

CODE OF ETHICS AND BUSINESS CONDUCT

Updated October 2026

STATEMENT OF PRINCIPLES

ADMA Biologics, Inc., its affiliates, and its subsidiaries (collectively referred to as "ADMA" or the "Company") are committed to achieving the highest standards of professionalism and ethical conduct in their operations and activities, and expect their directors, officers, and employees to conduct business according to the highest ethical standards and legal compliance. Individual integrity and a dedicated corporate culture support the Company's Code of Ethics and Business Conduct (this "Code of Conduct"). This Code of Conduct applies to all ADMA directors, officers and employees, as well as certain of ADMA's advisors, consultants, representatives and agents, as applicable (each, a "covered person"), and each covered person is required to be familiar with this Code of Conduct (including all appendices), comply with it, and report any suspected violations of it, as applicable. Furthermore, ADMA's suppliers and distributors are deemed to be "covered persons" under this Code of Conduct solely with respect to the subsections entitled: (i) "Confidentiality" and "Artificial Intelligence" within the "Business Conduct" section; (ii) "Health and Safety," "Human Rights," "Research and Development Compliance" and "Employment Practices / Equal Opportunities" within the "Environment, Health and Safety, Compliance and Employee Welfare" section; and (iii) "Product Promotion" within the "Field-Based Interactions and Patient Advocacy" section, as applicable. Each covered person must strive to protect the Company's reputation for integrity and ethical conduct by conducting themselves accordingly and avoiding even the appearance of improper business behavior.

The Company's Board of Directors (the "Board") has adopted this Code of Conduct in order to:

- promote honest and ethical business conduct, including the ethical handling of potential conflicts of interest;
- promote full, fair, and accurate disclosures in information provided to governmental agencies and made in public communications;
- promote compliance with governmental laws, rules, and regulations;
- promote the protection of Company assets, including corporate opportunities and confidential information;
- promote ethical conduct and prudent use of corporate resources to provide long-term financial value to stockholders;
- promote fair dealing by the Company;
- deter wrongdoing by covered persons; and

- ensure accountability for adherence to this Code of Conduct.

Any director or officer who has any questions about this Code of Conduct should consult the Company's Chief Executive Officer, Chairman, General Counsel, or Corporate Compliance Officer (the "Compliance Officer"). All other employees or other covered persons should address questions about this Code of Conduct to the Compliance Officer.

Compliance with Laws, Rules and Regulations

The Company requires the highest ethical and moral standards in its business conduct, including compliance with all governing laws and regulations. The Company strives to adhere to applicable pharmaceutical industry guidelines, standards, and codes of practice in each jurisdiction where it operates. Covered persons must obey all applicable laws, rules, and regulations of the United States and/or the jurisdictions in which they are conducting business. Compliance with the law includes both following the letter and the spirit of the law. Consequently, business activities should be conducted with the utmost integrity and honesty.

Responsibility and Accountability

Covered persons must ensure that their own conduct, as well as the conduct of their direct reports, is honest, ethical, and compliant with the law and Company policies, including this Code of Conduct. Violations of this Code of Conduct or other ADMA policies may result in disciplinary action, termination of employment or business relationship, as applicable, and/or personal civil or criminal liability.

It is the responsibility of each covered person to read, understand, and comply with this Code of Conduct. All ADMA directors, officers and employees must sign, both upon onboarding and annually, a certification/acknowledgement of compliance with this Code of Conduct. ADMA may also require certain advisors, consultants, representatives, agents, suppliers and distributors to also certify/acknowledge, both upon onboarding and annually, compliance with this Code of Conduct, as applicable, at its sole discretion. However, failure to read this Code of Conduct or sign a confirmation/acknowledgement certificate does not excuse any covered person from complying with this Code of Conduct.

BUSINESS CONDUCT

Conflicts of Interest

Covered persons should always act in the best interest of ADMA, and not permit outside interests to interfere with their job duties. ADMA prohibits all employees from using their position with the Company or the Company's relationship with its clients, customers, vendors, suppliers, or contractors for private gain and/or to obtain benefits for themselves or members of their family.

The Company does not intend to arbitrarily restrict employees' personal activities. The Company intends to make clear that covered persons must avoid all actual or potential conflicts of interest that could influence their judgment in handling Company business or present an unfair advantage to customers and/or business partners.

As a covered person, you have an ethical and legal responsibility to put the interests of the Company ahead of any other personal, business, or commercial interests. Even the perception of a conflict of interest can cause harm to the Company and to the covered person involved. For purposes of this policy, a potential conflict of interest occurs when a covered person's outside interests (for example, financial or personal interests) interfere with ADMA's interests or the covered person's work-related duties. For example, a conflict of interest can occur when a covered person is in a position to influence a decision that may result in a personal gain for the covered person or the covered person's family member as a result of the Company's business dealings.

A director, officer, or employee shall have an indirect interest in a proposed transaction if:

- the other party to the transaction is related to the director, officer, or employee;
- the other party is an entity in which the director, officer, or employee has a material financial interest; or
- the director, officer or employee is an officer, director or general partner of such other party.

A conflict of interest also may exist when the interests or concerns of any director, officer or employee, or their immediate family, or any party, group, or organization to which the covered person has allegiance, may be seen as competing with the interests of the Company.

A conflict of interest may arise where a covered person:

- has interests that make it difficult to perform work for the Company objectively and effectively;
- receives personal benefit as a result of their position with the Company;
- uses corporate property or nonpublic information gained through employment or association with the Company for their own advantage;
- has business or personal interests that compete with the Company's interests; or
- learns of a business opportunity through their association with the Company and discloses it to a third party, does not disclose it to the Company, or invests in the opportunity without authorization from the Company.

Any potential conflict of interest must be disclosed promptly to the Compliance Officer. The Compliance Officer will consider the circumstances and take appropriate action. Any transactions involving a potential conflict of interest for an employee must be cleared in writing by the Compliance Officer. Any transactions involving a potential conflict of interest for an officer or director must be cleared in writing by the Board in accordance with the Company's *Conflicts of Interest Policy* (Appendix A) or, in the event such conflict of interest relates to a Related Party Transaction (as defined in the Company's *Related Party Transaction Policy*), the Audit Committee in accordance with the Company's *Related Party Transaction Policy*. ADMA officers and directors must obtain the approval of the Board, upon recommendation of the Governance and Nominations Committee, before accepting a position as an officer, director, consultant or other service provider of another company or business which may create a conflict of interest.

All covered persons are bound by the Company's *Conflicts of Interest Policy* (Appendix A).

Corporate Opportunities

Covered persons owe a duty to the Company to advance the Company's legitimate interests whenever the opportunity to do so arises. Covered persons should not take for themselves opportunities that arise or are discovered due to their position with the Company or through the use of Company assets or information. Use of the Company's assets, information or one's position for personal gain, or personally competing with the Company, is not permitted.

Covered persons may not participate in any such opportunity or investment without written approval of the Compliance Officer (for employees) or the Board (for officers or directors). A covered person may not use Company property or information, or their position with ADMA for improper personal gain. All covered persons are bound by the Company's *Corporate Opportunity Policy* (Appendix B).

Loans

The Company will not extend credit in the form of personal loans or salary advances to any covered persons.

Entertainment and Gifts

Business decisions should always be made with the Company's best interests in mind. As such, covered persons shall not seek or accept any entertainment, gifts, favors, or money (including loans of money) for themselves or their family members from anyone that may imply conflicts between the interests of the covered person and the Company or otherwise influence objective business judgment. Likewise, covered persons shall not provide costly entertainment, gifts, favors, or money (including loans of money) to others that may imply the same type of conflicts for them. In either situation, covered persons should proceed with the expectation that the act will become a

matter of public knowledge. If a covered person violates this policy, the Company will take prompt and appropriate corrective action, including discipline or termination of employment.

Covered persons may accept novelty or promotional items or modest gifts related to commonly recognized occasions (such as a promotion, holiday, wedding, or retirement) and invitations to a sporting activity, entertainment, or meal if such gift or entertainment has a market value under $100.00, is reasonable and customary in the industry, and does not create an actual or perceived conflict of interest. Covered persons must disclose such entertainment or gifts, regardless of value, to their manager or the Human Resources department.

Political Contributions

The Company will not contribute at any time, either directly or indirectly, to any political campaign, candidates for local, state or federal office, or any political party. Acts of hospitality toward public officials should be of such a scale and nature as to avoid compromising the integrity or impugning the reputation of the public official or the Company. The foregoing applies with equal force to political campaigns, candidates, and parties in any foreign country, to which the Company and its directors, officers and employees will similarly not contribute. The Foreign Corrupt Practices Act, as amended (the "FCPA"), prohibits U.S. companies from exchanging payments or gifts with foreign officials. All covered persons are bound by the Company's *Foreign Corrupt Practices Act and USA PATRIOT Act Policy* (Appendix C).

Insider Trading Prohibited

Since ADMA is publicly-owned, the Company is legally obligated to vigilantly safeguard its Company Material Nonpublic Information (as defined in the Company's *Insider Trading Policy*) from improper disclosure. Under the federal securities laws, it is unlawful for all persons in possession of Company Material Nonpublic Information, including our directors, officers and employees and the Company itself and its subsidiaries, to (i) buy or sell ADMA securities, (ii) improperly disclose or give Company Material Nonpublic Information to others who may trade on the basis of that information, or (iii) advise others how to trade while in possession of Company Material Nonpublic Information. All covered persons are bound by the Company's *Insider Trading Policy* (Appendix D).

Prediction Market Trading

Trading in prediction markets, event contracts, or similar instruments on events relating to the Company or the plasma-derived products industry, whether directly or by tipping others, can create a personal financial interest that conflicts with a covered person's duties to the Company and is strictly prohibited. Such a conflict exists regardless of whether a covered person is in possession of confidential information, and regardless of whether the trading is separately prohibited under the Company's *Insider Trading Policy* (Appendix D).

Communications

As a publicly-owned company, ADMA is obligated to ensure that communications to the public and regulatory agencies are timely, accurate, and transparent. ADMA must comply with the requirements imposed by regulatory agencies, including the U.S. Securities and Exchange Commission (the "SEC"). Covered persons may be asked to provide information necessary to ensure accurate public or regulatory reporting by the Company. The Company expects employees, officers and directors to do their part by promptly providing accurate answers to inquiries from Company employees and agents handling such reporting. Any inquiries from external sources should be redirected to a person authorized and designated to respond on the Company's behalf. All covered persons are bound by the Company's *Corporate Communications Policy* (Appendix E).

Acting In the Best Interest of the Company; Non-Disparagement

It is the responsibility of each covered person to conduct himself or herself in a manner, both publicly and privately, that serves the best interests of the Company and presents the Company and its customers in the best possible light. To that end, covered persons are not permitted to make any statement, publicly or privately, that would disparage the Company or any director, officer or other covered person or that would have a harmful effect on the interests of the Company, any of its customers or its stockholders.

In particular, under no circumstances should any covered person make any statement to the news media that disparages or could appear to disparage the Company, the Company's customers, or the Company's officers, directors or employees. These policies are not intended to restrict covered persons from making statements to fellow covered persons in the course of carrying out their duties with the Company, from making private statements to persons other than customers or competitors of the Company or members of the press or the financial community that do not have a material adverse effect on the Company, or from making statements in good faith that are required by law, regulation or order of any court or regulatory commission, department or agency.

Confidentiality

It is important that you protect the confidentiality of the Company's information. Confidential or proprietary information includes all information that is not generally known to the public and is proprietary to the Company, or would be detrimental to the Company if publicly disclosed. Proprietary information should be marked accordingly, be kept secure and have access limited to those who have a "need to know" in order to do their jobs. As a covered person, you are trusted with such confidential information. You are only to use such confidential information for the business purposes of the Company for which it was intended. Confidential information should not be shared with anyone outside the Company, including family members or friends, or other covered persons who do not need the information to carry out their duties, except when disclosure

is authorized by the Compliance Officer or legally mandated. For the avoidance of doubt, covered persons may not speak with any third party (including, but not limited to, market research companies) about the plasma industry and/or the business of ADMA and its affiliates and subsidiaries, in any capacity, where ADMA's confidential information may be shared, regardless of how much compensation the covered person may receive from such third party. Even release of seemingly harmless information can expose you and your family members or friends, as well as the Company, to civil and criminal penalties. Family members and friends may not fully understand or appreciate the consequences of disclosing or using confidential information. When it is necessary for valid business reasons to disclose the Company's confidential or proprietary information, you should consider executing a confidentiality agreement with the proposed recipient of such information. Please contact the Compliance Officer regarding the appropriateness of a confidentiality agreement with respect to any proposed disclosure.

The Company's business relations are built on trust, and clients, brokers and other companies with whom the Company does business or proposes to do business rely on the Company to maintain and protect this trust. If you learn information from any third party with whom the Company does business or may do business that is not otherwise public, you must keep that information confidential, regardless of whether the Company has executed a confidentiality agreement with such other person. Notwithstanding the foregoing, nothing in this *Confidentiality* section shall restrict a covered person's rights described in the Company's *Whistleblower Policy* (Appendix F), including the right to report possible violations of law directly to the SEC or other government agencies.

All covered persons must be sensitive to the impact of comments made over the Internet through public forums such as chat rooms and bulletin boards. In such forums, you may not post any information about the Company, including comments about the Company's contracts, stock performance, operational strategies, financial results, clients or competitors, even in response to a false statement or question. This applies whether you are at work or away from the office. The Company owns all e-mail or other messages that are sent from or received through the Company's systems. The Company may monitor your messages and may be required to disclose them in the case of litigation or governmental inquiry.

Artificial Intelligence

The use of artificial intelligence ("AI") tools, including generative AI, machine learning models, chatbots, and automation software, in electronic communications must align with the Company's security, confidentiality, and ethical standards. Covered persons are prohibited from using or inputting any sensitive, confidential, or proprietary information relating to the Company into external AI systems. Employees of ADMA are required to abide by the Company's Artificial Intelligence Usage Policy contained in the Employee Handbook.

Fair Dealing

All of the business activities of the Company are highly competitive, and it is the policy of the Company to compete aggressively, but fairly. Accordingly, covered persons must never make a deliberate misrepresentation concerning the Company or its business operations. Management, at all levels, must be informed at all times of matters which might be considered sensitive in preserving the Company's reputation. Concealment of information or false and misleading statements will not be tolerated. Covered persons are prohibited from misappropriating or inducing the disclosure of confidential information from other companies.

Antitrust Issues

In order to avoid potential violations of antitrust laws, the following activities are prohibited:

- Agreements or "understandings" with competitors regarding prices, bids, customers, territories, and other competitive matters.

- Agreements or "understandings" with competitors or customers to "blacklist" or avoid dealings with particular customers, vendors, or suppliers.

- Distributor arrangements that unduly restrict product and/or service selection or pricing available to customers.

- Resale pricing agreements, group boycotts, or product tying arrangements.

- Any attempts to gain an unfair advantage, such as through deception, intimidation, disparagement, bribery, facilitation or "grease" payments (e.g., small sums requested to expedite the performance of a routine function), misappropriation of trade secrets, or coercive reciprocal dealing.

Violations of antitrust laws can result in expensive litigation and substantial penalties, including criminal liability and sanctions.

Books, Records, and Accounting

The Company's books, records, and accounts shall accurately and fairly reflect the Company's transactions and the disposition of its assets. Compliance with accepted accounting rules and controls is expected at all times. All information recorded or reported in relationship with any covered person's employment or association with the Company, whether for the Company or a third party, must be done accurately. All of the Company's records must include reasonable and appropriate detail, be kept contemporaneously with recorded events, and appropriately reflect the Company's transactions and/or activities. All records of transactions must accurately and fully reflect payments made, payment purpose, and products or services provided. Falsifying records

or failing to record transactions is a severe offense and will result in Company discipline, loss of employment and/or legal recourse.

ADMA is a publicly-traded company that is obligated to record and report many business transactions. Information contained in Company records may be provided to stockholders, investors, regulators, and government agencies. For this reason, the Company's accounting records must conform to the Company's internal control and disclosure procedures, as well as generally accepted accounting principles, laws, and regulations. The Company's filings with the SEC must be full, fair, accurate, and timely, and include legally-mandated disclosures.

The Audit Committee of the Board is responsible for ensuring that every covered person can confidentially report any concerns related to the Company's financial statements, reports, or transactions. The Company encourages transparency and honesty in communications with the Board, accountants, third-party consultants and auditors. All personnel must cooperate with and provide requested information to the Board, accountants, third-party consultants and auditors. It is unlawful to fraudulently influence, induce, coerce, manipulate, or mislead the Company's independent public accountants.

Procedures for reporting any concerns related to the Company's financial transactions, records, or reports are set forth in the Company's *Whistleblower Policy* (Appendix F).

Record Retention

All Company records should be maintained in accordance with the Company's record retention policies and applicable laws and regulations. From time to time, the Company may be involved in legal proceedings that require the Company to make certain records available to third parties. The Company's Compliance Officer and external legal counsel will assist in gathering and releasing appropriate information to third parties. If you receive a request for documents or information from a third party, you must forward or redirect the request to the appropriate Company department or the Compliance Officer.

It is unlawful to alter, destroy, modify, or conceal documentation or items that are relevant to a legal proceeding or investigation. All Company documents and information relevant to a legal proceeding or investigation must be retained, including email, personnel files, records and/or reports of transactions, written notes, expense reports, and internal memos. If you become aware of the existence or possibility of a lawsuit, subpoena, or government investigation, you must immediately contact the Compliance Officer and retain all relevant records.

Procedures for the retention of documents and materials are set forth in the Company's *Document Retention Policy* (Appendix G).

ENVIRONMENT, HEALTH AND SAFETY, COMPLIANCE AND EMPLOYEE WELFARE

Environment Generally

All Company employees should strive to conserve resources and reduce waste and emissions through recycling and other energy conservation measures. Employees have a responsibility to promptly report any known or suspected violations of environmental laws or any events that may result in a discharge or emission of hazardous materials.

The Company manufactures, markets and develops specialty biologics for the prevention and treatment of infectious diseases in the immune compromised and other patients at risk for infection, and, as such, the Company considers its environmental impact to be low. There are no significant releases into the environment or greenhouse gas emissions. Further, the Company's activities do not produce any particular noise nuisance for staff or neighboring tenants or residents.

Annual electricity and water consumption are monitored by the Company and factored into the Company's sustainable resource practices.

Waste Management Policy

ADMA's mission is to identify and mitigate risks and hazards with the aim of achieving zero incidents, zero injuries, and zero spills or environmental harm. ADMA is dedicated to the safe handling and management of all non-hazardous and hazardous materials, and all ADMA employees are responsible for appropriate waste management.

ADMA is dedicated to high environmental standards and expects all employees to be familiar with and comply with the contents of this policy. ADMA is committed to providing a safe and healthy work environment. ADMA is dedicated to complying with all applicable laws, regulations, and requirements associated with its environmental obligations and impact. ADMA is committed to the continual improvement of all environmental impact associated with its operations. ADMA is committed to the prevention of pollution in all aspects of business activities, and a sustainable approach to the development and provision of its products and services.

Employee Responsibilities

Each ADMA employee is expected to:

- carry out assigned duties and tasks in accordance with this policy and relevant arrangements, environmental working practices, and ADMA's standard operating procedures (SOPs), including relevant rules and instructions;

- cooperate fully with managers and coworkers to minimize adverse environmental impacts;
- make full and proper use of all equipment provided to minimize adverse environmental impacts;
- become familiar with their worksite's emergency protocols and the location of spill kits;
- report any defects in equipment or systems that they believe are or may become the cause of an adverse environmental impact;
- report circumstances they believe are likely to create an adverse environmental impact; and
- report environmental incidents promptly and cooperate with any associated investigations.

Safe Disposal of Waste

ADMA acknowledges that different materials require different methods for disposal, particularly where waste may be dangerous and/or hazardous. Employees will be instructed on the proper disposal method for any waste they are expected to encounter in the course of their work, including both hazardous and non-hazardous waste.

Recycling and Other Environmentally Friendly Practices

The Company uses ethanol as a raw material in its production process. ADMA has successfully instilled a program where ethanol is recovered from the Company's manufacturing waste process to be reused for energy consumption instead of being incinerated as hazardous waste. Similarly, substantially all of the filter material used in ADMA's manufacturing process is sent for energy recycling rather than being delivered to landfills.

Each of ADMA's plasma collection centers participate in a re-usable sharps program which results in substantially fewer sharps containers being sent to a landfill each week.

Beginning in 2025 on a go-forward basis, as part of its commitment to reducing waste generated from its manufacturing processes, ADMA has decreased its ethanol use by approximately 50% due to process optimization and changes in plasma intermediate offerings, as compared to pre-2025 levels. This decrease in ethanol use has further reduced ADMA's waste generation.

Health and Safety

The Company is committed not only to complying with all relevant health and safety laws, but also to conducting business in a manner that protects the safety of its employees and the communities in which it does business. All employees are required to understand and comply with all applicable health and safety laws, regulations and policies relevant to their positions. If you have a concern about unsafe conditions or tasks that present a risk of injury to you, please report these concerns immediately to your supervisor, the Environmental Health & Safety department, the Human Resources department, or the Compliance Officer. Failure to comply with environmental, health and safety laws and regulations can result in civil and criminal liability against you and the Company, as well as disciplinary action by the Company, up to and including termination of employment. Company suppliers are also expected to implement policies and procedures addressing occupational health and safety for their employees, contractors and other agents.

Human Rights

The Company always considers the impact of its activities and decisions on its people and on those around the Company. The Company strives to always conduct its business in a way that does not lead to any harm to people, whether caused directly or contributed to by the Company, or indirectly through its partners or activities to which the Company is linked.

The Company supports and respects the protection of applicable national and internationally recognized human rights. In its daily business and throughout its operations, the Company supports the principles reflected in international declarations and conventions including:

- United Nations (UN) Guiding Principles on Business and Human Rights;
- UN Universal Declaration of Human Rights (UDHR);
- International Bill of Human Rights;
- UN Global Compact;
- The International Labor Organization's Declaration on Fundamental Principles and Rights at Work; and
- The United Nations Convention against Corruption.

Research and Development Compliance

The research and development of pharmaceutical products is subject to a number of legal and regulatory requirements, including standards related to ethical research procedures and proper scientific conduct. The Company expects employees and suppliers, including its third-party clinical research organizations, to comply with all such requirements.

Patient Safety and Product Quality / Adverse Event Reporting

Patient health and safety is the Company's top priority. All employees are responsible for the quality and safety of Company products, regardless of the products' stage in the product life cycle. This means complying with manufacturing quality regulations (such as U.S. Food and Drug Administration ("FDA") good manufacturing practice regulations in the U.S.), engaging in research and development activities in an ethical manner and applying the highest scientific standards. All data and other information regarding Company products should be accurate and not misleading.

All employees, officers and directors must raise quality or safety questions or concerns, including reports of adverse events. This duty to report adverse events arises regardless of how, where or when you learned about the information. Adverse events and product quality complaints must be reported immediately to pv@admabio.com.

Clinical Trials

Subject rights, safety and well-being are paramount. The Company is committed to complying with all laws and regulations related to the conduct of clinical trials and following the principles of the International Conference on Harmonization of Technical Requirements for Registration of Pharmaceuticals for Human Use (ICH) and the WMA Declaration of Helsinki - Ethical Principles for Medical Research Involving Human Subjects. The Company also follows the PhRMA Principles on Conduct of Clinical Trials and Communication of Clinical Trial Results (2009) and the Principles for Responsible Clinical Trial Data Sharing (2013).

Transparency of Clinical Trial Data

The Company discloses and communicates its scientific data and results in a timely and accurate manner. This includes listing clinical trial protocols, as applicable, on the www.ClinicalTrials.gov website. The Company reviews and verifies data from all study sites to ensure the accuracy and integrity of the data that is reported.

Privacy of Subject Information

The Company is committed to respecting the privacy of subjects that participate in clinical trials for its products. When legitimate activities related to the clinical trial require collecting, reviewing or using this personal information, care will be taken to prevent inappropriate use or release of this information.

Informed Consent

ADMA processes are designed to assure that all study participants (patients or their legal representatives) enrolled in any clinical trial we conduct have given their free and informed consent

to participate in the trial. Study participants must be informed about the purpose of the research so that they can understand the information and are able to make a voluntary decision about whether to enroll.

Regardless of a trial objective, it must be designed to protect the safety of participants and guarantee that they give their voluntary consent based on clear, complete information that is expressed in an understandable, non-technical style, especially for trial participants who may be vulnerable for any reason. Informed consent must be obtained prior to any procedure or change in the procedure required by the study protocol and before any data is collected.

The individual informed consent process is the cornerstone of ethical recruitment of participants in clinical trials. The study participant should be the central focus of this process, which is not just about signing forms. Our continuous improvement process looks especially at participants' age, literacy and other factors that may potentially make them vulnerable.

Risk Assessment

We have a formal risk assessment process for clinical trial site selection using a structured evaluation methodology, including identification, on-site visits, and assessment of potential operational, regulatory and financial concerns.

Internal Clinical Audits

We conduct internal audits of our trials, associated systems and contractors to protect participants' safety and ensure continuous improvement and compliance with our quality standards. Quality assurance involves the systematic and independent examination of all trial related activities and documents. This includes site audits (both routine and for cause), vendor audits and system/process audits, as well as inspections and preapproval inspections.

Ethical Treatment of Animals

Animal research raises ethical issues not only for clinical researchers that use animals as part of their studies, but also for society. The Company believes that the use of animals in research is justified only when there are evident benefits to human and animal health. As a key element of its bioethical framework, the Company is committed to meeting all applicable regulations and standards for the use of animals in its studies and to develop alternative approaches to their use whenever possible.

Any study of animals for medical research purposes on behalf of ADMA is conducted by external partners that hold formal accreditation by the American Association for Accreditation of Laboratory Animal Care (AAALAC). It is the responsibility of every employee or any other person working on behalf of ADMA at all sites studying animals to comply with the following policies:

- Research and development activities will only utilize animals when there is an expectation that the results will contribute to the preservation or improvement of human health. Scientific merit, legal and ethical rationale, as well as scientific rigor and integrity, must be established before the use of animals will be authorized.
- Before authorizing the study of animals, the Company will weigh the requirements for the use of animals against potential animal welfare concerns.
- Studies involving animals must meet the principles of the "three R's" of animal experimentation: Replacement, Reduction, and Refinement. Animals will be studied only in the absence of acceptable alternatives to obtaining an identical result (Replacement); by using the smallest number necessary for the integrity of the research and development activity (Reduction); and under conditions that optimize animal welfare and prevent animal pain or distress (Refinement).
- External partners must comply with animal welfare laws and commit to the spirit of Company policies. All external partners must obtain external accreditation of their testing facilities and provide updates to ADMA in any event of animal mistreatment as it occurs. To the best of the Company's knowledge, none of these external partners use transgenic or genetically modified animals. The Company reserves the right to audit any external partners who perform animal research services on its behalf.

Employment Practices / Equal Opportunities

The Company pursues fair employment practices in every aspect of its business. The Company strives to ensure that its employee base is diverse and consists of individuals of varying demographic characteristics and backgrounds with various and relevant career experience, relevant technical skills, education, industry knowledge and experience, experience and local or community ties. The following is only intended to be a summary of certain of the Company's employment policies and procedures. Copies of the Company's detailed policies are available upon request. Company employees and suppliers must comply with all applicable labor and employment laws, including anti-discrimination laws and laws related to freedom of association and privacy, and follow the Company's practices set forth herein. The Company does not tolerate child labor in any form. The Company will not employ any person younger than the statutory minimum age for employment according to the UN Convention on the Rights for the Child. Additionally, the Company does not accept or apply forced, compulsory or involuntary labor in any form. It is your responsibility to understand and comply with the laws, regulations and policies that are relevant to your job. Failure to comply with labor and employment laws can result in civil and criminal liability against you and the Company, as well as disciplinary action by the Company, up to and including termination of employment. You should contact the Human Resources department, or the Compliance Officer if you have any questions about the laws, regulations and policies that apply to you.

Harassment and Discrimination

The Company strives to provide a safe, orderly, diverse and inclusive work environment that is free of any harassment or discrimination. The Company is committed to providing equal opportunity and fair treatment to all individuals on the basis of merit, without discrimination because of age, ancestry, color, creed, disability (mental or physical), ethnicity, gender identity, genetic information, marital status, national origin, pregnancy, race, religion, sex, sexual orientation, veteran status, or any other factor protected by federal, state, or local law. The Company also prohibits harassment based on these characteristics in any form, whether physical or verbal and whether committed by supervisors, non-supervisory personnel or non-employees. Harassment may include, but is not limited to, offensive sexual flirtations, unwanted sexual advances or propositions, verbal abuse, sexually or racially degrading words, including slurs, patently biased statements and "code words" that are purportedly neutral on their face but which, in context, convey a sexual or racial meaning, or the display in the workplace of sexually suggestive or racially degrading objects or pictures.

To comply with applicable laws ensuring equal employment opportunities, the Company will attempt to make reasonable accommodations as required by law. Reasonable accommodation(s) may be available for religious beliefs or practices, gender identity, pregnancy and/or lactation, or disability as required by law. For further information, contact the Human Resources department.

ADMA strives to create and maintain a work environment in which people are treated with dignity, decency and respect. The environment of the Company should be characterized by mutual trust and the absence of intimidation, oppression, and exploitation. Employees should be able to work and learn in a safe, yet stimulating atmosphere. The accomplishment of this goal is essential to the mission of the Company. For that reason, ADMA will not tolerate, and strictly prohibits, unlawful discrimination or harassment of any kind. Through enforcement of this policy and by education of employees, the Company will seek to prevent, correct and discipline behavior that violates this policy.

The purpose of the policy set forth below is not to regulate the personal morality of employees, but rather to foster a work environment that is free from all forms of discrimination or harassment based on any factor protected by federal, state, or local law.

All ADMA employees, other workers, and representatives are prohibited from engaging in unlawful discrimination and/or harassment. All ADMA employees are covered by and are expected to comply with this policy and to take appropriate measures to ensure that prohibited conduct does not occur.

If you have any complaints about discrimination or harassment, report such conduct to your supervisor, the Human Resources department, or the Compliance Officer. All complaints will be treated with sensitivity and discretion. Your supervisor, the Human Resources department, the Compliance Officer and the Company will protect your confidentiality to the extent possible, consistent with law and the Company's need to investigate your concern. Where the Company's investigation uncovers harassment or discrimination, the Company will aim to take prompt corrective action, which may include disciplinary action by the Company, up to and including,

termination of employment. The Company strictly prohibits retaliation against an employee who, in good faith, files a complaint. Any member of management who has reason to believe that an employee has been the victim of harassment or discrimination or who receives a report of alleged harassment or discrimination is required to report it to the Human Resources department immediately.

Alcohol and Drugs

The Company is committed to maintaining a drug-free workplace. All Company employees must comply strictly with Company policies regarding the abuse of alcohol and the possession, sale and use of illegal drugs (for the purpose of this Code of Conduct, "illegal drugs" includes marijuana). Drinking alcoholic beverages is prohibited while on duty or on the premises of the Company, except responsibly in moderation at specified Company-sanctioned events or as otherwise authorized by management. Possessing, using, selling or offering illegal drugs and other controlled substances is prohibited under all circumstances while on duty or on the premises of the Company. Likewise, you are prohibited from reporting for work, or driving a Company vehicle or any vehicle on Company business, while under the influence of alcohol or any illegal drug or controlled substance (prescription or otherwise).

ADMA encourages employees to voluntarily seek help with alcohol and/or drug-related problems. ADMA offers all employees assistance with alcohol and/or drug-related problems through its confidential Employee Assistance Program (EAP).

Violence Prevention and Weapons

The safety and security of Company employees is vitally important. The Company will not tolerate violence or threats of violence in, or related to, the workplace. If you experience, witness or otherwise become aware of a violent or potentially violent situation that occurs on the Company's property or affects the Company's business you must immediately report the situation to your supervisor, the Environmental, Health & Safety department or the Human Resources department. The Company does not permit any individual to have firearms, weapons, explosives or other dangerous materials of any kind on Company property or in vehicles, while on the job or off-site while on Company business. This is true even if you have obtained legal permits to carry weapons. The only exception to this policy applies to security personnel who are specifically authorized by Company management to carry weapons or pursuant to another state law exception (including, but not limited to, Florida Statute §790.251, pursuant to which employees with a valid concealed carry permit may lawfully store a firearm in their locked, privately owned vehicle on Company property, provided the weapon is not visible or removed from the vehicle).

FIELD-BASED INTERACTIONS AND PATIENT ADVOCACY

Interactions with Health Care Professionals

Each covered person who interacts with health care professionals ("HCPs") regarding the Company's products, as well as any third party that interacts with HCPs on ADMA's behalf, is required to comply with all applicable laws, as well as applicable ADMA policies and procedures. All collaborations with HCPs, from research engagements to patient speaker programs to serving as an advisor or a consultant, must be transparent, properly documented and free from inappropriate influences. HCPs must only be engaged when there is a clear, legitimate business need. All fees paid to HCPs must be fair market value ("FMV") in accordance with ADMA policies and procedures. Covered persons are strictly prohibited from attempting to influence the judgment of an HCP with respect to prescribing any ADMA product, engaging in off-label marketing, or otherwise promoting products in a manner inconsistent with their FDA-approved labeling. As part of the Company's commitment to serve its immune deficient patients and other patients at risk for certain infections, the Company strives to interact only with HCPs who promote the best interests of their patients.

Business Arrangements

Each arrangement with an HCP is required to be documented in writing via a contract, and payment must be made in accordance with FMV, consistent with ADMA's policies and procedures. Payments to HCPs must never be made in cash, and must always be through Company check or wire transfer. The determination of FMV may not take into consideration the volume or value of any referrals or business involving ADMA products or services that have been, are, or might be generated by the HCP or customer. FMV includes both monetary compensation as well as an in kind (e.g., an educational item of value) item that complies with ADMA policies and procedures. Any financial arrangements, meals or items of value provided to HCPs must comply with the Pharmaceutical Research and Manufacturers of America's *Code on Interactions with Healthcare Professionals*.

ADMA decision-making policies and procedures ensure that financial support, such as grants and business arrangements, to entities such as professional organizations, patient advocacy groups and similar organizations is free of any inappropriate influences. All HCP payments, items of educational value, grants and contributions must be approved in advance through the appropriate ADMA processes and reported under the Physicians Payments Sunshine Act and in accordance with ADMA policy.

Product Promotion

Covered persons have an ethical responsibility to provide accurate, balanced and updated information about our products to HCPs and patients. The following fundamental principles guide our marketing practices and interactions with HCPs and customers:

- Product promotion must consider the needs of the Company's customers and must only be conducted after the necessary marketing authorizations have been granted and consistent with the FDA-approved product labeling.

- Product promotion must be clearly labeled, truthful, balanced, not misleading, be substantiated by supporting evidence and must accurately reflect the benefits and risks.

- Sponsorships of medical or scientific events must be clearly disclosed, and the event's purpose must have, at its core, the sharing of relevant medical or scientific information.

- Hospitality must be appropriate, modest, consistent with local business practices and secondary to the main purpose of providing relevant medical or scientific information.

- Do not provide gifts or entertainment of any kind to HCPs or their families.

- Do not make any personal incentives for the recommendation, prescribing, use, or favorable formulary or medical guideline position of Company products.

- Avoid product placements or inappropriate attribution in media where the Company's efforts are disguised as market research or non-Company created content.

- All marketing interactions, materials and activities must be clearly distinguishable as marketing communications, conform to ethical, medical and scientific standards, and comply with all applicable federal and state laws and regulations, guidance and ADMA policies. All suppliers and distributors engaged in marketing and promotional practices are expected to know, understand and comply with all applicable legal and regulatory requirements.

Commercial Staff Interactions

Covered persons (including but not limited to commercial employees and contractors representing ADMA) may not create their own promotional materials or utilize any promotional materials that have been altered or changed in any way without approval by ADMA's Promotional Review

Committee (the "PRC"). Additionally, the use of expired, lapsed or recalled materials is not permitted under any circumstances.

Under no circumstances may covered persons solicit requests for or answer an unsolicited request for off-label information. In such circumstances, they must utilize the Medical Information Request Form (MIRF) in the customer relationship management (CRM) system and submit the form electronically or via email to MA@admabio.com. In addition, it is encouraged to report side effects of prescription drugs to ADMA Biologics at 1-800-458-4244 or the FDA. Visit www.fda.gov/MedWatch or call 1-800-FDA-1088.

Covered persons may never provide, promise, imply, suggest or offer any payment, educational item, service or any other item of value to an HCP or customer in exchange for a referral, use, recommendation or favorable formulary or clinical treatment guideline position of an ADMA product including, but not limited to:

- Gift cards.
- Promise of engagement as a speaker or consultant.
- Pull patient charts potentially appropriate for an ADMA product.
- Complete paperwork for prior authorization or other reimbursement.
- Meals in exchange for a commitment to use or recommend an ADMA product.

Covered persons may only call on HCPs who treat patients who are reasonably expected to use ADMA products for their FDA-approved indication.

Covered persons must utilize the CRM system in order to properly document their interactions with HCPs in a timely manner (within 48 hours of the interaction). All information input must be truthful, accurate and timely.

Covered persons may not use email, text, instant messaging or any other forms of electronic communication to distribute or discuss ADMA promotional materials unless the communication method and the promotional materials have been approved as such by the PRC.

Covered persons may not engage in any discussions with HCPs regarding the provision of grants (e.g., sponsorships, Continuing Medical Education ("CME"), non-CME, Investigator Initiated Studies (IIS)), medical grants or charitable contributions). All such requests must be directed to the Medical Affairs Department.

During promotional interactions with HCPs or other customers at medical conferences, Congresses or other professional meetings, commercial covered persons must stay within the area designated

for promotional activities and may not staff Medical Information booths unless otherwise authorized.

ADMA provides training to all covered persons who require an understanding of the policies, as well as to third parties interacting with HCPs and healthcare organizations on ADMA's behalf.

Covered persons assigned to staff medical booths may not switch over to a promotional booth at the same conference.

Covered persons may not promise, imply or suggest that they will provide funding for grants, charitable contributions or other forms of funding to or on behalf of an HCP or customer. All such requests must direct the HCP or customer to contact ADMA's Medical Affairs Department at ma@admabio.com or 800-458-4244.

Patient Advocacy, Support and Programming

Since ADMA's inception, supporting immune compromised patients and their communities is a top corporate priority. ADMA is an advocate of fairly and appropriately supporting both patients and patient organizations. ADMA recognizes the importance of patient organizations in raising awareness and providing education, which influences its work in creating transformative products. In addition to developing products for the prevention and treatment of infectious diseases that affect these patients, ADMA is a proud supporter of both the Jeffrey Modell Foundation ("JMF") and the Immune Deficiency Foundation ("IDF"). JMF is a global nonprofit dedicated to early diagnosis, treatments, and ultimately, future cures for Primary Immunodeficiency through awareness, advocacy, and research. IDF is a nonprofit committed to improving the diagnosis, treatment, and quality of life of people affected by Primary Immunodeficiency through fostering a community empowered by advocacy, education, and research. ADMA strives to build a culture

of trust with patients and the patient organizations it works with, which is critical in furthering ADMA's knowledge of patient experiences.

When the Company works directly with patients and patient organizations, it:

- Obtains a voluntary and informed consent when warranted or required
- Strives to better understand their experiences, considering the patient and caregiver's point of view
- Respects the right of patients and patient organizations to make independent decisions
- Is transparent regarding financial and non-financial support for patient organizations
- Directs requests from patient organizations or patients to its Medical Affairs Department

When ADMA works directly with patients and patient organizations, it does NOT:

- Interfere with patients' relationships with their physicians or caregivers
- Violate patient privacy
- Inappropriately influence a patient organization to endorse ADMA products
- Control patient organization materials or other publications
- Contact patients proactively

Social Media Interactions

ADMA understands the importance and power of social media in everyday life and the Company's business. Social media is one way our audiences communicate and how they learn about the Company's therapies. ADMA strives to use social media in a thoughtful and appropriate manner. ADMA has guidelines that determine the channels, communication methods and requirements that must be followed to avoid the risks associated with social media. In accordance with ADMA's guidelines, only individuals authorized to communicate through social media on behalf of ADMA

may do so. Therefore, when using social media in a personal capacity, covered persons must make it clear that their actions represent themselves and not ADMA.

In order to protect our brands on social media, covered persons should:

- Ensure they are not communicating on behalf of ADMA on social media unless authorized to do so
- Understand the risks associated with social media
- Practice good manners, treating others with politeness and courtesy
- Exercise caution in ADMA's social media actions, by stopping and thinking before responding
- Respect the intellectual property and copyright of others
- Respect the privacy of our employees and patients
- Follow the terms of use of the applicable social media channel

In order to protect ADMA's brands on social media, covered persons should NOT:

- Engage in social media actions that involve false, misleading or unsubstantiated information
- Comment about ADMA's competitors or their products
- Disclose confidential or proprietary information
- Discriminate against or harass anyone
- Take a social media action that is illegal, threatening, sexually explicit or abusive
- Provide advice on products, medical diagnoses or clinical trials
- Cite, reference, include or mention third parties, business partners or customers without their approval

CONDUCT REGARDING OUTSIDE ACTIVITIES

Responsible Citizenship

ADMA strives to be a responsible corporate citizen committed to improving the communities in which it operates. ADMA actively supports initiatives designed to improve the communities in which its employees reside. ADMA encourages covered persons to take part in community and industry-mission activities. For example, ADMA annually sponsors and participates in industry-related charitable events and encourages its employees to actively participate and volunteer. Covered persons are to act only on behalf of themselves and not as representatives of the Company unless authorized to do so by the Compliance Officer.

Political Activities

Personal participation in political activities is separate from corporate activities. While the Company encourages individual participation in the political process, no covered person should create the impression of speaking or acting on the Company's behalf without specific authorization. The Company's name, trademarks and other property (e.g., stationery, business cards, email etc.) and work time are not to be used in connection with such activities. Additionally, political campaigning on Company property is prohibited.

USE AND PROTECTION OF COMPANY ASSETS

All covered persons are responsible for the protection and appropriate use of ADMA assets consistent with all Company policies. Company property may ***only*** be used for legitimate business purposes. Company property includes all electronic communications and computer information systems, such as computers, internet, printers, email, and phone or mobile phone systems. For further information, refer to the Company's *Electronic Communications Policy*. Company property specifically includes all confidential information as defined in the Company's *Confidentiality, Intellectual Property, and Inventions Policy*. Company property also includes corporate funds, facilities, equipment, inventory, office supplies, and all proprietary information about the Company's business or its employees. Theft, carelessness, misuse, or loss of Company property may result in disciplinary action and/or legal prosecution.

WAIVERS

Covered persons must follow this Code of Conduct at all times. In rare circumstances, conflicts may arise that necessitate waivers of the policies and guidelines outlined in this Code of Conduct. Any request for a waiver of a policy or guideline in this Code of Conduct by a covered person must be submitted in writing or electronically to the Compliance Officer. The Compliance Officer will regularly report to the Board or its designated committee any waivers that have been granted

to covered persons. Waivers for covered persons (other than executive officers and directors) will be determined on a case-by-case basis by the Chief Executive Officer, with the advice of the Compliance Officer as appropriate.

Waivers for executive officers and directors of the Company, as well as for the Compliance Officer, must be determined by the Board. The Board has absolute discretionary authority to approve or deny waivers of policies or guidelines in this Code of Conduct with respect to any executive officer or director, or the Compliance Officer. Waivers granted to executive officers or directors, and other applicable covered persons, must be publicly disclosed in accordance with the requirements of the Nasdaq Stock Market LLC and the SEC.

ADMINISTRATION OF THIS CODE OF CONDUCT

All of the Company's directors, officers, and employees, and certain advisors, consultants and agents, will receive a copy of this Code of Conduct, as well as any updates to this Code of Conduct.

Supervisors and officers have important roles under this Code of Conduct and are expected to demonstrate their commitment to this Code of Conduct by modeling compliance and fostering a workplace environment that promotes compliance with this Code of Conduct.

The Compliance Officer will report to the Board or its designated committee regarding any issues arising in connection with this Code of Conduct.

REPORTING AND INVESTIGATION OF SUSPECTED VIOLATIONS

It is the responsibility of each covered person to report suspected violations of law, this Code of Conduct, and other ADMA policies through the appropriate reporting mechanism, as set forth below:

- For general legal, policy or other Code of Conduct concerns, please contact the Compliance Officer;

- For non-accounting/auditing whistleblower reports (as described in the Company's *Whistleblower Policy* (Appendix F)), or other employment or Human Resources related concerns, please contact Human Resources; and

- For accounting, auditing or internal controls-related whistleblower reports (as described in the Company's *Whistleblower Policy* (Appendix F)), please contact the Chairperson of the Audit Committee as further described in Appendix F.

Notwithstanding any provision of this Code of Conduct, the Employee Handbook, or any other Company policy or agreement to the contrary, nothing herein is intended to prohibit, restrict, or

discourage any covered person from: (i) reporting possible violations of federal or state law or regulation to any governmental agency or entity, including but not limited to the U.S. Securities and Exchange Commission, the U.S. Department of Justice, the U.S. Commodity Futures Trading Commission, the U.S. Congress, or any agency Inspector General, or making other disclosures protected under the whistleblower provisions of federal or state law or regulation; (ii) cooperating with any such governmental agency or entity in connection with any investigation or proceeding; or (iii) making disclosures that are protected under the anti-retaliation provisions of federal or state law or regulation. A covered person is not required to notify or obtain prior authorization from the Company before engaging in any such activity. Furthermore, in accordance with 18 U.S.C. § 1833(b), a covered person shall not be held criminally or civilly liable under any federal or state trade secret law for the disclosure of a trade secret that is made (A) in confidence to a federal, state, or local government official, either directly or indirectly, or to an attorney, solely for the purpose of reporting or investigating a suspected violation of law, or (B) in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal.

If you have questions regarding this Code of Conduct or require advice about a particular situation, please seek guidance from the Compliance Officer.

The Company has appointed Michael A. Goldstein, Esq., Executive Director, General Counsel, as the Compliance Officer. His contact information is:

Michael A. Goldstein, Esq.
Corporate Compliance Officer
ADMA Biologics, Inc.
5800 Park of Commerce Blvd., NW
Boca Raton, Florida 33487

The Compliance Officer shall ensure the appropriate handling and/or investigation of suspected violations of this Code of Conduct. All reported violations will be promptly investigated and treated confidentially to the extent reasonably possible. All covered persons must cooperate with Company investigations. Once a covered person reports a suspected violation, that individual should maintain confidentiality regarding the reported violation, avoid discussing it with other employees or covered persons, and allow ADMA to conduct an appropriate investigation.

It is a violation of this Code of Conduct and Company policy to retaliate against anyone for reporting, in good faith, a suspected violation of law or Company policy. However, individuals may be subject to disciplinary action for making bad faith reports under this Code of Conduct.

APPENDIX C: FOREIGN CORRUPT PRACTICES ACT AND USA PATRIOT ACT POLICY

ADMA Biologics, Inc. ("ADMA" or the "Company") is committed to a high standard of business ethics and integrity worldwide. ADMA is committed to complying with applicable law wherever it operates and not intruding into the political affairs of any country. ADMA's foreign consultants, agents, and joint venture partners must demonstrate an ability and willingness to abide by the Company's policies and ethical standards.

The purpose of this policy is to ensure compliance by the Company with the Foreign Corrupt Practices Act of 1977, as amended (the "FCPA"), and the USA PATRIOT Act, as amended (the "Patriot Act"). This policy should be read in conjunction with the Company's Code of Ethics and Business Conduct and other policies.

This policy extends to all of the Company's domestic and foreign operations, including any departments, subsidiaries, agents, consultants, other representatives, joint ventures, or other business enterprise outside the United States. This policy also extends to all of the Company's financial record-keeping activities and obligations pursuant to federal and state securities laws in the United States.

Company employees who conduct international business should be aware that they may come into contact with foreign officials. In some countries, officials may request improper payments related to Company operations. Consequently, employees must carefully comply with this policy in their interactions with foreign officials.

FOREIGN CORRUPT PRACTICES ACT POLICY

The FCPA prohibits U.S. citizens and companies from bribing foreign officials. This prohibition extends to Company officers, directors, employees, agents, and stockholders acting on their behalf. The FCPA also requires U.S. companies to keep accurate and complete books and records and to adequately maintain internal accounting controls.

Prohibited Payments

Company employees shall not bribe foreign officials in order to obtain or retain business or to secure any improper advantage. Specifically, employees are prohibited from making payments, offering payment, or providing money or anything of value to a foreign official.

"Foreign official" means any officer or employee of: (1) a foreign government (i.e., outside the United States); (2) any department, agency, or instrumentality of a foreign government (including

government-owned or government-controlled state enterprise); (3) a public international organization[1]; (4) any person acting in an official capacity for or on behalf of a foreign government, government entity, or public international organization; (5) any foreign political party or party official; or (6) any candidate for foreign political office. This definition extends to elected and appointed officials, as well as many others, including consultants who hold government positions, employees of companies owned by foreign governments, and political party officials.

Company employees cannot make direct or indirect payments to foreign officials. The Company can face FCPA liability for improper payments made by its employees, agents, or other business partners. Accordingly, the Company prohibits all of its employees, agents, or business partners from promising or making any gift, payment, or offer of anything of value to a foreign official (either directly or indirectly).

All employees should contact the Company's Compliance Officer with any questions about this policy.

Permissible Payments

Company employees or agents must contact the Compliance Officer and obtain written approval prior to making any payment described herein. In addition, all expenses must be fully and accurately described in the Company's books and records.

A payment may also be made if it is lawful under the written laws and regulations of the foreign country.

"Promotional or marketing payments" may also be permitted. For example, certain reasonable, bona fide expenses incurred while promoting the Company to foreign officials, hosting a tour of foreign public officials at a Company facility, or entertaining employees of a foreign state-owned firm may be permitted.

Contributions and Donations

Donations to bona fide charitable organizations may be permitted as long as the donation will not be used to circumvent the FCPA and the contribution is permitted by written law.

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[1] "Public international organization" means certain designated organizations, including the World Bank, the International Finance Corporation, the International Monetary Fund, and the Inter-American Development Bank.

Prior, written approval from the Compliance Officer is required for any contribution or donation.

Record-Keeping, Accounting, and Payment

It is crucial to keep detailed, accurate descriptions of all Company payments and expenses. The Company must keep books, records, and accounts that are reasonably detailed, accurate, and fairly reflect all transactions and dispositions of assets. The FCPA prohibits the mischaracterization or omission of transactions in the Company's records, as well as the failure to maintain proper accounting controls which result in such a mischaracterization or omission.

Accordingly, Company employees must follow applicable standards and Company practices for accounting and financial reporting. Employees must prepare timely, accurate, and complete reports and records required by the Company. Employees must obtain required approvals from the Compliance Officer and, when appropriate, from foreign governmental entities. Prior to making any payment to a foreign official, Company employees and agents should ensure that the entire payment is for the purpose intended and that it is fully and accurately described in the Company's records. All payments and transactions must be truthfully disclosed and recorded in Company records. Company employees or agents may not use personal funds for Company business or any of the purposes prohibited in this policy.

Selection of Business Partners

The Company will compete for all business opportunities vigorously, fairly, ethically, and lawfully. The Company will conduct business using only legal and ethical means. The Company requires the same of its agents, consultants, representatives, and business partners. The Company will carefully select business partners to avoid FCPA violations. Prior to entering into an agreement with any agent, consultant, joint venture, business partner, or other representative for international business operations, the Company will perform thorough FCPA-related due diligence and obtain assurances of compliance by the third party.

Penalties

FCPA violations can result in significant penalties and criminal liability for both individuals and corporations.

Individuals who violate the anti-bribery provisions of the FCPA may face criminal penalties including significant fines and/or imprisonment. ***The Company is not and will not be responsible for any liability or fine imposed on an individual.***

Corporations that violate the FCPA may face criminal penalties, including significant fines . In addition, FCPA violations can result in civil penalties against a company and/or any officer, director, employee, agent, or a stockholder acting on behalf of a company who violates the FCPA.

Individuals who willfully violate the accounting provisions of the FCPA may face significant fines and/or imprisonment. A corporation may be significantly fined for willfully violating FCPA accounting provisions. Both individuals and corporations violating the FCPA's accounting provisions can be subject to significant fines.

In addition to civil and criminal penalties, individuals or corporations that violate the FCPA may be precluded from doing business with the U.S. government, denied export licenses, and/or debarred from programs under the Commodity Futures Trading Commission and the Overseas Private Investment Corporation.

In addition to the potential for liability imposed by the government, violations of this policy will result in discipline up to and including termination of employment from the Company.

USA PATRIOT ACT POLICY

In compliance with the Patriot Act, the Company is committed to ensuring that its operations do not contribute to money laundering or terrorist financing.

To ensure that the Company's business transactions with foreign entities do not facilitate money laundering or other prohibited activity, the Company will conduct due diligence into the identity and reputation of each organization or individual with which it has business transactions, including the identity of the organization's principals, the nature of the organization's business, and its ties to other entities.

If you believe you have detected any suspicious activities, including anything potentially involving money laundering or terrorist financing, you should immediately report the activity to the Compliance Officer. In addition, you should report to the Compliance Officer any transaction in which cash of $10,000 or more is utilized. The Compliance Officer will then conduct an investigation, if appropriate, and determine whether to report these activities to the government or take other action.

Every Company employee, foreign consultant, agent, representative or joint venture partner whose duties are likely to lead to involvement in or exposure to any of the areas covered by the FCPA and the Patriot Act is expected to become familiar with and comply with this policy. Periodic certifications of compliance with the Company's policy will be required, as will participation in training sessions as instructed by management. If you have questions or problems concerning this policy, foreign officials or payment practices you should contact the Compliance Officer.

APPENDIX D: INSIDER TRADING POLICY

ADMA Biologics, Inc. (the "Company") has adopted the policies and procedures described herein in order to prevent insider trading. The Company prohibits trading based on Company Material Nonpublic Information (as defined in this policy) regarding the Company or gained during the course of work for the Company. The policy covers the Company itself and its subsidiaries and all officers, directors, members of the scientific advisory board, employees, consultants, advisors and independent contractors of the Company (including all Company affiliates or subsidiaries) (collectively, "Covered Persons"), who may have access to Company Material Nonpublic Information. The Company has determined that "Access Persons" (as defined in this policy) are subject to the pre-clearance requirement described below because the Company believes those Access Persons have, or are likely to have, access to Company Material Nonpublic Information on a more frequent basis than other Covered Persons. The current list of Access Persons is maintained by the Insider Trading Compliance Officer, and such persons have been separately notified. This list of Access Persons is subject to change at the Insider Trading Compliance Officer's discretion, and it will be updated periodically. Under special circumstances, certain persons not defined as an Access Person under this policy may come to have access to Company Material Nonpublic Information. During any period that a person is in possession of Company Material Nonpublic Information, that person will be deemed an Access Person and will be subject to the pre-clearance procedure described in this policy.

Applicability

This policy applies to all transactions in the Company's securities, including common stock, options for stock, preferred stock, warrants, convertible debentures, and other derivative securities relating to the Company's stock (such as exchange-traded options), whether or not issued by the Company. This policy applies to all Covered Persons. This policy also applies to Family Members of Covered Persons. "Family Member" includes any spouse, partner, child, grandchild, parent, sibling, grandparent, family-in-law, step-family, guardian or caretaker, aunt, uncle, niece, nephew, cousin, any person living in the same household, and/or the spouse or partner of the foregoing individuals. For the avoidance of doubt, the definition of "Family Member" includes adoptive relationships. Covered Persons are responsible for compliance by their Family Members.

This policy continues to apply to Covered Persons' transactions in Company securities or the stock of other public companies engaged in business transactions with the Company even after their tenure with the Company has terminated. If a Covered Person is in possession of Company Material Nonpublic Information when their relationship with the Company concludes, the Covered Person and their Family Members may not trade in Company securities or the stock of such other company until the information has been publicly disseminated.

Violations of this policy can result in civil and criminal penalties, as well as discipline, or termination of employment or business relationship with the Company.

Material Nonpublic Information

Information is "Material Nonpublic Information" if: (1) there is a substantial likelihood that the information would be considered important to an investor making an investment decision regarding the transaction of securities ("material information"), and (2) it has not been previously disclosed to the general public and is otherwise not available to the general public ("nonpublic information"). Material Nonpublic Information involving the Company is deemed to be "Company Material Nonpublic Information". Material Nonpublic Information involving other companies is deemed to be "Other Company Material Nonpublic Information." Information generally would be considered widely disseminated to the general public if it has been disclosed through the newswire services, a broadcast on widely-available radio or television programs, publication in a widely-available newspaper, magazine or news website, or public disclosure documents filed with the SEC that are available on the SEC's website. By contrast, information would likely not be considered widely disseminated if it is available only to the Company's employees, or if it is only available to a select group of analysts, brokers and institutional investors.

The below categories of Company information (either positive or negative) are particularly sensitive and should be considered Company Material Nonpublic Information:

- Financial results
- Sales of Company products
- Company products demand from distributors and end users
- Projections of future earnings or losses
- News of a pending or proposed merger or acquisition
- A Company restructuring
- News of the disposition of a subsidiary
- Major marketing changes
- A significant cybersecurity incident, such as a data breach, or any other significant disruption in the Company's information technology infrastructure
- Significant related party transactions

- Impending bankruptcy or financial liquidity problems
- Gain or loss of a substantial customer or supplier
- Procurement or loss of significant contracts
- Status of significant projects/initiatives
- Changes in dividend policy
- New product announcements of a significant nature
- Results of any clinical trials
- Significant product defects or modifications
- Significant operations-related information
- Significant pricing changes
- Stock splits
- New equity or debt offerings
- Potential for significant litigation exposure
- Changes in senior management
- The establishment of, or any significant developments or changes regarding, a repurchase program for Company securities, including the Company's stock repurchase plan for its common stock (such as planned repurchases, increases or decreases in the program's authorization, suspensions and similar changes)
- The imposition of an event-specific restriction on trading in Company securities or the securities of another company or the extension or termination of such restriction

Applicability to Material Nonpublic Information Regarding Other Companies

This policy and the guidelines described herein also apply to Other Company Material Nonpublic Information relating to other companies, including the Company's collaborative partners, customers, vendors, or suppliers (collectively, "business partners"), potential acquisition targets or acquirors, or competitors, when the Other Company Material Nonpublic Information is obtained in the course of employment or services performed for the Company, or otherwise obtained.

Covered Persons must not engage in transactions of securities for the Company's business partners, potential acquisition targets or acquirors, or competitors while in possession of their Other Company Material Nonpublic Information. Moreover, Covered Persons must not engage in transactions of securities for any closely correlated or economically-linked business partners or competitors while in possession of Company Material Nonpublic Information (i.e., "shadow trading").

Designations for Covered Persons

The Company has determined that those persons identified on Exhibit 1 ("Section 16 Individuals") are subject to the reporting and penalty provisions of Section 16 of the Securities Exchange Act of 1934, as amended ("Section 16"). The Company has determined that Section 16 Individuals are subject to the pre-clearance requirement described below because they are likely to have access to Company Material Nonpublic Information.

The Company has also determined that Access Persons who are not Section 16 Individuals are subject to the pre-clearance requirement described below because they are likely to have access to Company Material Nonpublic Information. The Insider Trading Compliance Officer may designate additional Access Persons, as necessary from time to time. During any period of time where someone not previously identified as an Access Person has access to Company Material Nonpublic Information, that person shall become an Access Person subject to additional provisions of this policy.

Considerations Related to Insider Trading

The Company prohibits the unauthorized disclosure of confidential information acquired while performing services for the Company and the misuse of Company Material Nonpublic Information in securities trading. Specific restrictions on securities trading are outlined below.

A. **Prohibitions on Trading**. Covered Persons are prohibited from entering into any trade immediately after the Company has made a public announcement of material information, including earnings releases. Covered Persons must not engage in any transaction involving a purchase or sale of the Company's securities from the date that they possess Company Material Nonpublic Information, until either (1) the passage of two full Trading Days following the public disclosure of that information, or (2) such time as that nonpublic information is no longer material. For example, if a public announcement is made on a Monday afternoon, Covered Persons may not make trades of Company securities until Thursday. "Trading Day" means a day on which national stock exchanges are open for trading, and a "full" Trading Day includes from market open to market close.

B. **Disclosure of Information to Others**. The Company is required to avoid the selective disclosure of Company Material Nonpublic Information. The Company has established procedures for releasing material information in a manner designed to achieve broad public dissemination of the information immediately upon its release. Covered Persons may not disclose material information to anyone outside the Company, including Family Members, relatives, friends, or acquaintances, other than in accordance with these procedures. Covered Persons may not disclose or discuss the Company's confidential information or material information in any public forum, including internet blogs, posts, or other web forums, unless that Covered Person is authorized as a Company spokesperson in accordance with these procedures.

C. **Confidentiality of Nonpublic Information**. The nondisclosure obligations under this policy are in addition to any confidentially obligations Covered Persons have to the Company. Nonpublic information relating to the Company is the property of the Company and the unauthorized disclosure of such information is strictly prohibited.

D. **Appearance of Impropriety**. Covered Persons must also avoid transactions that may appear to be improper.

E. **Twenty-Twenty Hindsight**. If securities transactions become subject to scrutiny, they will be viewed after-the-fact with the benefit of hindsight. As a result, before engaging in any transaction, Covered Persons should carefully consider how regulators and others might perceive their transactions after-the-fact.

Trading Restrictions

A. **Prohibition on Trading During Blackout Periods**. The Company prohibits Covered Persons from buying or selling the Company's securities during the quarterly blackout period unless they have established a pre-arranged trading plan that complies with Rule 10b5-1 ("Rule 10b5-1") promulgated under the Securities Exchange Act of 1934, as amended (the "Exchange Act"). **Each blackout period begins on the 20th day of the last month of the fiscal quarter and continues until two full Trading Days have passed after the public release of quarterly results (or annual results in the case of the fourth quarter)**.

In addition, the Insider Trading Compliance Officer may designate additional blackout periods when Covered Persons may not purchase or sell Company securities. If the Insider Trading Compliance Officer declares a blackout period under this section of the policy, the Company will notify those Covered Persons to whom the blackout period applies when the blackout period begins and ends. The existence of an extended blackout period or event-

specific blackout period is highly confidential and must not be disclosed by a Covered Person to any other person.

Trading on dates that are outside of blackout periods will not protect anyone with Company Material Nonpublic Information from liability. Although the Company may, from time to time, recommend that certain individuals stop trading in Company securities, each Covered Person is individually responsible at all times for compliance with the prohibitions against insider trading. Trading in the Company's securities during periods that are outside of any blackout period should not be considered a "safe harbor" and all Covered Persons must use good judgment at all times.

B. **Pre-clearance of Trades**. Access Persons may not purchase, sell, or otherwise transact securities of the Company without obtaining prior clearance of the transaction via e-mail by the Insider Trading Compliance Officer. Access Persons are required to complete the Notice of Trading in Company Securities form to the Insider Trading Compliance Officer's satisfaction, and may not trade absent such e-mail approval. The Insider Trading Compliance Officer will review the proposed transaction for compliance with regulatory requirements and may take into account various factors in determining whether to grant a request for pre-clearance, including consideration of the Company's stock repurchase plan. The Insider Trading Compliance Officer may not trade Company securities without completing the Notice of Trading in Company Securities form and receiving approval from the Chief Executive Officer. The Insider Trading Compliance Officer may, at any time in their discretion, prohibit Covered Persons from trading in the Company's securities.

The Company may also find it necessary, from time to time, to require that certain Covered Persons who are not Access Persons comply with the pre-clearance process. At those times, those Covered Persons will be designated as Access Persons and notified when they begin being designated an Access Person as well as when they cease being designated as an Access Person.

C. **Additional Requirements**. The Company has established the following additional policies for Covered Persons trading Company securities:

- Any Company stock purchased in the open market by a Covered Person must be held for a minimum of six months. For the avoidance of doubt, the following would not constitute stock purchased in the open market: (a) stock acquired upon the exercise of stock options, (b) stock acquired upon the settlement of restricted stock units (RSUs) and (c) stock acquired under an employee stock purchase plan.

- Covered Persons may not engage in short sales. "Short sales" of Company stock include borrowing Company stock, selling it, and then buying (or intending to buy) the stock again at a lower price to replace the borrowed shares within a short period of time following the initial sale of the borrowed shares.
- Covered Persons may not purchase Company stock on margin. However, subject to other provisions below, Covered Persons may establish loan accounts secured by Company stock.
- Covered Persons may not buy or sell puts or calls for Company stock. "Puts" are options or rights to sell a specific stock at a specific price prior to a set date. "Calls" are options or rights to buy a specific stock at a specific price prior to a set date. These transactions appear improper because they suggest that the Covered Person believes the price of Company stock will rise or fall.

- The Company seeks to have the long-term financial interests of its officers, directors, and employees fully aligned with the interests of our other stockholders. For this reason, Covered Persons are prohibited from purchasing financial instruments (including prepaid variable forward contracts, equity swaps, collars, and exchange funds), or otherwise engaging in transactions that hedge, offset, or are designed to hedge or offset, any decrease in the market value or the full ownership risks and rewards of their direct or indirect holdings in Company securities.

- The Board recognizes that pledging by executive officers and directors of the Company's stock as collateral for indebtedness creates the risk of an unplanned sale that may occur at a time when the director or executive officer is aware of Company Material Nonpublic Information or is otherwise not permitted to trade in the Company's securities. Section 16 Individuals may not, directly or indirectly, pledge, hypothecate, or otherwise encumber shares of the Company's stock as collateral for indebtedness. This prohibition includes, but is not limited to, holding such securities in a margin account or any other account that could cause the Company's securities to be subject to a margin call or otherwise be available as collateral for a margin loan. The foregoing prohibition applies to the Company's securities that (i) an executive officer or director owns directly or indirectly or (ii) are granted by the Company as part of an executive officer's or director's compensation. Notwithstanding anything in the foregoing to the contrary, an exception to the prohibition against pledging may be granted where an executive officer or director wishes to pledge the Company's securities as collateral for a loan (not including margin debt) and clearly demonstrates the financial capacity to repay the loan without resort to the pledged securities. Any executive officer or director who wishes to pledge Company securities as collateral for a loan must submit a request for approval in writing at least one (1) week prior to the

proposed execution of documents evidencing the proposed pledge to the Compliance Officer. For the avoidance of doubt, the foregoing prohibition on pledging securities shall not apply to pledges in existence prior to September 2025.

D. **Rule 10b5-1 Trading Programs**. The Board may approve stock repurchase programs for Company securities at its discretion, including through open market transactions, privately negotiated transactions or the use of plans designed to comply with Rule 10b5-1 and 10b-18 of the Exchange Act. However, the Company shall not, directly or indirectly, buy Company securities while being aware of Company Material Nonpublic Information, other than pursuant to a Rule 10b5-1 Trading Program or as otherwise provided for herein. Per Rule 10b5-1, an individual who buys or sells securities while aware of Company Material Nonpublic Information does not violate Rule 10b5-1 if buying or selling in conformity with a binding contract, instruction, or written plan that was put into place at a time when the individual was not aware of Company Material Nonpublic Information (also known as a "Rule 10b5-1 Trading Program"). This type of pre-arranged trading plan provides an opportunity to limit potential insider trading liability.

The Company permits only those Access Persons listed in Exhibit 1 and members of senior management determined by the Insider Trading Compliance Officer (collectively, "Eligible 10b5-1 Participants") to set up Rule 10b5-1 Trading Programs. However, these Rule 10b5-1 Trading Programs must be utilized carefully for the following reasons:

- In order to comply with Rule 10b5-1, binding contracts, instructions, and written plans must: (i) lock in the amount, price, and dates of future trades; (ii) provide a formula or algorithm for determining future trades; or (iii) delegate discretion for determining amount, price and dates to a third party as provided under the rule.
- It is risky to modify or terminate these arrangements.
- Rule 10b5-1 does not eliminate other requirements and prohibitions under securities laws and transactions must also comply with, for example, reporting and short-swing profit rules under Section 16, limitations on insider selling imposed by Rule 144 promulgated under the Securities Act of 1933, as amended ("Rule 144"), prohibitions on trading during administrative blackouts under pension plans, and any other requirements.
- The liability avoidance provisions of Rule 10b5-1 are affirmative defenses in litigation, which means that the individual is required to prove that any trades were pursuant to a contract, instruction, or written plan compliant with Rule 10b5-1.
- Compliance must be well-documented, keeping in mind the possibility of defending a legal action.

E. **Establishing Rule 10b5-1 Trading Programs**. Eligible 10b5-1 Participants who wish to establish a Rule 10b5-1 Trading Program must ensure that:

- the arrangement is a written contract;
- the contract was reviewed and pre-approved by the Company's Insider Trading Compliance Officer (or, if the Eligible 10b5-1 Participant is the Insider Trading Compliance Officer, the Board) prior to finalization;
- the contract is entered into when the Eligible 10b5-1 Participant is not in possession of any Company Material Nonpublic Information and not subject to any blackout period;
- the Eligible 10b5-1 Participant does not cancel or make any changes to the contract while in possession of any Company Material Nonpublic Information or during any blackout period. All cancellations or amendments require advance, written approval by the Company's Insider Trading Compliance Officer (or, if the Eligible 10b5-1 Participant is the Insider Trading Compliance Officer, the Board); and
- the contract does one of the following:
    - specifies the amount of securities to be purchased or sold (*i.e.*, a set number of shares or a set dollar amount), including the price and date on which the securities are to be purchased or sold;
    - includes a written formula or algorithm for determining the amount of securities to be purchased or sold, and includes the price and date of their purchase or sale; or
    - delegates all power to a third party who does not have access to any Company Material Nonpublic Information, and who will determine how, when, or whether to effectuate purchases or sales.

Individuals considering such an arrangement should be aware that the Company may be required to publicly disclose the arrangement, and the details of any transactions made pursuant to this Rule 10b5-1 Trading Program may be public. Additionally, the Company will establish a procedure with the entity handling the transactions to ensure the prompt filing of a Form 4 after each transaction and compliance with Rule 144 at the time of any sale, as applicable.

Many sophisticated brokers, investment bankers, and advisors have developed protocols for Rule 10b5-1 trading plans. We strongly recommend that Eligible 10b5-1 Participants work with an experienced advisor on these matters.

In order to ensure compliance with Rule 10b5-1 and applicable securities laws, Eligible 10b5-1 Participants are required to notify the Company's Insider Trading Compliance Officer via e-mail of any planned adoption, termination or amendment of a 10b5-1

Trading Program, and also submit any 10b5-1 Trading Program subject to potential adoption, termination or amendment for the Company's Insider Trading Compliance Officer's review and approval, no later than five (5) Trading Days prior to the anticipated date of adoption, termination or amendment.

F. **Trading Restrictions During Administrative Blackout Periods**. Access Persons are prohibited, directly or indirectly, from acquiring or transferring Company equity securities acquired in connection with their service or employment during any "pension plan blackout period," except as otherwise permitted by Regulation BTR. A pension plan blackout period generally means a period of more than three consecutive business days during which at least 50% of the relevant U.S. participants or beneficiaries under the Company's applicable individual account plans are temporarily unable to transact in Company equity securities held through those plans. Transactions pursuant to a Rule 10b5-1 plan may be exempt if the applicable requirements of Regulation BTR are satisfied. The Company will provide notice of any pension plan blackout period as required by applicable law.

The Company's Insider Trading Compliance Officer will advise Access Persons of any administrative blackout periods.

Note that any profits gained from a prohibited transaction are recoverable by the Company without regard to the intent of the person who entered into the prohibited transaction.

G. **Individual Responsibility**. Every Covered Person has an individual responsibility to comply with this policy. A Covered Person may, from time to time, have to forego a planned or proposed transaction in the Company's securities. ***There are no exceptions to this policy***.

Exercise of Stock Options

The following transactions are not covered by this policy: (1) the exercise of stock options for cash under the Company's stock option plans, (2) the purchase of shares under any Company employee stock purchase plan (but not the sale of any such shares) and (3) the automatic exercise of expiring in-the-money stock options under the Company's stock option plans pursuant to the Company's brokerage platform. Individuals may perform these transactions at any time, unless the Company specifically instructs you otherwise.

Gifts and Donations

Bona fide gifts are not transactions subject to this policy, unless the person making the gift has reason to believe that the recipient intends to sell Company securities while the officer, employee or director is aware of Company Material Nonpublic Information, or the person making the gift is subject to the trading restrictions and the sales by the recipient of the Company Securities occur during a blackout period. Whether a gift is truly bona fide will depend on the circumstances surrounding each gift. The more unrelated the donee is to the donor, the more likely the gift would be considered "bona fide." For example, gifts to charities, churches and service organizations would clearly not be a trading transaction. On the other hand, gifts to dependent children followed by a sale of the "gift" securities in close proximity to the time of the gift may imply some economic benefit to the donor and, therefore, make the gift non bona fide. In addition, please note that a gift transaction by Section 16 Individuals is required to be reported on a Form 4 within two (2) business days of such transaction, therefore it is important that executive officers and directors inform the Insider Trading Compliance Officer immediately of any pending gift transactions.

Prediction Market Trading

While trading in prediction markets, event contracts, or similar instruments on events relating to the Company or the plasma-derived products industry may not constitute insider trading under the federal securities laws, such conduct may be illegal under other federal or state laws and is prohibited under the Company's Code of Ethics and Business Conduct.

Additional Information for Directors and Officers

Section 16 Individuals must also comply with the reporting obligations and limitations on short-swing transactions. Section 16 Individuals who purchase and sell the Company's securities within a six-month period must disgorge all profits to the Company regardless of whether they had knowledge of Company Material Nonpublic Information. Under these provisions, the receipt of an option under the Company's option plans, the exercise of an option under the Company's option plans, the acquisition of stock upon the settlement of RSUs and/or the receipt of stock under the Company's employee stock purchase plan are not typically deemed a purchase under Section 16. However, the sale of any such stock is a sale under Section 16, such that the purchase and sale must be reported on Form 4. In addition, Section 16 Individuals must not make a short sale of the Company's stock. The Company will provide separate memoranda and other materials to Section 16 Individuals regarding compliance with Section 16.

Potential Criminal Liability, Civil Liability, and/or Disciplinary Action

Insider trading violations can lead to substantial discipline, liability, and reputational damage:

A. **Liability for Insider Trading**. Covered Persons who violate these provisions may be subject to significant fines and penalties, and imprisonment.

B. **Liability for Tipping**. Covered Persons may also be liable for improper transactions by any person to whom they have disclosed Company Material Nonpublic Information, made recommendations, or expressed opinions regarding trading in the Company's securities. This applies to trading in the Company's securities as well as the securities of any other company on the basis of Company Material Nonpublic Information or Other Company Material Nonpublic Information. For example, if an employee learns that the Company is entering into a contract with another public company, then the employee is prohibited from trading in or advising others regarding trades in the securities of that other company based on Company Material Nonpublic Information or Other Company Material Nonpublic Information. Regulatory authorities use sophisticated electronic surveillance techniques to uncover insider trading and have imposed large penalties even when the disclosing person did not personally profit from the trading.

C. **Disciplinary Action**. Covered Persons who violate this policy will also be subject to disciplinary action by the Company, including disqualification from participation in the Company's equity incentive plans, up to and including termination of employment.

D. **Reputational Damage**. Note that reputational damage may result even in the absence of criminal or civil penalties. An SEC investigation alone can tarnish or irreparably damage a career.

Certification and Questions

All Covered Persons will be required to certify in writing their understanding of and intent to comply with the Insider Trading Policy on the commencement of their relationship with the Company. In addition, all Covered Persons will be required to certify their compliance with the Insider Trading Policy on an annual basis.

Please direct all questions or concerns related to this policy to the Company's Insider Trading Compliance Officer.

INSIDER TRADING COMPLIANCE OFFICER

Appointment of Insider Trading Compliance Officer

The Company's Compliance Officer shall also serve as the Company's Insider Trading Compliance Officer.

Duties of Insider Trading Compliance Officer

The duties of the Insider Trading Compliance Officer include, but are not limited to:

- Pre-clearance of all transactions involving the Company's securities by all Access Persons, in order to determine compliance with the Insider Trading Policy, applicable law, Section 16, Rule 10b5-1, and Rule 144;
- Review of Rule 10b5-1 Trading Programs;
- Assist in the preparation of Section 16 reports (Forms 3, 4, and 5) for all Section 16 Individuals;
- Provide reminders to all Section 16 Individuals regarding their obligations for Section 16 reports (Forms 3, 4, and 5);
- Perform cross-checks of available materials related to trading activity by officers, directors, and others with access to Company Material Nonpublic Information. Materials to be reviewed include Form 144, Forms 3, 4, and 5, officer and director questionnaires, and reports received from the Company's stock administrator and transfer agent;
- Distribution of the policy each year to those who have or may have access to Company Material Nonpublic Information;
- Notification to Access Persons of each administrative blackout period under any retirement or pension plan, including individual account retirement or 401(k) plans; and
- Provide any additional advice or assistance necessary to help Covered Persons comply with the Insider Trading Policy.

APPENDIX E: CORPORATE COMMUNICATIONS POLICY

ADMA Biologics, Inc. (ADMA or the "Company") adopted this policy in order to ensure that the information contained in all of its public communications is consistent, accurate, fair, and timely. The Company is committed to the fair disclosure of information about the Company consistent with the U.S. Securities Exchange Commission's (the "SEC") Regulation Fair Disclosure ("Regulation FD").

Material Nonpublic Information

Information is "Material Nonpublic Information" if: (1) there is a substantial likelihood that the information would be considered important to an investor making an investment decision regarding the transaction of securities ("material information"), and (2) it has not been previously disclosed to the general public and is otherwise not available to the general public ("nonpublic information").

The below categories of Company information are particularly sensitive and should be considered Material Nonpublic Information:

- Financial results
- Sales of Company products
- Company products demand from distributors and end users
- Projections of future earnings or losses
- News of a pending or proposed merger or acquisition
- A Company restructuring
- News of the disposition of a subsidiary
- Major marketing changes
- A significant cybersecurity incident, such as a data breach, or any other significant disruption in the Company's information technology infrastructure
- Significant related party transactions
- Impending bankruptcy or financial liquidity problems
- Gain or loss of a substantial customer or supplier

- Procurement or loss of significant contracts
- Status of significant projects/initiatives
- Changes in dividend policy
- New product announcements of a significant nature
- Results of any clinical trials
- Significant product defects or modifications
- Significant operations-related information
- Significant pricing changes
- Stock splits
- New equity or debt offerings
- Potential for significant litigation exposure
- Changes in senior management
- The establishment of, or any significant developments or changes regarding, a repurchase program for Company securities, including the Company's stock repurchase plan for its common stock (such as planned repurchases, increases or decreases in the program's authorization, suspensions and similar changes)
- The imposition of an event-specific restriction on trading in Company securities or the securities of another company or the extension or termination of such restriction

Disclosure of Material Nonpublic Information Prohibited

The Company's employees, officers, directors, advisors, consultants, agents and independent contractors (collectively, "Covered Persons") shall not make public disclosures of Material Nonpublic Information about the Company except as provided for by SEC rules and regulations, including Regulation FD. The prohibition on disclosures is not limited to express, spoken language, as information can also be disclosed through tone, emphasis, demeanor, coded language, or body language ("winks" and "nods"). Even commenting on or updating previously disclosed historical information may constitute a disclosure of Material Nonpublic Information. Discussing previously disclosed historical information about the Company or information that is generally known and/or available to the public is not prohibited.

If a Covered Person believes (or is uncertain whether) he or she has disclosed Material Nonpublic Information to a non-Covered Person, he or she must immediately inform the Compliance Officer of the potential disclosure. The Compliance Officer, the Chief Executive Officer and outside corporate counsel will conduct an investigation and/or take appropriate corrective steps, if necessary.

If the Compliance Officer, the Chief Executive Officer and outside corporate counsel determine that Material Nonpublic Information was disclosed to a non-Covered Person, the Company may be required to make prompt public disclosure of the information by issuing a news release, furnishing or filing a Form 8-K with the SEC, or otherwise ensuring broad public distribution of such information. If the Compliance Officer, the Chief Executive Officer and outside corporate counsel determine that Material Nonpublic Information was selectively disclosed in circumstances requiring public disclosure under Regulation FD, the Company will take such corrective public disclosure action as required by Regulation FD and other applicable law, in consultation with outside counsel.

Authorized Spokespersons

Only the individuals in the following Company positions may communicate on behalf of ADMA with Securities Market Participants[2]: Chief Executive Officer, Chief Financial Officer, or a representative of the Investor Relations Department (following approval from the Chief Executive Officer) (each, a "Spokesperson"). At least one Spokesperson must participate in all communications with Securities Market Participants. Covered Persons who are not authorized to speak on behalf of the Company must refer all inquiries from the media or Securities Market Participants to a Spokesperson.

Public Communications

For all written public communications initiated by the Company, the Investor Relations Department will draft and circulate a press release to a Spokesperson. The Spokesperson will review and revise the press release with the input of the Chief Executive Officer and Chief Financial Officer, and then provide it to the Compliance Officer and outside counsel for their review. The Spokesperson will work with the Chief Executive Officer, Chief Financial Officer, Compliance Officer and outside counsel to finalize the press release for publication.

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[2] "Securities Market Participants" consists of stockholders, analysts, institutional investors, investment advisors, broker/dealers, institutional investment managers, and investment companies.

For all other public communications, including requests from customers, suppliers, vendors, or others, the Investor Relations Department will review the request. The Investor Relations Department, Chief Executive Officer, Chief Financial Officer and Compliance Officer must authorize, review, and approve any public communications made on behalf of the Company.

A Spokesperson must accompany senior management in any meetings or discussions with Securities Market Participants to ensure the Company avoids the disclosure of Material Nonpublic Information.

Quarterly Earnings Releases and Teleconferences

The Company will observe a quiet period during which it will not comment on its earnings, earnings estimates, or other prospective financial results. Generally, the quiet period begins ten calendar days prior to the end of each quarter and ends when the Company's earnings information for the quarter is made public. Notwithstanding the foregoing, the Company may update its quarterly or full-year outlook during a quiet period by broad public dissemination of a guidance release and/or by analyst/media conference call in accordance with the procedures described herein, and may comment on its quarterly or full-year guidance update for a brief period of time after public release if such comment is limited to the public record (including the update and associated analyst / media call) and does not constitute selective disclosure of material nonpublic information. Additionally, notwithstanding the foregoing, members of senior management may engage in discussions with analysts and/or professional investors during the quiet period from time to time in compliance with Regulation FD.

The Company will hold quarterly teleconferences open to the public and the media to discuss its quarterly and annual financial results and certain significant business-related events. The Company will provide public notice of the teleconference through a press release electronically, posting on at least one public financial information website, and posting on the Company website. Prior to the teleconference, the Company will provide its quarterly earnings press release to teleconference participants. The quarterly earnings press release will be furnished to the SEC on a Form 8-K before the teleconference. Analysts and professional investors with teleconference access may participate in the Question-and-Answer portion of the call. Other members of the public will generally have access to listen to the teleconference through the Company's website or a conference bridge. The Company will attempt to respond to questions during the time allotted, but reserves the right not to respond to any question or to refuse to allow questions from certain call participants. After the teleconference, the Company may post an audio transcript of the call on the Company's website for up to 12 months. All transcripts and archived materials on the Company's website are considered time-dated and the Company undertakes no obligation to update such information, which shall not later be considered a current representation of the Company's views or forecasts.

As needed, from time to time, the Company will hold topical investor conference calls open to the public and media, and provide public notice about the call through a media release, by electronic distribution, posting on at least one well-known public financial information website, and the Company website.

Following any conference call or public comment, the Company will not provide new material information or elaborate in a material way beyond what was covered during the conference call or public comment.

Analyst Reports

The Company will not comment on analyst reports. But a Spokesperson may review and/or comment on the accuracy of historical data contained in draft analyst reports. Spokespersons should base all comments or responses on materials that have already been publicly disclosed.

The Company will not distribute analyst reports externally. The Company may utilize its website to provide the names and firms of analysts that have conducted research on the Company.

Presentations

The Company will utilize the Private Securities Litigation Reform Act of 1995 safe harbor guidelines for forward-looking information as part of any individual, group, and investor conference communications. The Company may participate in other forums at which Securities Market Participants could be present, including industry seminars, broker-hosted investor conferences, trade shows, employee meetings, retiree meetings or annual stockholder meetings, and meetings with commercial partners that are stockholders. The Company will avoid the disclosure of any Material Nonpublic Information during these meetings.

Communication with the Media

Although Regulation FD does not apply to communications with the media, the Company will attempt to publicly disclose Material Nonpublic Information before it is discussed with media representatives.

The Company will generally avoid commenting on rumors or speculation related to its business or otherwise. Only Spokespersons may speak on behalf of the Company in response to any media inquiries. Covered Persons must not respond to media inquiries regarding the Company and should direct media inquiries to a Spokesperson.

Compliance with and Enforcement of this Policy

All Covered Persons should carefully comply with this policy because violations of Regulation FD may result in actions by individuals or the SEC, which may result in a cease-and-desist order, litigation or financial penalties. Violations of this policy will also result in discipline by the Company, up to and including termination of employment.

All questions or concerns about this policy should be directed to the Compliance Officer.

APPENDIX F: WHISTLEBLOWER POLICY

ADMA Biologics, Inc. (the "Company") is committed to the highest possible standards of openness, propriety and accountability. In line with this commitment, the Company expects and encourages its employees or anyone else who has concerns about any aspect of the Company's business to come forward and voice those concerns. However, the Company requires more than just a willingness and commitment. It requires that all Covered Persons (as defined below) recognize and acknowledge that it is their responsibility to promptly report any instance of suspected or known noncompliance, or if they learn of or are asked to participate in an activity that could potentially violate any Company policy, law, or regulation. The Company is committed to correcting any errors and requires all Covered Persons to make the same commitment to reporting errors so that they can be appropriately addressed.

All Covered Persons are encouraged to report all evidence of activity by any department of the Company or Covered Person that may constitute:

- fraud of any kind, including but not limited to corporate fraud or any other act of dishonesty;
- unethical business conduct, including violations of the Code of Ethics and Business Conduct (the "Code of Conduct") or any other Company policy;
- a violation of federal, state, local or any other law or regulation; or
- substantial and specific danger to individual or public health and safety.

Any Covered Person who reports evidence of alleged improper activity should contact Human Resources. Employees are encouraged to provide as much specific information as possible, including names of individuals involved, dates, places, and events that took place, the employee's perception of why the incident(s) may be a violation, and what corrective action the employee recommends.

Investigation

Reports of activities that may relate to a violation of law or Company policy will be investigated promptly. The steps of an appropriate investigation cannot be fixed in advance, but will vary depending upon the nature of the allegations. The Company will seek to maintain confidentiality throughout the investigative process to the extent practicable and consistent with the Company's need to undertake a full investigation.

Resolving The Matter

Upon completion of the investigation, the Company will take appropriate remedial action. Remedial action may include oral or written counseling, referral to formal counseling, disciplinary suspension or probation, or discharge from the Company.

Non-Retaliation

The Company prohibits retaliation against anyone for making a good faith report about a potential violation of law or Company policy. Retaliation is a serious violation of this policy and those who believe they have been subjected to, or witnessed, retaliation should report it immediately to Human Resources. In addition, no employee may be adversely affected because the employee refused to carry out a directive which, in fact, constitutes corporate fraud or is a violation of federal, state, local, or any other law or Company policy.

Communication

This policy is part of the Company's overall commitment to open communication. The Company encourages any employee with workplace concerns of any nature (including, but not limited to, any alleged discrimination) to bring those concerns to the attention of Human Resources.

The Company is committed to the highest possible standards of openness, propriety and accountability. In line with this commitment, the Company expects and wants its employees or anyone else who has serious concerns about any aspect of the Company's business to come forward and voice those concerns. However, the Company requires more than just a willingness and commitment. It requires that all Covered Persons recognize and acknowledge that it is their responsibility to promptly report any instance of potential or suspected noncompliance or activity that may violate any Company policy or any law or regulation. The Company is committed to correcting any errors and requires the same commitment from Covered Persons. This policy makes it clear that you can make a good faith report of concerning activity without fear of retaliation of any kind.

No Prohibition of Lawful Activities

Nothing in this policy, the Code of Conduct, or other Company policy shall prohibit or restrict Covered Persons from lawfully: (a) initiating communications directly with, cooperating with, providing relevant information to or otherwise assisting in an investigation by the Securities and Exchange Commission ("SEC") or any other governmental or regulatory body or official(s) or self-regulatory organization ("SRO") regarding a possible violation of any applicable law, rule or regulation; (b) responding to any inquiry from any such governmental or regulatory body or

official or SRO or governmental authority; or (C) testifying, participating, or otherwise assisting in an action or proceeding relating to a possible violation of any such law, rule or regulation. Further, nothing in this policy, the Code of Conduct, or other Company policy shall prohibit or restrict Covered Persons (or their attorneys) from initiating communications directly with, or responding to any inquiry from, or providing testimony before, the SEC, or any other SRO or any other federal or state regulatory authority regarding any potentially fraudulent or suspicious activities. Employees are not required to notify the Company of any such communications, cooperation, assistance, responses to inquiries, testimony or participation as described in this paragraph.

ACCOUNTING AND AUDITING MATTERS

The Audit Committee of the Board of Directors of the Company (the "Audit Committee") has established procedures for: (a) the receipt, retention, and treatment of complaints received by the Company regarding accounting, internal accounting controls, or auditing matters; and (b) the confidential, anonymous submission of concerns regarding questionable accounting or auditing practices by employees, officers, directors, advisors, consultants, agents, independent contractors and others acting on behalf of the Company (collectively, "Covered Persons"). It is Company policy to comply with all applicable legal and regulatory requirements related to accounting, internal accounting controls, and auditing.

Reporting Concerns

If any Covered Person believes that the Company or a Covered Person might have violated the Company's accounting rules, internal accounting controls or procedures, or auditing rules, they must immediately report the suspected violation to the Chairperson of the Audit Committee.

Reports of suspected violations must be detailed and clear as to the suspected violation, including all of the relevant information that the Covered Person has regarding the concern. Any Covered Person may provide personal contact information to allow for follow-up related to the concern. Alternatively, reports of suspected violations by a Covered Person may be submitted anonymously. The Company cannot properly investigate a concern, and may not undertake an investigation, into broad allegations or unspecified alleged wrongdoing without sufficient detail.

The Company will attempt to maintain confidentiality related to reports of suspected violations by a Covered Person, but shall do so to the fullest extent reasonable and consistent with the need to conduct an adequate investigation and/or take appropriate corrective action.

Reports of suspected violations may be submitted to the Chairperson of the Audit Committee as follows:

- In writing and mailed to the following address, with "Submitted Pursuant to the Whistleblower Policy" written on the envelope:

Chairperson
Audit Committee
ADMA Biologics, Inc.
465 Route 17 South
Ramsey, New Jersey 07446

- In an email message sent to auditchair@admabio.com. Email messages may be sent from a business or personal email address, however the identity of a complainant who sends an email from Company computers or email accounts may not remain anonymous. Use of a non-identifiable email address such as a yahoo or hotmail address is the most confidential way to email a report of suspected violation.

Investigation

Upon receipt of a complaint pursuant to this policy, the Audit Committee will review the complaint and, if necessary, investigate and recommend or take appropriate remedial, disciplinary or other corrective action.

The Chairperson of the Audit Committee will assign one of the following persons as an investigator depending on the specific facts and circumstances: a member of the Audit Committee, the Chief Executive Officer, or the Compliance Officer. The investigator will conduct an appropriate investigation, including reviewing documentation, interviewing witnesses, and preparing an investigatory report with findings and/or recommendations. Written documentation related to the investigation will be retained pursuant to the Company's Document Retention Policy.

The investigator will provide the completed investigatory report to the Audit Committee. If appropriate, the Audit Committee will provide the investigatory report to the Chief Executive Officer and/or Chief Financial Officer.

Based on the investigatory report, the Audit Committee will take appropriate action. If the Audit Committee determines a violation of policy, auditing rules or procedures, accounting rules or procedures, or internal accounting controls has occurred, the Audit Committee may discipline the responsible person(s), revise accounting or auditing procedures to address issues, and/or report the violation to appropriate authorities. The Chairperson of the Audit Committee will discuss the investigatory findings and recommendations with the Chief Executive Officer and/or Chief Financial Officer to determine whether public disclosure, disclosure to appropriate authorities or agencies, and/or reporting to the Audit Committee and/or full Board of Directors is appropriate.

Retaliation Prohibited

The Company prohibits retaliation against (i) any person for submitting a good faith concern pursuant to this policy, or (ii) any person for participating in the investigation of a concern submitted pursuant to this policy. The Company requires truthful and prompt reporting of concerns related to potential violations of accounting or auditing procedures or policies.

It is the responsibility of the Company and each Covered Person to ensure compliance with legal and regulatory requirements related to accounting and auditing matters. A violation can subject the Company and Covered Persons to legal liability, regulatory investigation and adverse publicity, which can damage the Company's reputation and business. It is essential that the Company has the opportunity to promptly investigate and remedy any possible violations of accounting or auditing-related concerns, and therefore the Company relies on each Covered Person to ensure that it has an opportunity to undertake such an investigation.

A violation of this policy can subject the Company and Covered Persons to legal liability, regulatory investigation, and/or other adverse consequences.