies, people development content, people practices, vendor selection, government reporting, and more. This enables us to ensure fair and equitable practices are being considered.

Belonging, inclusion, and diversity also shape how we show up in the communities where we live and work. Through Corporate Giving, volunteering, and community partnerships, employees can give back in ways that connect to Resmed's mission, including sleep and respiratory health, health equity, and broader community impact. These efforts help employees live our values beyond the workplace while strengthening connection, purpose, and shared responsibility. By supporting the communities around us, we extend Resmed's commitment to care through service, partnership, and meaningful contributions that improve lives.

Employee-led communities, known as Employee Resource Groups (ERGs), help put these commitments into action by strengthening belonging and creating opportunities for employees to connect, learn, develop, and give back. Any employee across the organization can participate in an ERG and demonstrate support, respect, interest, and curiosity. These communities bring employees together across shared experiences, interests, backgrounds, cultures, life stages, abilities, and regional perspectives while providing learning opportunities, mentorship, community impact initiatives, and leadership development. Employees should refer to the HUB for the most current list of available groups and ways to get involved.

Building this culture is a shared responsibility. This includes engaging in employee-led communities, participating in learning opportunities, supporting inclusive practices, mentoring others, giving back, and volunteering in the communities where we live and work. It also means listening thoughtfully when others share their perspectives and experiences and taking action when behaviors do not align with our values.

We promote belonging through active listening, kindness, and respect and provide channels for employees to share feedback or raise concerns when their experience does not reflect the culture we strive to create. Resmed is committed to providing a safe, respectful, and inclusive workplace. We do not tolerate discrimination, harassment, hate, racism, microaggressions or other behaviors that undermine the dignity, safety, or belonging of any employee.

We proudly support the building of an inclusive workplace so we can support more diverse teams.



## Inclusion is embedded in our values and guides how we serve our people and communities.

We aim to see this transformed into our overall language, our day-to-day conversations, in our practices, and in our communications, written policies and procedures.

If you experience or observe conduct that is in violation of this policy, please bring your concern to your Manager, or to a member of the PeopleTeam or any member of Senior Management as soon as possible. At Resmed we take such violations very seriously and stand by our commitment to a psychologically safe and inclusive workplace for all people. Additionally, the Ethics Reporting Hotline offers team members a confidential way to report any form of prohibited harassment or discrimination. Callers may identify themselves openly, remain anonymous as permitted by laws or request confidentiality.

# 10
# Artificial Intelligence and Emerging Technologies

Resmed is committed to the responsible, transparent, and ethical use of artificial intelligence (AI) and other emerging technologies in a manner that reflects our values and supports quality, integrity, innovation, and patient safety. As AI becomes increasingly integrated into our products, services, operations, and business processes, employees are expected to use these technologies responsibly and in accordance with applicable laws, regulations, Company policies, and governance requirements.

Resmed's AI Principles help guide the design, deployment and use of AI across the Company. These principles reinforce our commitment to responsible innovation, life-changing impact, safe innovation and quality assurance, inclusive care, human-centered AI, trust by design, and accountability and governance. Employees are required to follow these principles when using AI in support of ResMed's mission and values.

## Use of AI Tools

When using AI tools or platform, employees are required to follow some essential guidelines for AI productivity:

**Use only Approved AI Tools**
Employees must use only AI tools and platforms that have been approved through Resmed IT Procurement process. Resmed AI tools should only be used with Resmed-managed computers, environments, and IDs.

**Follow ResMed's Acceptable Use Requirements**
AI must be used in a manner that is lawful, ethical, professional, and consistent with Resmed's Code of Conduct and Acceptable Use requirements.

**Protect Data, Privacy, and Confidential Information**
Employees must be careful about the information provided to AI systems. Any confidential business information, intellectual property, and other sensitive data may only be used in accordance with applicable regulations, policies and approved AI environments.

**Trust, but Verify**

Users remain responsible for the accuracy, completeness, and appropriateness of any AI-generated output. Before relying on AI-generated content, verify facts, check sources, validate assumptions, and apply appropriate human judgment.

**Use AI to Drive Innovation Responsibly**

Employees are encouraged to explore, experiment, and use AI to solve problems, generate ideas, collaborate, and improve productivity. Resmed encourages employees to keep building their AI skills, participate in trainings, read updates, share useful practices so Resmed can continue improving how GenAI is used across the company.

Additional guidance regarding the use of AI may be provided through Resmed policies, standards, procedures, training, approved technology processes, governance requirements, and Resmed's AI Principles. Employees are expected to remain familiar with guidance applicable to their roles and responsibilities.

## Intellectual Property

Employees are expected to respect intellectual property rights when using AI technologies and to use AI-assisted content in a manner consistent with applicable intellectual property laws and Company requirements. Care should be taken to avoid inappropriate use of third-party intellectual property or disclosure of Resmed proprietary information, trade secrets, source code, or confidential materials



Internal Use

# 11
# Other laws and regulations

Every employee must comply with the laws, regulations and rules that apply to Resmed's business. Important examples of the legal requirements that apply to Resmed are discussed further below. Of course, each employee is expected to be familiar with applicable laws of the country where Resmed is doing business. If you need help, contact the Global Ethics and Compliance department or the Legal department.

## Anti-corruption: dealing with government and public officials

Various laws in the countries in which we do business, like the United States Foreign Corrupt Practices Act, the Organization for Economic Co-operation and Development (OECD), the United Kingdom Bribery Act and the Brazilian Anti- Corruption Act make corruption a very serious matter. Anti-bribery laws also typically apply outside the country that adopted a particular law. For example, the U.S. Foreign Corrupt Practices Act applies outside the United States, and the UK
Bribery Act applies outside the UK, so employees in Europe may be subject to both laws. Some laws, such as the UK Bribery Act, also prohibit bribes to the private sector in addition to public officials. Violations of the laws against bribery and corruption can result in serious fines for Resmed and prison sentences for individuals.

Therefore, it is a violation of Company policy to give anything of value (gift, services or entertainment) for the purpose of improperly obtaining or retaining business, influencing the performance of official duties, or any other improper purpose or business advantage. It is just as unlawful to ask or knowingly assist someone else – an agent or a third-party consultant – to give gifts or to make any payment that would be improper for Resmed to do directly. These restrictions cover even payments of small amounts to ensure or speed up the proper performance of a Government Official's routine duties (sometimes referred to as "facilitating payments"). If you have questions about local practices and whether these restrictions cover legitimate and lawful payments, please contact the Global Ethics and Compliance department or your local Legal department.

Finally, and except as approved in advance by the Chief Executive Officer, and subject to review by Resmed's Global General Counsel, Resmed prohibits political contributions by Resmed or by employees on behalf of Resmed. This includes contributions of Company funds or assets for political purposes, pressuring employees to make political contributions or reimbursing employees for political contributions.



Internal Use



## Competition and fair dealing

We outperform our competition fairly and honestly. We seek competitive advantage through superior products and services and great performance, not through unethical or illegal business practices. Generally speaking, competition laws govern Resmed's business dealings with customers and competitors and prohibit anti-competitive agreements such as agreements with either a customer or competitor to fix prices, divide markets or rig a bid. Further, adopting sales or contractual practices that could be viewed as restrictive, coercive or heavy-handed should also be carefully considered before being employed. Violations of competition laws can result in serious consequences for Resmed and the employee, including fines and imprisonment, civil damages, and harm to our reputation.

Ask for immediate help from your local Legal department if you learn of discussions with a competitor involving prices, pricing formulas, costs or profits; contract bids, marketing plans or sales territories; terms and conditions of sale; or allocation of customers, territories or product lines.

A final caution: competition laws are complex, and they can vary worldwide, often leading to different answers to the same question depending on the country in which Resmed is operating. If you have any question about whether your actions might violate local competition laws, please contact your local Legal department.

All employees should deal fairly and honestly with their fellow employees and with Resmed customers and suppliers.

## Intellectual property and trade secrets

Resmed's success is built on the innovation and premium performance of our products.
Much of our innovation is protected by intellectual property laws. We are committed to protecting the Company's intellectual property. Similarly, we respect the valid intellectual property rights of third-parties (including but not limited to our competitors). The rules with respect to intellectual property protection and infringement vary from
country to country, so you should seek advice from the Legal department if you are concerned about potential infringement of our rights or of third
party rights by our products. Examples of activities that could violate intellectual property rights of others include:

- Installing computer software without a proper license
- Adopting a name or advertising slogan already in use by another company
- Distributing articles from scientific journals, newsletters or magazines without permission
- Failing to act if you receive information that Resmed may be infringing on a patent held by a third party

Trade secrets typically consist of confidential information with a continuing value to a business. Stealing trade secrets is a crime in the United States and is generally prohibited by the laws of every country in which Resmed does business. You should be vigilant about protecting Resmed's trade secrets, and never seek to take trade secrets from a third party (including but not limited to a competitor). In particular, when interviewing or engaging with former employees, suppliers or customers of a competitor, you must be careful not to ask about – or accept – confidential information that may be trade secrets of
the competitor.

If you are concerned that Resmed has been exposed to another company's trade secrets, please contact your local Legal department immediately. If you become aware of any public disclosure of patient information, or any attempt by an outsider to "hack" or steal patient information held by Resmed, report that event to your local Legal department immediately.

## International trade

Many countries regulate international trade matters, such as imports, exports and international financial transactions. Countries may adopt restrictions for many different reasons, including national security and foreign policy. In particular, the United States bars trade with certain countries that are considered hostile to the United States and its allies. The rules against United States companies doing business with certain countries – or designated foreign nationals in those countries – is addressed by the United States Office of Foreign Assets Control. If you have any question about whether Resmed is permitted to do business with a particular country, consult your local Legal department.

As a global company, Resmed is committed to respecting the import and export laws of the countries in which we do business. This means that sometimes Resmed is limited as to where or

how we supply our products and services. If your work involves the supply and shipment of products, technologies or services across international borders, make sure you keep up to date with the rules that apply to Resmed, always use complete and accurate import and export documentation, and check with trade compliance personnel in the shipping department if you are unsure about a particular sale or shipment.

## Money laundering

People involved in criminal activities may try to "launder" the proceeds from their crimes to hide them. With the advent of global terrorism, more than 100 countries have laws against money laundering, generally prohibiting companies from accepting or processing the illegal profits of criminals and terrorists.

To comply with these laws, Resmed chooses to do business only with reputable customers and suppliers who are involved in legitimate businesses. To avoid the risk of money laundering, employees should be careful when dealing with businesses that use the kinds of payments that have become associated with money laundering like multiple money orders, use of travelers' checks, crypto-currency, payments in cash or funds received from an unidentified third party. If you suspect that Resmed has been exposed to money laundering, contact the Global Ethics and Compliance department, the Legal department and the senior financial officer in your region immediately.



All employees should be careful when dealing with businesses that use the kinds of payments that have become associated with money laundering.

## Sustainability and environmental stewardship

Resmed is committed to conducting business responsibly and reducing the adverse environmental impacts of our operations, products and value chain. We work with employees, suppliers, customers and other stakeholders to support sustainable business practices and continuous environmental improvement.

We comply with applicable environmental laws, regulations and company requirements wherever we operate. We also seek opportunities to further improve resource efficiency, reduce waste, prevent pollution, reduce emissions and support sustainable innovation.

Employees are expected to:

- Understand and comply with environmental requirements relevant to their role.
- Complete required training and support Resmed's environmental objectives.
- Use resources responsibly and consider environmental impacts when making business decisions, when appropriate. help identify opportunities to reduce waste and environmental impacts.
- Promptly report environmental incidents, non-compliance concerns or environmental risks that they become aware of.

Resmed is committed to reducing greenhouse gas emissions, addressing climate-related risks and opportunities, and designing products and solutions that help improve health outcomes while reducing environmental impacts across their lifecycle.

We also expect our suppliers and business partners to operate responsibly, comply with applicable environmental requirements, and support sustainable business practices throughout our value chain.

For more information, please reach out to sustainability@resmed.com.

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## Respecting Human Rights

We firmly stand for the protection and promotion of human rights. Our business operations and supply chains are multifaceted, yet we are dedicated to uncovering any potential or actual negative effects our activities may have on human rights of individuals within our own operations and supply partners. Where appropriate, prevention, mitigation and remediation will be implemented. We continue to enhance our governance frameworks to ensure effective oversight, accountability, and integration of human rights considerations across our operations and supply chains.  All Resmed employees are expected to uphold human rights of others. Resmed also expects its suppliers to act in accordance with similar standards as outlined in our Global Third Party Code of Conduct.

For more information, please reach out to sustainability@resmed.com.

# Interactions with healthcare professionals



At Resmed, we are committed to adhering to applicable laws governing our relationships with healthcare professionals, many of which are also our customers. Our engagement, marketing, promotional, clinical research and educational activities need to be consistent with governing laws regarding the appropriate promotion of our products in each country in which we operate. Some countries, like the United States and France, even require Resmed to publicly report every “transfer of value” (gifts, meals or entertainment) to any licensed physician or teaching hospital. These same rules usually apply to organizations that Resmed supports for clinical research.

We should not use any inappropriate inducement, payment or personal benefit to encourage a healthcare provider to recommend, prescribe, purchase, supply, sell or administer Resmed products. Improper incentives may include excessive meals, entertainment, trips, gifts, free products or services, grants and scholarships.
On occasion, we may provide educational items, modest meals or other items of value in accordance with our policies and procedures and consistent with local laws and regulations.

It is also appropriate for us to enter into arrangements with healthcare professionals for legitimate activities, including consulting arrangements, professional meetings and speaking engagements, clinical studies and publications, research, grants and donations.

We may only enter into such arrangements with healthcare professionals in line with the Code, company policies and local laws. It is also important to remember that many healthcare professionals are considered government or public officials, both inside and outside the U.S., due to the worldwide predominance of state-run healthcare systems and hospitals under government sponsorship and control. If you believe that gifts or other payments to healthcare professionals or existing or potential customers are somehow improper, please report that information to your supervisor or to the Global Ethics and Compliance department immediately. If you are considering a promotion or engagement that could be viewed as improperly influencing a customer or healthcare provider, please consult the Global Ethics and Compliance department or your local Legal department before you proceed.

## Health and safety

We are committed to protecting the health and safety of each Resmed employee. No task is so important that it cannot be done safely. A safe and secure work environment also means a workplace safe from illegal drugs and violence. The laws in the various countries where we do business are very specific with respect to our obligations to keep our employees safe. If you have questions about a situation that may pose a risk to the health and safety of an employee, raise it with your supervisor immediately.

## Quality

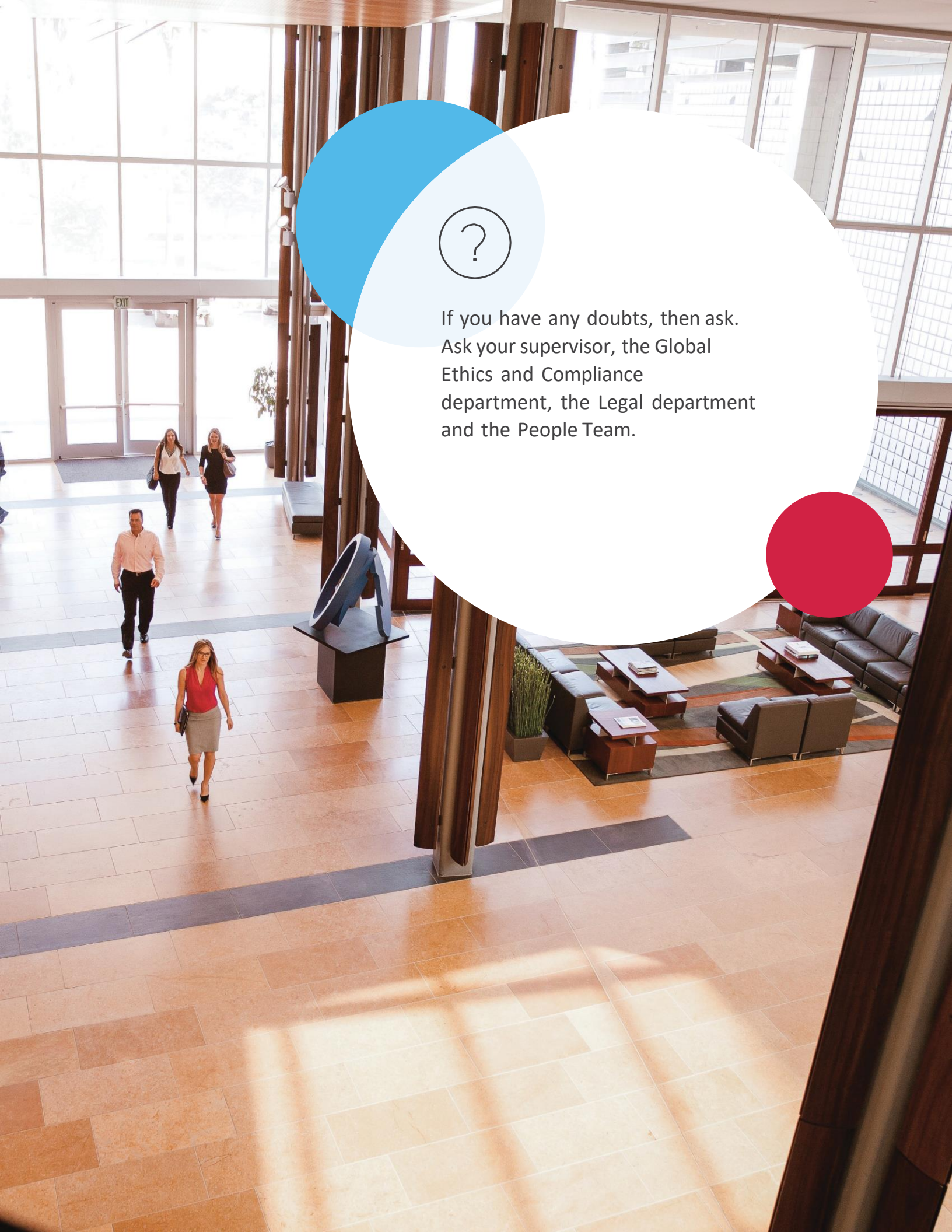
Our commitment to quality, innovation, regulatory compliance and continuous improvement, is stressed in our approach to global quality. Our employees are expected to complete training in those areas of our quality management system that are applicable to their role. Our employees are also trained in good manufacturing practices, which guide our everyday behaviors in medical device manufacturing. Each of us is individually and collectively responsible for the quality of Resmed's products. If you observe deviations from the established quality standards at Resmed, please report them to your supervisor.



# Summary

To summarize, this Code, and the many policies it references and which apply to our day-to-day work for Resmed, will provide guidance on many of the situations we face. But we cannot answer every question, in advance, with a Code of Conduct or a policy. So if you are in doubt about whether your actions are consistent with Resmed's commitment to the highest standard of corporate ethics, then ask. Ask your supervisor, the Global Ethics and Compliance department, the Legal department or the People Team. There is no excuse, when faced with a difficult decision, for not asking for help from our many resources. The bottom line is that Resmed trusts and expects our employees to do the right thing.

In addition to the guidelines set out in this Code, other more detailed procedures apply to members of Resmed's board of directors, executive officers and certain other designated individuals. These procedures are separately communicated to affected persons. If you have any questions about these other procedures, please contact the Global Ethics and Compliance department by sending an email to EthicsOffice@Resmed.com.




If you have any doubts, then ask. Ask your supervisor, the Global Ethics and Compliance department, the Legal department and the People Team.




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