

- *C O N F I D E N T I A L* -



## **ITAMAR MEDICAL LTD. AND ITS AFFILATES**

### **CODE OF ETHICS AND BUSINSS CONDUCT**

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**IMPORTANT:** This Code is designed to implement the laws to which we are all subject, but it may, in some respects, go beyond legal obligations. In addition, this Code does not, and does not purport to, contain any legal advice. To the extent the laws applicable to you are stricter than the standards that apply to you pursuant to this Code, this Code is not purported to derogate from such laws and should not be understood as such. For the avoidance of doubt, in the event of any inconsistency between this Code and the local laws applicable to you, the latter will govern. Lastly, this Code is designed solely for the benefit of Itamar Medical Ltd. and its affiliates and none of the provisions of this Code are intended to provide any rights or remedies to any person other than Itamar Medical Ltd., its affiliates and its successors and assignees (if any).

# CODE OF ETHICS AND BUSINESS CONDUCT

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## 1. Our Code of Ethics and Business Conduct

### 1.1. Introduction

The value of uncompromising ethics, honesty and integrity, strict compliance with applicable laws and full, fair and accurate disclosure are the foundations of the relationships of Itamar Medical Ltd. and its affiliates (together, “Itamar,” the “Company” or “we”) with customers, suppliers, business partners, shareholders and the relationship among personnel within Itamar. Itamar is committed to promoting integrity, honesty and professionalism and maintaining the highest standards of ethical conduct in all of the Company’s activities. The Company’s business success is dependent on the Company’s reputation for integrity and fairness. We must, therefore, ensure that these values are a key element of the Itamar culture.

This Code of Ethics and Business Conduct, which we refer to as this “Code”, is intended to cause all of us, employees, officers and directors, to appreciate the importance we place on ethical business conduct and to map out the kind of company we want to be. In particular, the purpose of this Code is to establish policies and guidelines that deter wrongdoing and ensure that and/or promote:

- honest and ethical conduct, including the ethical handling of actual and apparent conflicts of interest between personal and professional relationships;
- full, fair, accurate, timely and understandable disclosure in reports and documents that we file with, or submit to, the U.S. Securities and Exchange Commission (“SEC”), the Israel Securities Authority (“ISA”), the Nasdaq Capital Market Stock Exchange (“Nasdaq”) the Tel Aviv Stock Exchange (“TASE”) and in other public communications made by us;
- compliance with applicable laws, rules and regulations in any and all territories in which we operate;
- that corporate opportunities are seized by Itamar (rather than by individuals for personal gain);
- the confidentiality of information entrusted to our directors, officers and employees;
- protection and proper use of Itamar’s assets;
- enforcement and compliance with, including accountability for adherence to, this Code; and
- prompt internal reporting of violations of this Code to an appropriate person or persons identified in this Code.

### 1.2. Who is subject to this Code?

This Code applies to all employees, consultants working over 25% FTE for the company, officers and directors of Itamar, which we refer to from time to time as “we”, “you”, “Itamar personnel”, “Itamar people”, or “people of Itamar”.

The Company’s Human Resources department is required to present the Code to all Company employees, officers, consultants working over 25% FTE for the company and directors, who will be asked to sign the Certificate of Compliance attached to this document when joining the Company and thereafter every 12 months. The signature on the Certificate signifies that: (1) the employee has read this Code and has agreed to act in full compliance with its contents ; (2) the employee acknowledges that requesting or pressuring a Company employee to violate the Code

is prohibited; and (3) the employee is not aware of any violation of the Code by any Company manager or other employee and that should the employee become aware of such violation after signing this certificate, he or she is obliged to report the conduct to the Company's General Counsel.

*1.3. What should I do if this Code is not clear to me?*

If you have any questions about this Code or if you face any dilemmas in connection herewith, please talk to your supervisor, Itamar's General Counsel, or any of the other resources identified in the section entitled "Report your Concerns and Non-Compliance" below, as applicable. Whenever you are in doubt as to the applicability of any provision of this Code, you should seek advice, and until then, abide by the stricter interpretation.

***Note: This Code contains several examples which are provided for illustration purposes only and are not, and should not be construed as, derogating from the general rules or guidelines set forth in this Code.***

*1.4. Will this Code be updated?*

This Code may be modified or supplemented from time to time with the approval of our Board of Directors, in which case we will furnish to you the modification or supplement. We may also choose to issue from time to time additional policy memoranda that will further explain or clarify the standards and guidelines in this Code. If applicable, the Company will report any changes to this Code to the full extent required by the rules of the TASE, SEC and the Nasdaq.

*1.5. Where can I find this Code?*

A copy of this Code is available on our Website at [www.itamar-medical.com](http://www.itamar-medical.com) or upon request from Itamar's HR Administrator at Tel: 972-4-6177000.

## **2. Integrity and Ethical Conduct**

Ethics are a set of moral principles or rules of conduct. This Code and your compliance with it will assist you to distinguish between right and wrong, and to appreciate the manner in which we do business at Itamar. We expect that all Itamar personnel will uphold these principles. Since this Code does not purport to provide answers to all questions that might arise, Itamar must rely on you to exercise common sense and good judgment of what is right; when in doubt, you are encouraged to seek guidance and express any concerns you may have regarding this Code.

*2.1. Conflicts of Interest*

A "conflict of interest" occurs whenever your personal or private interests interfere or may interfere in any way, or appear to interfere, with the interests of Itamar as a whole. Although you are generally free to engage in personal business and other activities outside Itamar's ordinary business hours, this freedom is not unlimited, and you should generally avoid conflicts of interest. Therefore, an employee, officer or director must avoid any action that may involve, or may appear to involve, a conflict of interest with the Company.

A conflict of interest can arise when you undertake actions or have interests that may make it difficult to perform work objectively and effectively, without considerations of self-interest and in accordance with the best interests of Itamar. Conflicts of interest may also arise when you or a member of your family receives improper personal benefits as a result of your position in Itamar, whether received from Itamar or a third party. If such a situation arises, you must disclose such potential conflict to the Company's General Counsel for review. Disclosure of any potential conflict is the key to remaining in full compliance with this Code.

## 2.2. *Can I receive or give gifts?*

We recognize that small business gestures are part of doing business in a civilized way and that, when operating globally, sensitivity to cultural differences must be maintained. Nevertheless, you should apply common sense to any gratuity and, in any case, refuse any improper benefits, for yourself, or any other legal entity you have a material (>5%) ownership or for your relatives. For further guidance, please refer to the Company's Anti-Bribery and Corruption Policy.

Notwithstanding the above, the laws of many jurisdictions limit, and often prohibit, giving gifts (even token gifts or Company-identified items) and other things of value to government officials or healthcare professional benefiting from government reimbursement (e.g., meals, travel and accommodations, entertainment, charitable donations made at the direction of a government official), their staffs and the families of both. Itamar personnel must strictly comply with such laws and follow the Company's Anti-Bribery and Corruption Policy as well as the US and other governments anti-kickback laws and regulation when providing gifts or anything of value to such persons and comply with any other policies and procedures established by their department.

**See also “Compliance with the Law,” below and our “Anti-Bribery and Anti-Corruption Policy”.**

## 2.3. *Can I use my position to help friends or family members or legal entities I have material ownership in do business with Itamar?*

If your friend or family member represents a good business opportunity for us, you should report the conflict to your superior as described above and abstain from being unduly involved in the decision process. Please note that in some cases, such as if you are a director or executive officer of the Company, the matter may be brought for the consideration of our Audit Committee, Board of Directors or even the shareholders, as required by applicable law.

## 2.4. *Can Itamar provide me with loans?*

We believe that, in general, providing loans or guarantees to Itamar personnel for personal reasons may present a conflict of interest. In general, Company may provide loans to employees only in accordance with the Company's Loans Policy and in modest amounts and will not permit such loans to executive officers (unless approved by the Company's Board of Directors) and directors.

## 2.5. *Employee Relations and Non-Discrimination*

The way that we treat each other and our colleagues affects the way we do business. All of us deserve a work environment where we are respected and treated with decency. This means, among other things, that:

- we will not exploit any forced or involuntary labor;
- we are committed to wage and benefit compensation in accordance with applicable laws;
- each of us should respect the privacy of each other's private lives and Itamar will require you to provide information only as required to operate effectively or otherwise required by law;
- we are an equal opportunity employer and we are committed to retaining the best individuals, without discrimination and regardless of their race, ethnicity, religion, national origin, gender, color, marital status, condition of pregnancy, disability, veteran status, participate in active military reserve, political affiliation or sexual orientation; and
- we strive to maintain an atmosphere where employees are free from any physical, sexual, psychological or verbal harassment, and such conduct will not be tolerated.

**In this respect, see also our “Sexual Harassment Policy”.**

## 2.6. *Environment, Safety and Health*

Itamar is committed to conducting its business in compliance with all applicable environmental and workplace laws, regulations and permits in a manner that has the highest regard for the safety and well-being of its employees, customers and the general public. Your health and safety as well as the health and safety of our prospective customers and users of our products are paramount to us. Therefore, we are dedicated to providing a safe and healthy work environment and designing, manufacturing and distribution of safe products that comply with required laws, regulations and standards in the respective countries they are sold at. If an employee's work involves compliance with any environmental, safety and health laws, it is the responsibility of the employee to familiarize himself or herself with the relevant laws and regulations, including record keeping.

Accordingly, you should immediately report to your supervisor of any safety or environmental hazards in your workplace or in our products and accidents or injuries.

**In this respect, please also refer to our Environmental, Safety and Health policies and procedures (“Safety Policies”).**

## 3. **Full and Fair Public Disclosure**

### 3.1. *We are a Public Company*

Itamar is a public company and our securities are listed for trading on the Nasdaq Capital Market and TASE under the symbol “ITMR”. This generally means that, in accordance with applicable laws (including exemptions):

- we must keep our shareholders, prospective investors and the public at large, apprised of material information or developments concerning Itamar, regardless of whether or not they are adverse to us, and that our filings with the SEC, Nasdaq, TASE and the ISA be accurate and timely; and
- we cannot engage in “insider trading” or “tipping” of any sort.

### 3.2. *Full, Fair, Accurate and Timely Disclosure*

We need to ensure that public communications about any material events or developments concerning Itamar are full, fair, accurate, timely, understandable and broadly disseminated to the public in accordance with all applicable legal and regulatory requirements. To that end, we have implemented disclosure controls and procedures designed to guarantee this objective as detailed in the Company's Procedure for Avoiding Use of Inside Information and Guidelines for Conducting Transactions Involving Securities (“Insider Trading Procedure”) and the Company's Reporting Procedure.. You can assist us in achieving these goals by, among other things, complying with the following guidelines:

- *Be Accurate:* If you are responsible for preparing our public disclosures, press releases, etc. or provide information to Itamar personnel who are part of this process, you should make sure that such disclosure or information is full, fair, accurate and understandable.

*In this respect, you are encouraged to also read our Reporting Procedure previously circulated to you for additional guidance.*

- *Coordinate Communications:* We designated a limited number of spokespersons responsible for communication of material information or commenting on material developments and, if you are not one of those spokespersons, you should not publicize, disclose or leak any non-public information or respond to inquiries on any material issue. Instead, you should refer any inquiry you receive to such designated spokespersons identified in the Reporting Procedure.

- *Keep Accurate Records:* Itamar’s books and records, including financial statements and reports on which such financials are based, must accurately and fairly present all of Itamar’s transactions in reasonable detail. False and misleading entries in our books and records are strictly prohibited. Itamar personnel are expected to fully cooperate with our internal and external auditors and to refrain from altering or amending any documents or records which are created, sent or received in connection with an audit. Itamar has a financial record management program and records shall be maintained in accordance with applicable statutory, regulatory or contractual requirements, as well as pursuant to prudent business practices. Itamar personnel are prohibited from altering, destroying mutilating, concealing, covering up, falsifying or making a false entry in any record, document, or tangible object with the intent to impede, obstruct, or influence an investigation by appropriate governmental authority or bankruptcy proceeding, or in relation to or contemplation of any such matter, or with the intent to impair the object’s integrity or availability for use in an official proceeding, otherwise obstructing, influencing or impeding any official proceeding or any attempts to do so.

### 3.3. *No Insider Trading*

In the course of your employment or other connection with Itamar, you may become aware of “material non-public information” about us. If you possess such information, you are likely to be subject to trading restrictions. This generally means that you are legally prohibited from trading in Itamar’s securities or making recommendations to anyone (including your family and friends) based on such information, unless such information becomes public or otherwise becomes obsolete and stale. A violation of insider trading laws may lead to civil and criminal penalties against the Itamar employee, officer or director and Itamar will impose disciplinary action, including dismissal, if it learns of a violation of this section by any Itamar personnel.

If you violate insider trading laws, both you and Itamar may be subject to severe civil and criminal penalties.

### 3.4. *What is considered “non-public material” information?*

Information is “non-public” if it has not been the subject of an Itamar press release or other disclosure document (such as Form 6-K or Form 20-F).

Information is “material” if it relates to the business and affairs of Itamar (or its affiliates) that (i) results in, or would reasonably be expected to result in, a change in the market price or value of Itamar’s securities or (ii) a reasonable investor would consider it important in making investment decisions.

Examples of material information include, but are not limited to:

- major corporate acquisitions or take-over bids;
- financial forecasts (increases or decreases);
- changes in auditors or auditor notification that Itamar may no longer rely on such auditor’s audit reports;
- commencement of significant litigation or updates in such significant litigation;
- change in board of directors or senior management; or
- possible award of significant contracts or signing a significant commercial deal.

Insider trading laws may be quite complex. When in doubt, or if questions persist, all Itamar personnel are encouraged to obtain additional guidance from the General Counsel before trading or “tipping.”

**In any event, we urge you to read our Insider Trading Procedure.**

#### **4. Compliance with the Law**

##### *4.1. Comply, Obey, Observe!*

Itamar personnel are required to comply and strictly adhere to both the letter and the spirit of all U.S. and Israeli laws, rules and regulations and those that are applicable in any jurisdiction where Itamar conducts business, including, without limitation, insider trading laws and other fair competition laws.

##### *4.2. Educate Yourself!*

This Code does not summarize, nor does it intend to summarize, all laws, rules and regulations applicable to us or you. As our operations are worldwide, we also must be receptive to the different local laws and rules that apply to our business. Thus, you should become familiar with the applicable laws and regulations that apply to the nature of your work or function. For example, if you are on our accounting team, you should be familiar with IFRS accounting principles.

Additionally, antitrust laws are intended to protect and promote free and fair competition. Both U.S. and Israeli antitrust laws may apply to the Company, as well as similar laws in any other jurisdiction in which the Company does business. Therefore, Itamar personnel should not exchange information with competitors regarding prices or market share and should refrain from exchanging other information that could be construed as a violation of antitrust laws. A violation of antitrust laws is a serious offense. In the United States, it is not uncommon for individuals to be criminally prosecuted. The practice of prosecuting individuals is also developing in Israel.

##### *4.3. International Business*

Many of the countries in which Itamar operates have significantly different laws than those of the United States or Israel. Employees, officers and directors conducting international business must know and comply with the letter and the spirit of the laws of all countries where the Company does business. The Company will also be sensitive to the cultures and customs of the countries where it operates and respect the communities and environments where it does business.

- *Anti-Corruption Laws:* The United States Foreign Corrupt Practices Act (FCPA) as well as the Israeli criminal law and other laws prohibit giving anything of value to officials or political parties of foreign governments in order to obtain or retain business or to gain any improper advantage.

*See also our Anti-Bribery and Corruption Policy.*

- *Export Controls:* It is the Company’s policy to fully comply with all applicable Israeli and U.S. export, customs and trade control laws and regulations, licensing requirements, relevant non-U.S. laws and international sanctions. The Company is responsible for customs, export and trade control compliance and will establish licensing and compliance programs. Any investigation or inquiry by a governmental organization regarding alleged trade control violations or irregularities should be immediately reported to the Chief Financial Officer and General Counsel prior to taking any action. The Chief Financial Officer is available to answer any questions regarding customers, export licensing and trade controls and should be consulted as the need arises.
- *Healthcare Industry Standards and Practices:* The Company’s day-to-day operations consists of complex tools, devices, and technology requiring highly dependent “hands on” interactions with health care professionals and medical institutes. Health care

professionals require training on and an understanding of how to use Itamar's products in a safe and effective way. Our interactions with health care professionals must be held in accordance with the guidelines detailed in this Code and in other applicable regulation and guidelines. It is the Company's policy to follow the AdvaMed Code of Ethics, which is available on <https://www.advamed.org/issues/code-ethics/code-ethics> in its interactions with health care professionals and medical institutes. You are required to refer to the AdvaMed Code of Ethics and become familiar with its provisions.

Together with our partners, we aspire to advance medical care and clinical science through research, product development, and product testing that results in new or improved, innovative medical technology. We provide product service and technical support for health care professionals to help ensure the safe and effective use of our products and we support health care professionals' scientific and medical research, as well as the enhancement of clinical skills and educational opportunities to improve patient care. Therefore, we must abide by the highest ethical standards in everything we do.

We need to review all interactions with health care professionals in light of the above values and should always avoid interactions designed to circumvent the Code. The Code may be silent on a specific interaction or may not address all aspects of an interaction with a health care professional and therefore you are advised to seek guidance in any case of doubt. Itamar personnel are expected to make reasonable and appropriate decisions that align with the values of this code and of AdvaMed Code of Ethics.

If you have inquiries or doubts regarding any applicable laws, you should inquire with the General Counsel in order to verify that a particular action is not prohibited by applicable law.

## **5. Conducting Our Business**

### *5.1. Corporate Opportunities*

You are entrusted with a variety of resources and a wealth of information that Itamar used its best efforts to retain and build. Thus, you are expected to use such resources and information only to promote the business of Itamar and not for personal gain. In light of the foregoing, you are prohibited from taking for yourself or your associates and relatives, opportunities discovered through your position or the use of Itamar's property, resources or information, without our prior approval. See also "Conflicts of Interest" above.

You owe a duty to advance our business interests when opportunity arises, and you are not allowed to engage in business competing with ours, unless you obtain the approval of the Company's President and Chief Financial Officer. . The following examples may be used to illustrate the foregoing:

- If you are part of the purchasing team and become aware of a supplier of components of the type used in Itamar's products, who offers to supply them at a lower price and/or better quality than Itamar's current supplier, you should report it to your superior.
- If you are part of the research & development team and, during the course of employment, you make or conceive of an invention, improvement or other development related to Itamar's business, the same should be reported to your superior.

### *5.2. Confidentiality*

Our confidential information is proprietary to Itamar. If we fail to protect our proprietary rights and secret know-how, we would not be able to compete. If we fail to protect the proprietary rights and secret know-how entrusted to us by others, we would not be able to maintain business relationships. Thus, you must preserve and protect the confidentiality of information entrusted to

you by Itamar, its business partners and customers, except where disclosure is properly authorized or legally mandated.

Where disclosure of confidential information of Itamar is authorized, it should be disclosed only under the protection of a written confidentiality/non-disclosure agreement, unless otherwise permitted by the Company's General Counsel.

Confidential information includes all non-public information that might be of use to Itamar's competitors, or harmful to Itamar or Itamar's customers or vendors, if disclosed. When you receive a document entitled "confidential" or "secret", you can assume that it is confidential to us or our business partner. However, in most cases, confidential information is not labeled as such.

To protect confidential information, it is Company policy that:

- Confidential information should only be disclosed to Itamar personnel who need to use or access such information, on a "need to know" basis;
- Confidential information should be marked with additional handling instructions;
- Itamar personnel should be extra careful when (1) discussing (*if at all, we recommend that you minimize such discussions*) such information in elevators, taxicabs or any place where they can be overheard and (2) reading (*if at all, we recommend that you avoid it*) confidential documents in public places; and
- Itamar personnel should be cautious when using the electronic-mail system, especially when sending an e-mail that contains classified or sensitive information. For example, before sending the "classified" e-mail, you are encouraged to double-check that the recipient is authorized to receive such classified information and that you obtain its exact e-mail address.

### 5.3. *Use and Protection of our Assets*

You must take care to safeguard Itamar's assets. Itamar's assets means tangible and intangible assets, including, without limitation, fixed assets, cash, securities, marketing plans, customer and supplier information, intellectual property, business and financial records.

Safeguarding Itamar's assets includes protecting them from unauthorized use and restricting any use for unlawful or improper purpose. Theft, negligence and waste have a direct impact on our profitability, and you should do your best to ensure that Itamar's assets are efficiently used.

All our assets, information and equipment are to be used only for legitimate business purposes and only by authorized employees, officers and directors or their designees.

## **6. Enforcement of this Code**

Regardless of your role in Itamar or the magnitude of your decisions, you are accountable for your decisions and shall put this Code into practice. One of the reasons for our compiling this Code is to assist you in making the right decisions and in identifying the principal issues that you should consider. Yet, this Code cannot anticipate every possible issue that you may face, and your common sense must be utilized.

In instances where the proper and ethical course of action is unclear, you should seek your supervisor's assistance, the Chief Financial Officer or the input of our General Counsel when faced with tough choices.

We trust that you will do your best to comply with this Code, but please bear in mind that we will take appropriate disciplinary actions for violations of this Code. Such disciplinary actions will be reasonably designed to deter wrongdoing and to promote accountability for adherence to this Code and may include, but are not limited to, warnings, probations, fines, suspensions, demotions and even

dismissals. Disciplinary actions may also extend to the violator's supervisor, insofar as we determine that he or she was also at fault by his or her actions or inactions. Compliance with this Code may be subject to audit by the Internal Auditor and/or the Audit Committee and/or any other representative of Itamar, who, in doing so, will be guided by this Code as well as principles of materiality and relevancy.

## **7. Report Your Concerns and Non-Compliance**

### *7.1. You are encouraged to report violations*

If you know of, or reasonably suspect, a violation of applicable laws, rules or regulations, or this Code or other policies of Itamar, including any evidence of fraud occurring in your region, business division or unit, and that involves any employee or agent of Itamar, you must promptly report such information to your supervisor, a member of senior management or the individuals or offices listed below, as you deem appropriate.

If the matter concerns accounting or auditing issues or if you believe that the nature of the matter requires reporting directly to the Audit Committee of Itamar's Board of Directors (including in events where you believe that your supervisor or other personnel has not properly responded to such information), you shall report such matter directly to the Audit Committee.

### *7.2. Whistleblowers will be protected*

Employees who make reports, in good faith, or assist in the investigation of suspected violations of applicable laws, rules or regulations, or this Code or other policies of Itamar, or regarding accounting or audit issues as described above, to our personnel or Audit Committee, as applicable, will be protected from retaliation, such as demotion or involuntary termination of employment, as a result of their reports.

An employee making the report may also elect to make the report on an anonymous basis, to the Company's whistle blower number at [complaints@itamar-medical.com](mailto:complaints@itamar-medical.com) which will be delivered directly to the Chairperson of the Company's Audit Committee. Such reports should be very detailed or include means to contact the reporting person.

Every reported allegation of illegal or unethical behavior will be thoroughly and promptly investigated. Confidentiality of such reports will be protected, subject to applicable law, regulation or legal proceedings.

**Itamar will not fire, demote, threaten, harass or discriminate against any employee solely because he or she provided information, caused information to be provided or otherwise assisted in an investigation regarding any conduct by Itamar or any Itamar personnel that he or she reasonably believes to constitute a violation of any laws applicable to Itamar.**

### *7.3. Relationship to other policies and laws*

This Code of Ethics and Business Conduct is designed to ensure that you are committed to ethical business conduct and legal compliance. However, the standards embedded in this Code are not the exclusive source of guidance and information on our expectations and should be read together with other laws and policies applicable to you, whether you are an employee, officer or director.

A list of applicable policies and procedures mentioned in this Code:

1. AdvaMed Code of Ethics
2. Anti-Bribery and Corruption Policy
3. Sexual Harassment Policy
4. Loans Policy
5. Reporting Procedure

6. Insider Trading Procedure

7. Safety Policies

7.4. *Waivers of this Code*

Any waiver of this Code for executive officers or directors of Itamar may only be made with the approval of our Board of Directors, or a committee designated thereby. Any such waiver will be disclosed to the public by Itamar in accordance with applicable law.

**LIST OF CONTACTS**

**General Counsel:** Itamar Medical Ltd., [fnoa@itamar-medical.com](mailto:fnoa@itamar-medical.com), 9 Halamish st., Caesarea, Israel. Attn: General Counsel.

**Chief Financial Officer:** Itamar Medical Ltd., [bshy@itamar-medical.com](mailto:bshy@itamar-medical.com), 9 Halamish st., Caesarea, Israel. Attn: Chief Financial Officer.

**Audit Committee:** Itamar Medical Ltd., [complaints@itamar-medical.com](mailto:complaints@itamar-medical.com), 9 Halamish st., Caesarea, Israel. Attn: Chairperson of the Audit Committee.