



# CODE OF ETHICS AND BUSINESS CONDUCT

Updated October 2021



## 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 (the “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 (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. 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, or General Counsel. All other employees should

address questions about this Code of Conduct to the Company's Corporate Compliance Officer (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. Covered persons must obey all applicable laws, rules, and regulations of the United States and/or the jurisdiction 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, Company policies, and this Code of Conduct. Violations of the Code of Conduct or other ADMA policies may result in disciplinary action, 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 an annual certification of compliance with this Code of Conduct. However, failure to read this Code of Conduct or sign a confirmation 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 an employee of the Company, 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 employee involved. For purposes of this policy, a potential conflict of interest occurs when an employee's outside

interests (for example, financial or personal interests) interfere with ADMA's interests or the employee's work-related duties. For example, a conflict of interest can occur when an employee is in a position to influence a decision that may result in a personal gain for the employee or the employee'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. ADMA officers and directors must obtain the approval of the Board before accepting a position as an officer or director of another company or business.

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 to any covered persons. Salary advances of less than \$1,000.00 are not considered loans and may be permitted with supervisor approval.

## **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 employee and the Company. 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 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 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 material, non-public information from improper disclosure. It is unlawful for anyone with knowledge of material, non-public information to buy or sell ADMA stock, or to improperly disclose the information. All covered persons are bound by 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 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 upon the interests of the Company, any of its customers or its stockholders.

In particular, under no circumstances should any covered person make any statements to the news media that disparage 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 upon 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. 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 or General Counsel 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 count on that trust. If you learn information from them 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.

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 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.

### **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, 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 may result in Company discipline 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, and auditors. All personnel must cooperate with and provide requested information to the Board, accountants, 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 General Counsel 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 General Counsel.

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**

### **Environment Generally**

All Company employees should strive to conserve resources and reduce waste and emissions through recycling and other energy conservation measures. You 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 plasma-derived products 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. These activities do not include either industrial production or distribution, and therefore do not use raw

materials. Therefore, 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 will comply 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.

### **Health and Safety**

The Company is committed not only to comply with all relevant health and safety laws, but also to conduct 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 Human Resources department, the Compliance Officer or the Company's General Counsel. 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.

### **Employment Practices / Diversity**

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 gender, origin 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 our employment policies and procedures. Copies of the Company's detailed policies are available upon request. Company employees must comply with all applicable labor and employment laws, including antidiscrimination laws and laws related to freedom of association and privacy. 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, the Compliance Officer or the Company's General Counsel 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 tolerant 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, 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, the Compliance Officer or the Company's General Counsel. All complaints will be treated with sensitivity and discretion. Your supervisor, the Human Resources department, the Compliance Officer, General Counsel and the Company will protect your confidentiality to the extent possible, consistent with law and the Company's need to investigate your concern. Where our investigation uncovers harassment or discrimination, we will 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 relevant Human Resources personnel 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, “illegal drugs” includes marijuana). Drinking alcoholic beverages is prohibited while on duty or on the premises of the Company, except 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 encourage 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 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.

## **CONDUCT REGARDING OUTSIDE ACTIVITIES**

### **Responsible Citizenship**

ADMA is 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 offices and directors) will be determined on a case-by-case basis by the President and 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 the sole and 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 disclosed to stockholders along with the reasons for the waiver in accordance with Nasdaq Stock Market LLC requirements. If the Board grants a waiver to the Principal Executive Officer, the Principal Financial Officer, or the Principal Accounting Officer, or persons performing similar functions, from a provision of this Code of Conduct that is enumerated in Item 406(b) of Regulation S-K, that waiver must be promptly disclosed to stockholders in accordance with SEC requirements.

## **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, the Code of Conduct, and other ADMA policies through the appropriate reporting mechanism - typically, the Compliance Officer or the Company's General Counsel.

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 Brian Lenz, Executive Vice President and Chief Financial Officer, as the Compliance Officer. His contact information is:

Brian Lenz  
Corporate Compliance Officer  
ADMA Biologics, Inc.  
465 Route 17 South  
Ramsey, New Jersey 07446  
Phone: (201) 478-5552  
Fax: (201) 478-5553  
Email: [blenz@admabio.com](mailto:blenz@admabio.com)

The Company's General Counsel can be reached by contacting Michael A. Goldstein, Esq. at [mgoldstein@admabio.com](mailto:mgoldstein@admabio.com) or (561) 989-5553.

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 policy.



## **APPENDIX D: INSIDER TRADING POLICY**

ADMA has adopted the policies and procedures described herein in order to prevent insider trading. The Company prohibits trading based on Material Nonpublic Information regarding the Company or gained during the course of work for the Company. The policy covers all officers, directors, members of the scientific advisory board, employees, consultants, and independent contractors of the Company (including all Company affiliates or subsidiaries) (collectively, “Covered Persons”), who may have access to 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 Material Nonpublic Information on a more frequent basis than other employees. The current list of Access Persons is identified on Exhibits 1 and 2, and it will be updated periodically. The Insider Trading Compliance Officer will determine which Covered Persons will be designated as Access Persons. Under special circumstances, certain persons not defined as an Access Person under this policy may come to have access to Material Nonpublic Information. During any period that a person is in possession of 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 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 of the Company’s Covered Persons. This policy also applies to Family Members of Covered Persons. “Family Member” includes any spouse, partner, child, parent, sibling, grandparent, family-in-law, step-family, any person living in the same household, and/or the spouse or partner of the foregoing individuals. Covered Persons are responsible for compliance by their Family Members.

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 reasonable 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 (either positive or negative) are particularly sensitive and should be considered material information:

- Financial results
- Projections of future earnings or losses
- News of a pending or proposed merger or acquisition
- News of the disposition of a subsidiary
- Impending bankruptcy or financial liquidity problems
- Gain or loss of a substantial customer or supplier
- Procurement or loss of significant contracts
- Changes in dividend policy
- New product announcements of a significant nature
- Results of any clinical trials
- Significant product defects or modifications
- Significant pricing changes
- Stock splits
- New equity or debt offerings
- Potential for significant litigation exposure
- Changes in senior management

***Applicability to Material Nonpublic Information Regarding Other Companies***

This policy and the guidelines described herein also apply to Material Nonpublic Information relating to other companies, including the Company's collaborative partners, customers, vendors, or suppliers (collectively, "business partners"), or competitors, when the Material Nonpublic Information is obtained in the course of employment or services performed for the Company. Covered Persons must not engage in transactions of securities for the Company's business partners or competitors while in possession of their Material Nonpublic Information.

## **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 Material Nonpublic Information.

The Company has also determined that those persons identified on Exhibit 2 (collectively, the individuals identified on Exhibit 2 and Section 16 Individuals are “Access Persons”) are subject to the pre-clearance requirement described below because they are likely to have access to 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 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 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 Material Nonpublic Information concerning the Company, 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 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 confidentiality 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 Access 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 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 by the Insider Trading Compliance Officer. The Insider Trading Compliance Officer will review the proposed transaction for compliance with regulatory requirements.

The Company may also find it necessary, from time to time, to require that certain Covered 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. Unless otherwise specified, this prohibition does not apply to the sale of: (a) stock acquired upon the exercise of stock options, or (b) 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 the stock again at a lower price to replace the borrowed shares within a short period of time.
- Covered Persons may not purchase Company stock on margin. However, 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.

D. **Rule 10b5-1 Trading Programs.** Individuals may trade on Company securities in certain circumstances where it is clear that Material Nonpublic Information was not a factor in the decision to trade. Per Rule 10b5-1, an individual who buys or sells securities while aware of Material Nonpublic Information does not violate Rule 10b5 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 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 or Exhibit 2 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.** Access Persons 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 Access Person is the Insider Trading Compliance Officer, the Board) prior to finalization;
- the contract is entered into when the Access Person is not in possession of any Material Nonpublic Information and not subject to any blackout period;
- the Access Person does not cancel or make any changes to the contract while in possession of any 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 Access Person is the Insider Trading Compliance Officer, the Board); and
- the contract does one of the following:
  - specify 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;
  - include a written formula or algorithm for determining the amount of securities to be purchased or sold, and include the price and date of their purchase or sale; or

- delegate all power to a third party who does not have access to any 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 will likely 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.

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

***In order to ensure compliance with Rule 10b5-1, any trading plan or amendment must be submitted to the Insider Trading Compliance Officer for review and approval in advance of entering the plan or amendment.***

F. **Trading Restrictions During Administrative Blackout Periods.** Access Persons are prohibited from trading in any Company securities during any period of three or more consecutive days during which at least 50% of the participants or beneficiaries in a Company individual account retirement plan are unable to purchase, sell, or otherwise acquire or transfer an interest in the equity of the Company held in such plan due to a temporary suspension by the Company or the plan fiduciary (“administrative blackout period”) unless the individual has established a pre-arranged trading plan that complies with Rule 10b5-1. Individual account plans include, without limitation, defined contribution plans such as broad-based tax-qualified 401(k) plans and profit-sharing plans, stock bonus plans, and similar plans.

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, and (2) the purchase of shares under any Company employee stock purchase plan (but not the sale of any such shares). Individuals may perform these transactions at any time, unless the Company specifically instructs you otherwise.

## **Additional Information for Directors and Officers**

Section 16 Individuals must also comply with the reporting obligations and limitations on short-selling 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 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, 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 fines of up to \$5,000,000, penalties of up to three times the profit gained or loss avoided, and up to 20 years imprisonment.
  
- B. **Liability for Tipping.** Covered Persons may also be liable for improper transactions by any person to whom they have disclosed material or 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 nonpublic or material 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 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;
- Mail 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 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 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 F: WHISTLEBLOWER POLICY**

The Company is committed to the highest possible standards of openness, propriety and accountability. In line with this commitment, we expect and encourage our 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 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 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 wants to report 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. 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.

## **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, we expect and want our 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 employees 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 employees (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**

Section 301 of the Sarbanes-Oxley Act of 2002 requires ADMA, through its Audit Committee, to establish 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](mailto: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 President and Chief Executive Officer, the Compliance Officer or the General Counsel. 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 Chairman 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 have 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.