

# Code of Business Conduct & Ethics

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DERMALYNX DISTRIBUTION, LLC

Effective Date: January 1, 2026

Applicable to: All officers, employees, contractors, and representatives

Classification: Company Confidential

This Code establishes the ethical standards and behavioral expectations for everyone who represents Dermalynx Distribution. Compliance with this Code is a condition of employment or engagement.

# A Message from Leadership

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At Dermalynx Distribution, we believe that how we conduct business is as important as the business we conduct. The tissue product distribution industry demands the highest standards of integrity — not because regulators require it, but because patients depend on it.

This Code is not a formality. It is the foundation of our business. Every interaction, every transaction, and every decision should reflect the principles outlined here. When in doubt, ask. When something feels wrong, speak up. We will always support those who act with integrity.

— *Dermalynx Distribution Leadership*

# 1. Compliance with Laws and Regulations

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All personnel must comply with applicable federal, state, and local laws and regulations, including but not limited to the Anti-Kickback Statute, False Claims Act, Stark Law, FDA regulations governing HCT/Ps, and all applicable state tissue banking and distribution laws. Ignorance of the law is not a defense. When legal requirements are unclear, consult the Compliance Officer before acting.

# 2. Anti-Kickback and Anti-Bribery

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No person acting on behalf of Dermalynx may offer, pay, solicit, or receive anything of value to induce or reward the referral of business, the purchase of products, or the recommendation of the Company's products or services. This prohibition applies to all forms of remuneration — cash, gifts, services, entertainment, travel, meals, charitable donations, sponsorships, or any other transfer of value. All compensation arrangements must be at fair market value, in writing, and for legitimate services.

# 3. Conflicts of Interest

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Personnel must avoid situations where personal interests conflict, or appear to conflict, with the interests of the Company. Potential conflicts include: financial interests in customers, competitors, or suppliers; outside employment or consulting that interferes with Company duties; family relationships with customers or competitors; and accepting gifts or benefits from business partners. All potential conflicts must be disclosed to the Compliance Officer in writing.

# 4. Accurate Books, Records, and Reporting

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All Company records must be accurate, complete, and maintained in accordance with applicable retention requirements. Falsifying records, creating misleading entries, or destroying documents outside of approved retention schedules is prohibited. Financial records must accurately reflect all transactions. Expense reports must be truthful and supported by documentation.

## 5. Confidentiality and Data Protection

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Company information, customer data, pricing, and business strategies are confidential. Personnel may not disclose confidential information to unauthorized parties, use it for personal benefit, or retain it after separation from the Company. Patient health information must be handled in accordance with HIPAA and applicable state privacy laws.

## 6. Fair Dealing and Competition

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Dermalynx competes fairly and honestly. Personnel may not engage in deceptive, unfair, or anti-competitive practices. This includes: making false or misleading statements about competitors; obtaining competitor trade secrets through improper means; price-fixing or market allocation agreements; and any other practice that violates antitrust laws.

## 7. Product Safety and Quality

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Patient safety is paramount. Personnel must immediately report any product quality concern, adverse event, or potential safety issue. No product may be distributed if there is reason to believe it may be adulterated, misbranded, or unsafe. Quality concerns override all commercial considerations.

## 8. Workplace Conduct

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Dermalynx is committed to a workplace free from harassment, discrimination, and retaliation. All personnel are treated with dignity and respect. The Company does not tolerate harassment or discrimination based on any protected characteristic. Every person has the right to work in a professional, respectful environment.

## 9. Use of Company Resources

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Company resources — including equipment, technology, funds, and intellectual property — are to be used for legitimate business purposes. Incidental personal use is permitted if it does not interfere with work, does not violate any policy, and does not result in significant cost to the Company.

## 10. Reporting Violations

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All personnel have a duty to report known or suspected violations of this Code, Company policies, or applicable laws. Reports may be made to the Compliance Officer, a supervisor, or through the confidential compliance hotline. The Company strictly prohibits retaliation against anyone who makes a good-faith report. Retaliation is itself a serious violation of this Code and will result in disciplinary action.

## 11. Consequences of Violations

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Violations of this Code may result in disciplinary action up to and including termination of employment or contract, and referral to applicable regulatory or law enforcement authorities. The severity of discipline will be proportionate to the nature of the violation, whether it was intentional, and whether the individual self-reported.

## 12. Acknowledgment

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All personnel are required to acknowledge receipt and understanding of this Code upon hire and annually thereafter. Acknowledgment does not replace the obligation to read, understand, and comply with all provisions of this Code.

## Acknowledgment of Receipt

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I acknowledge that I have received, read, and understand the Dermalynx Distribution Code of Business Conduct & Ethics. I agree to comply with all provisions of this Code as a condition of my employment or engagement with the Company.

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Signature

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Printed Name

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Date