

ITAMAR MEDICAL LTD.

Code of Ethics for Senior Financial Officers

This Code of Ethics for Senior Financial Officers (this "Code") is designed to promote the honesty, integrity and ethics of the senior financial officers of Itamar Medical Ltd. (including its subsidiaries, "Itamar" or "we"), which include Itamar's principal (chief) executive officer, principal financial officer, principal accounting officer or controller, or persons performing similar functions (the "Senior Officers"). These principles are fundamental to the financial reporting process and the reputation and success of Itamar.

The Senior Officers hold an important role in corporate governance in that they are uniquely capable and empowered to ensure that all stakeholders' interests are appropriately balanced, protected and preserved. Because of this special role, each the Senior Officers agrees to be bound by this Code and will:

- Act with honesty and integrity and ethically handle actual or apparent conflicts of interest in personal and professional relationships involving Itamar or its business;
- Provide information that is accurate, complete, objective, relevant, timely, consistent and understandable to ensure full, fair, accurate, timely and understandable public disclosure in reports and documents that Itamar files with, or submits to, government agencies, including, without limitation, the Securities and Exchange Commission (the "SEC"), and in other public communications;
- Comply with applicable laws, rules and regulations and other appropriate private and public regulatory agencies, affecting Itamar's business and its conduct in business matters;
- In all matters affecting Itamar's business and its conduct in business matters, act in good faith, responsibly, with due care, competence and diligence, without misrepresenting material facts or allowing his/her independent judgment to be subordinated;
- Respect the confidentiality of information acquired in the course of his/her work for Itamar except when authorized or otherwise legally obligated to disclose. Confidential information acquired in the course of his/her work for Itamar shall not be used for personal advantage;
- Proactively promote and be an example of ethical behavior among peers in Itamar's working environment; and
- Achieve responsible use of and control over all Itamar assets and resources employed or entrusted to him/her.

Each of the Senior Officers are expected to adhere to this Code at all times. Any violations shall be promptly reported in accordance with the procedures adopted by Itamar from time to time. If any Senior Officer is found to be in violation of this Code, such person will be subject to disciplinary action, which may include termination of employment. It is against Itamar policy to retaliate against any employee for good faith reporting of violations of this Code.

The Board of Directors (or, if permitted under applicable regulations, and so appointed by the Board of Directors, the Audit Committee) shall have the sole discretionary authority to approve any amendment to or waiver of this Code. Any such amendment to or waiver of this Code may be publicly disclosed in the manner specified by applicable rules, including SEC rules.

This Code is different in nature and scope from the Code of Ethics that was previously adopted and applies to all Itamar employees. Senior Officers should comply with both.

IMPORTANT: This Code is designed to implement the laws to which we are all subject, but it may, in some aspects, 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 more strict 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 and none of the provisions of this Code are intended to provide any rights or remedies to any person other than Itamar and its successors and assigns (if any).