

# DERMALYNX DISTRIBUTION, LLC

## CODE OF BUSINESS CONDUCT & ETHICS

*Our Commitment to Integrity, Compliance, and Patient Safety*

Effective Date: March 19, 2026 | Version 1.0

### A MESSAGE FROM LEADERSHIP

At Dermalynx Distribution, we exist to serve patients — the veterans, wound care patients, and surgical patients whose recoveries depend on the safe and effective delivery of life-changing cellular tissue products. Every sale we make, every contract we sign, every interaction we have with a healthcare provider represents an opportunity to either honor or compromise that mission.

This Code of Business Conduct & Ethics is not a legal formality. It is the written expression of how we expect everyone at Dermalynx to conduct themselves every day. Our integrity as a company is not negotiable — not for a sale, not for a quota, not under any pressure from any source.

We operate in a heavily regulated environment serving government agencies and federal healthcare programs. The standards we hold ourselves to must exceed the minimum required by law. Read this Code. Understand it. Live it.

— *The Management of Dermalynx Distribution, LLC*

## SECTION 1 — OUR CORE PRINCIPLES

### 1 INTEGRITY IN ALL WE DO

We tell the truth — to customers, to government agencies, to regulators, and to each other. We do not misrepresent products, pricing, qualifications, or capabilities. We honor our commitments.

### 2 UNWAVERING COMPLIANCE

We comply with the letter and spirit of every applicable law and regulation — the FDA, the Anti-Kickback Statute, the False Claims Act, HIPAA, FAR, DFARS, and all applicable state laws. Compliance is not optional.

### 3 PATIENT SAFETY ABOVE ALL

Every cellular tissue product we distribute ends up in or on a patient. Our quality standards, our cold-chain protocols, our traceability records, and our supplier qualification exist to protect human lives. We never compromise patient safety.

### 4 RESPECT FOR EVERY PERSON

We treat every colleague, customer, government official, healthcare provider, and member of the public with dignity and respect. We do not discriminate, harass, or demean.

### 5 STEWARDSHIP OF RESOURCES

We are responsible stewards of Company resources and public funds when serving government customers. We do not waste, abuse, or misappropriate assets entrusted to us.

### 6 ACCOUNTABILITY

We take responsibility for our actions and their consequences. We do not make excuses or place blame. When we make a mistake, we acknowledge it, correct it, and learn from it.

## SECTION 2 — OUR OBLIGATIONS TO CUSTOMERS AND PATIENTS

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### 2.1 Honest Representation of Products and Services

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We only make truthful claims about the products we distribute. We do not claim FDA clearance, approval, or regulatory status that a product does not possess. We do not make clinical claims that exceed those supported by the product manufacturer's documentation. We provide accurate product information, including expiration dates, storage requirements, and contraindications.

### 2.2 Product Quality and Integrity

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We take every step necessary to ensure that the cellular tissue products in our distribution chain reach healthcare providers in the condition the manufacturer intended. We do not knowingly distribute expired, damaged, compromised, or recalled products. When in doubt, we quarantine first and investigate before distribution.

### 2.3 Truthful Marketing and Sales Practices

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Our sales and marketing activities shall at all times be accurate, fair, and non-deceptive. We do not:

- Make false or misleading statements about our products, pricing, or services;
- Denigrate competitors using false or unverifiable claims;
- Use deceptive pricing, hidden fees, or bait-and-switch tactics;
- Misrepresent our company's size, capabilities, government registrations, or certifications.

### 2.4 Confidentiality of Customer Information

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We treat all customer information — including purchasing history, patient data (if any), pricing, and business information — as confidential. We do not share customer information with third parties except as required to fulfill orders or as required by law.

## SECTION 3 — OUR OBLIGATIONS TO THE GOVERNMENT

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### 3.1 Accuracy of Government Representations

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All representations made to federal and state government agencies — in contracts, bids, proposals, invoices, certifications, and any other document — shall be complete, accurate, and truthful. Submitting false claims or false statements to the government is a federal crime.

### 3.2 False Claims Act

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The Company and all personnel strictly comply with the Federal False Claims Act (31 U.S.C. §§ 3729-3733). No one may:

- Knowingly submit a false or fraudulent claim for payment to the government;
- Knowingly make a false statement material to a government claim;
- Knowingly make a false statement to avoid paying money owed to the government;
- Conspire to defraud the government;
- Submit inflated invoices, double-bill, or bill for products or services not delivered.

### 3.3 Proper Billing and Invoicing

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All invoices submitted to government customers shall accurately reflect the products delivered, quantities shipped, agreed-upon prices, and applicable contract line item numbers (CLINs). The Company shall maintain complete documentation supporting all government invoices for a minimum of seven (7) years.

### 3.4 Buy American / Trade Agreements Act

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For government contracts subject to the Buy American Act or Trade Agreements Act, we shall distribute only qualifying products and certify compliance accurately. We shall not misrepresent the country of origin of any product.

### 3.5 Protecting Classified and Sensitive Government Information

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In the event the Company has access to any government information marked as classified, sensitive, controlled unclassified information (CUI), or similarly designated, such information shall be safeguarded in strict accordance with applicable government requirements. Unauthorized disclosure is prohibited.

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## SECTION 4 — HEALTHCARE COMPLIANCE

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### 4.1 Zero Tolerance for Healthcare Fraud

Dermalynx Distribution has a zero-tolerance policy for healthcare fraud, waste, and abuse. No employee or agent shall participate in any scheme to defraud Medicare, Medicaid, TRICARE, Veterans Affairs, or any other federal or state healthcare program.

### 4.2 No Kickbacks — Ever

This cannot be stated strongly enough: the Federal Anti-Kickback Statute (42 U.S.C. § 1320a-7b) makes it a felony to offer, pay, solicit, or receive anything of value to induce referrals of business covered by federal healthcare programs. Every sales interaction, every promotional activity, every customer relationship must be structured so that no person could reasonably conclude that value is being exchanged for referrals. When in doubt, consult the Compliance Officer before acting.

### 4.3 Safe Harbor Compliance

Where a business arrangement involves remuneration that could implicate the Anti-Kickback Statute, the Company shall ensure the arrangement falls within an applicable statutory or regulatory safe harbor (e.g., personal services and management contracts, employees, GPO administrative fees) and shall document compliance with safe harbor requirements.

### 4.4 Appropriate Healthcare Professional Interactions

All interactions with healthcare professionals (HCPs) must be compliant with applicable law and Company policy. Permissible activities include educational presentations, product demonstrations, reasonable business meals during a meeting, and provision of product samples as permitted by contract and law. No activity shall be conditioned upon HCP purchasing decisions.

## SECTION 5 — CONFLICTS OF INTEREST AND PERSONAL CONDUCT

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### 5.1 Personal Financial Interests

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Employees and contractors shall not hold financial interests in entities that do business with, or compete with, the Company unless such interests have been fully disclosed and approved by the Compliance Officer. Small, passive investments in publicly traded companies generally do not require disclosure unless the Company does significant business with that company.

### 5.2 Outside Employment

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Outside employment or consulting arrangements with companies that compete with or supply Dermalynx Distribution must be disclosed to and approved by management in advance.

### 5.3 Corporate Opportunity

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Employees and managers may not divert business opportunities that properly belong to the Company for personal benefit or the benefit of third parties. If an employee becomes aware of a business opportunity that the Company could pursue, the employee shall first present it to management before pursuing it independently.

### 5.4 Social Media and Public Statements

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Employees shall not make public statements — whether on social media, at industry conferences, or in any other forum — that disclose confidential Company information, make misleading claims about our products or services, or that could reasonably be attributed to the Company without prior approval from management.

### 5.5 Substance Abuse

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The Company maintains a drug-free workplace. The use, possession, manufacture, distribution, or sale of illegal drugs or controlled substances on Company premises, while conducting Company business, or while operating Company vehicles or equipment is strictly prohibited. Employees shall not work while impaired by alcohol or any substance that affects their ability to perform their duties safely.

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## SECTION 6 — WORKPLACE CONDUCT AND RESPECT

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### 6.1 Dignity and Respect

Every person deserves to be treated with dignity and respect. We do not tolerate bullying, intimidation, threatening behavior, or any form of harassment — sexual or otherwise — in our workplace or in our interactions with customers, suppliers, or government personnel.

### 6.2 Violence-Free Workplace

Violence or threats of violence in the workplace are absolutely prohibited. Any person who engages in violent or threatening behavior shall be subject to immediate termination and may be reported to law enforcement.

### 6.3 Protection of Company Assets

Company assets — including equipment, inventory, funds, intellectual property, and confidential information — exist to serve our business purpose. Employees shall not misappropriate, steal, damage, or misuse Company assets. Company information technology and communication systems are for legitimate business use; incidental personal use is permitted but abuse is not.

### 6.4 Protecting Confidential Information

Employees shall safeguard all confidential Company information — including business strategies, customer lists, pricing, financial data, proprietary processes, government contract information, and personnel records — both during and after employment. Confidential information shall not be disclosed to competitors or other third parties.

## SECTION 7 — ENVIRONMENTAL AND SOCIAL RESPONSIBILITY

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### 7.1 Environmental Compliance

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The Company shall comply with all applicable environmental laws and regulations governing the storage, handling, and disposal of medical products, biologics, and related materials. Expired or recalled tissue products shall be disposed of in accordance with applicable biohazard and medical waste regulations.

### 7.2 Supply Chain Ethics

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The Company endeavors to partner with suppliers and manufacturers who share our commitment to ethical business practices, legal compliance, and respect for human rights. We do not knowingly do business with entities engaged in human rights abuses, forced labor, or other unethical practices.

## SECTION 8 — MAKING ETHICAL DECISIONS

When faced with an ethical dilemma, ask yourself:

1	Is it legal? Would this action violate any law, regulation, or government contract provision?
2	Does it comply with Company policy? Is it consistent with this Code and our Policies & Procedures Manual?
3	How would it look? Would I be comfortable if this decision appeared on the front page of a newspaper or in a government audit report?
4	Would I do it in front of my manager and the Compliance Officer? If not, don't do it.
5	Could it harm patients? Could this decision, directly or indirectly, compromise patient safety?
6	Is it fair and honest? Am I being fully truthful with everyone involved?
7	Am I comfortable with it? Does this decision feel right, or do I have a nagging feeling that something is wrong?

If you answer 'no' to any of these questions, stop and consult your manager or the Compliance Officer before proceeding.

### 8.1 Resources for Reporting and Guidance

- Compliance Officer (primary resource for all compliance questions)
- Direct supervisor or management chain
- Anonymous reporting hotline (details to be designated by management)
- HHS OIG Hotline: 1-800-HHS-TIPS (1-800-447-8477)
- GSA Inspector General for government contracting concerns: 1-800-424-5210

## SECTION 9 — CONSEQUENCES OF VIOLATIONS

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Violations of this Code of Conduct may result in:

- Verbal or written warning;
- Suspension with or without pay;
- Termination of employment or contract;
- Referral to law enforcement;
- Civil litigation by the Company;
- Reporting to applicable professional licensing boards; and/or
- Exclusion from government contracting participation.

The Company reserves the right to determine the appropriate response to any violation based on the circumstances. The Company shall not retaliate against any person who in good faith reports a concern or participates in an investigation.

## SECTION 10 — CODE OF CONDUCT ACKNOWLEDGMENT

I, the undersigned, certify that I have received, read, understood, and agree to comply with the Dermalynx Distribution, LLC Code of Business Conduct & Ethics (Version 1.0, effective March 19, 2026). I understand that compliance with this Code is a condition of my employment or engagement with the Company and that violations may result in disciplinary action up to and including termination.

I further certify that I am not currently excluded, debarred, or suspended from participation in any federal or state healthcare program or government contracting, and that I will promptly report any such action against me to the Compliance Officer.

<b>Signature:</b>  <hr/> <i>Signature</i>	<b>Date:</b>  <hr/> <i>Date</i>
<b>Printed Name:</b>  <hr/> <i>Full Legal Name</i>	<b>Title / Role:</b>  <hr/> <i>Position / Title</i>

— END OF CODE OF BUSINESS CONDUCT & ETHICS —  
*Dermalynx Distribution, LLC | Advancing Patient Care Through Compliance and Integrity*