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Dear Colleagues,

At CorMedix, our Mission is to deliver therapies to patients facing serious and life-threatening conditions. The work we do matters deeply, and so does the way we do it.

Our Code of Conduct reflects our commitment to conducting business with integrity and earning the trust of our patients, healthcare partners, shareholders, and one another. It provides the principles that guide how we work together, make decisions, and represent CorMedix every day.

As CEO, I am personally committed to maintaining a culture of integrity, accountability, and compliance and expect the same commitment from every colleague. Integrity is fundamental to earning and maintaining the confidence of those who depend on us. Each of us is accountable for speaking up when something doesn't seem right, asking questions when we need guidance, and treating one another and our patients, customers, and suppliers with honesty, respect, and professionalism.

No Code can address every situation we may encounter. That is why I ask each of you to use sound judgment consistent with the principles in this Code, act with integrity, speak up when something does not seem right, and seek guidance when you need it. The choices we make—large and small—shape our culture and help protect the reputation we have worked hard to build.

We are each responsible for understanding and following the Code and the policies and procedures that support it. Just as important, we must treat one another with respect, professionalism, and accountability and foster an environment where concerns can be raised without fear of retaliation.

Thank you for your commitment to our Mission, our Core Values and Behaviors, and the patients we serve. Together, we will continue to build a company known not only for the therapies we provide, but for how we conduct ourselves.

Sincerely,

Joe Todisco

Chief Executive Officer



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OUR COMMITMENT AS A COMPANY

CorMedix’s Mission

Our Mission We develop and deliver breakthrough therapies for the prevention and treatment of life-threatening illnesses, ensuring patients have access to our innovative products while building an organization that values integrity, collaboration, and performance.

Our Vision Transforming patient outcomes by delivering vital therapies through innovation, integrity, and accountability.

Here at CorMedix (“CorMedix,” “Company,” “we,” “us” or “our”), everything we do to achieve our Mission has to be rooted in the highest standards of integrity and has to comply with the laws and regulations that govern our industry. CorMedix’s Code of Conduct (the “Code”) captures the standards we hold ourselves to and defines how we interact with patients, customers, payers, suppliers, the healthcare community, and one another. It’s the foundation we stand on every day — making sure our activities and interactions are always grounded in respect, trust, and integrity, and focused on the care of patients.

Compliance with the Code is critical to CorMedix fulfilling its Mission and succeeding as an organization. We all share in that responsibility.

Please take the time to read through the Code carefully so you can apply its principles in your day-to-day work — and keep it close so you can come back to it whenever you need to.

Bringing Our Mission and Values to Life

Compliance with the Code is required of all colleagues. CorMedix will review and investigate potential violations of the Code and supporting policies and procedures, and will take appropriate corrective action when warranted. Violations may result in disciplinary action, up to and including termination of employment, termination of contractual relationships, or other appropriate consequences.

The Code applies to all CorMedix employees, officers, and directors — referred to together as “colleagues” throughout this Code. We also expect our business partners — including vendors, suppliers, consultants, contractors, and others who act on CorMedix’s behalf — to uphold standards consistent with this Code when they work with or for us. The Code also applies wherever we do business, including in our research and development activities.

If you’re ever not sure how to comply, or whether a particular guideline applies to you, just ask. Your manager, the Executive Leadership Team (“ELT”), and the Legal and Compliance and Human Resources (“HR”) Teams are all here to help.

CorMedix policies and procedures are available through Company-designated systems and resources. If you need help finding them, just reach out to your manager, [Legal](#), [Compliance](#), [HR](#), or [Quality](#).



CorMedix’s Compliance Program

CorMedix and its leadership are committed to conducting business ethically, with integrity, and in compliance with applicable laws, regulations, and Company policies and procedures. Compliance is fundamental to achieving our Mission, maintaining the trust of our patients, customers, shareholders, and business partners, and protecting the reputation we’ve worked so hard to earn.

The CorMedix Compliance Program supports that commitment and helps promote legal and ethical conduct throughout the Company. Our Compliance Program is built on a framework of policies, procedures, standards, training, and controls designed to prevent, detect, and address conduct that doesn’t conform to the standards outlined in this Code or otherwise violates applicable law or Company policy.

CorMedix views compliance as a shared responsibility and has established the Governance & Compliance Committee to reinforce our Compliance Program, advance its objectives, and enhance its effectiveness.

NEED MORE INFORMATION?

For more information, please also review:

- [CorMedix’s Policies and Procedures Central Repository](#)
- [HHS Office of Inspector General \(OIG\), Compliance Program Guidance for Pharmaceutical Manufacturers](#)
- [PhRMA’s Code on Interactions with Healthcare Professionals](#)



Our Values and Behaviors

Our Core Values and Behaviors are the principles that guide our decisions, actions, and interactions — shaping how we work, how we conduct our business, and how we fulfill our Mission. They’re fundamental, indispensable, and recurring themes that drive our culture and our daily interactions. They’re inseparable from how we show up every day. CorMedix’s Mission and Vision, combined with our Values and Behaviors, define who we are as a company.



Integrity & Trust

We act honestly and ethically, earning and maintaining the trust of patients, partners, and colleagues.



Performance & Accountability

We hold ourselves accountable for achieving results at every level.



Innovation & Learning

We embrace curiosity, courage, and continuous learning to drive improvement and scientific excellence.



Care & Community

We care deeply for patients and each other, fostering a culture that looks for opportunities to support those we serve.



Collaboration & Partnership

We work together as one team, building strong partnerships across functions and with external stakeholders.

Using Sound Judgment and Asking Questions

The Code gives us the principles that guide how we act, but it can’t anticipate every situation we’ll face. Each of us is expected to understand and apply its principles, use sound judgment, and act in a way that reflects our Values and Behaviors. That means following the intent and spirit of the Code, applicable laws and regulations, and Company policies — even when no specific rule covers the exact situation you’re in.

When you run into a situation that isn’t covered by a CorMedix policy or procedure and you need to make a judgment call, ask yourself:



Asking questions is a fundamental part of being innovative and courageous — so please don’t hesitate. All of us should always feel comfortable reaching out to our manager, a member of the ELT, or CorMedix’s [Legal](#), [Compliance](#), and [HR](#) colleagues if we have questions about any element of the Code, laws and regulations, or Company policies and procedures and how they apply to our daily work.



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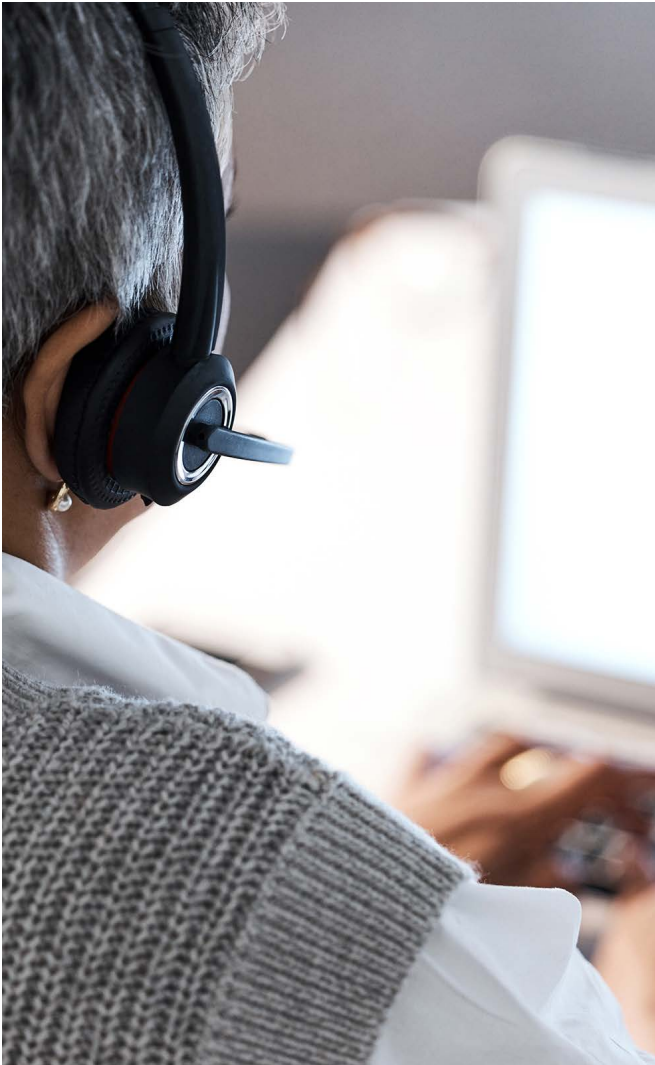
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Reporting Concerns

Living our Mission, Values and Behaviors — and acting with courage — is at the heart of how we apply the Code. Every colleague must ask questions, seek guidance, and raise concerns. If you believe in good faith that any CorMedix colleague has violated applicable law, CorMedix policy or procedure, or the Code, report it right away so we can identify and correct problems early.

How do I report a good faith concern?

We want everyone to feel comfortable raising concerns or asking questions — we’ve got your back. CorMedix follows an “Open Door Policy”: discuss any concern with your manager, a member of the ELT, or the [Compliance](#), [Legal](#), or [Human Resources teams](#), without fear of retaliation.



What is a good faith concern?

A good faith concern is an honestly held belief that conduct may be inconsistent with our Code, Company policies or procedures, or applicable laws or regulations — even if an investigation later finds no violation occurred.

CorMedix encourages colleagues to raise good faith concerns and won’t tolerate retaliation against anyone who does so.

Knowingly making a false or intentionally misleading report, or raising a concern maliciously, is inconsistent with our Values and Behaviors and may result in discipline, up to and including termination of employment or engagement.

CorMedix also maintains an anonymous [Ethics & Compliance Helpline](#) (the “Helpline”), available 24/7 and staffed by trained, independent third-party personnel.

Protected Reporting. While the Company prefers to address matters internally first, internal reporting is encouraged but not required. Nothing in this Code prohibits you from reporting suspected illegal activity — including any violation of federal, state, local, or foreign law, rule, or regulation — to any government, regulatory, or law enforcement authority, or from participating or testifying truthfully in any investigation, inquiry, or legal proceeding. You need no permission from, and need not notify, the Company to do so, and you may disclose or retain Company information only as reasonably necessary for such protected reporting. We will not retaliate against you for protected reporting. This paragraph controls over any conflicting provision of the Code, any Company policy, or any confidentiality, nondisclosure, employment, separation, or other agreement.

Outside protected reporting, your confidentiality, privacy, and records obligations under the Code, Company policy, and your agreements continue to apply, and knowingly false reports are not protected.



Is my report confidential?

When you raise a concern or report a violation through the Helpline, you can remain anonymous or share your name and contact information. Sharing it makes it easier for us to investigate. The Helpline sends no notifications to those who make a report, so log back in to see our follow-up and decide whether to respond.

When you’ve shared your identity — whether through the Helpline or internally — we’ll make every effort to keep the reported information and your identity confidential, sharing it only as needed. In some cases, though, the nature of the investigation may make that impossible.

What are my obligations if I receive a report or concern of a potential violation?

If you receive notice of a Code or policy violation — especially as a manager — you must:

- Support those who raise good faith concerns, treat them with respect, and never let them feel ignored or minimized.
- Document the concern and immediately report it to the appropriate department head or to [Legal](#), [Compliance](#), or [HR](#).
- Never investigate or try to resolve a concern on your own, without guidance from [Legal](#), [Compliance](#), or [HR](#).
- Don’t retaliate against anyone for raising a concern or reporting a suspected violation, and promptly report any suspected retaliation to [Legal](#), [Compliance](#), or [HR](#).



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What happens after I file a report with the Helpline?

If you used the Helpline, the specialist you contacted will put together an objective report based on your call and share it with CorMedix’s Compliance designees, [Chief Legal Officer](#), and — depending on the nature of the report — CorMedix’s [Chief Human Resources Officer](#) for review and investigation, as warranted.

CorMedix expects all colleagues to cooperate fully with any inquiry or investigation and to maintain the confidentiality of all information relating to an investigation. Non-cooperation may subject an employee to disciplinary action, up to and including termination of employment.

What is CorMedix’s non-retaliation policy?

CorMedix is committed to a culture where all colleagues are treated with respect and where trust, integrity, and open communication are expected in every interaction. We encourage all CorMedix colleagues to raise concerns openly, respectfully, and as soon as possible. Providing a safe environment for colleagues to raise issues is critical to ensuring the fulfillment of our Mission and Vision.

CorMedix doesn’t tolerate retaliation of any kind — including for good faith reporting of a concern — and will take disciplinary action, up to and including termination, against anyone who threatens or engages in retaliation or harassment of any other person who has reported or is considering reporting a concern in good faith. Colleagues who report through the [Helpline](#) may choose to remain anonymous, and where a reporter’s identity is known to us, we make every effort to keep it confidential, within the limits of the law. While reporting won’t insulate a person making the report from responsibility for wrongdoing or from ongoing performance problems, prompt and forthright disclosure and cooperation will generally serve as a mitigating factor in determining any consequences for that employee.

What are the consequences for violating the Code or CorMedix policy?

CorMedix reviews all complaints and allegations to determine whether an investigation is warranted, and if so, whether violations of the Code or our policies and procedures have occurred. If violations are found, appropriate measures will be taken. If the alleged violation involves an executive officer or a director, the Company or Board of Directors may engage a third-party investigator to conduct a full and impartial investigation to determine whether a violation of the Code or policy has occurred.

Our Code reflects the respect, trust, and integrity that are foundational to our culture. Failure to comply with the standards outlined in the Code — including failure to cooperate fully with any investigation — will result in disciplinary action to be determined by CorMedix in its sole discretion, including, but not limited to, verbal or written warnings, probation, suspension with or without pay, and termination of employment.

Certain violations of the Code may require CorMedix to refer the matter to the appropriate governmental or regulatory authorities for investigation or prosecution and may result in civil or criminal penalties for the individuals involved. Moreover, any manager who directs or approves of conduct in violation of the Code, or any colleague who has knowledge of such conduct and doesn’t immediately report it, may also be subject to disciplinary action.

You can reach our Helpline:



By phone: 1 (855) 433-9925



Online: cormedix.ethicspoint.com



By using your smartphone or tablet:
cormedixmobile.ethicspoint.com





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Expected Workplace Conduct and Speak Up Policy

CorMedix expects all colleagues to contribute to a workplace where people are treated with respect, professionalism, and dignity. We don't tolerate conduct that undermines that expectation — including harassment, bullying, discrimination, intimidation, threats, or other offensive or inappropriate behavior.

Examples may include unwelcome sexual advances, derogatory comments based on legally protected characteristics, bullying or abusive conduct, intimidation, threats, or physical or verbal conduct that creates an intimidating, hostile, or offensive working environment.

If something feels improper, disrespectful, unsafe, or just makes you uncomfortable, please speak up. Report concerns to your manager, [Chief Legal Officer](#), [Chief Human Resources Officer](#), or the [Helpline](#). As noted, CorMedix prohibits retaliation against any colleague for raising a good faith concern regarding a violation or possible violation of Company policy or the Code.



Questions & Answers

One of my coworkers makes jokes that I find offensive and that they find to be funny. I don't think they intend to cause harm to anyone, but I worry that others may be offended. What should I do?

Whether or not you speak directly with your coworker, you should report the behavior to your manager, CorMedix's [Chief Legal Officer](#), [Chief Human Resources Officer](#), or the [Helpline](#). Speaking up helps ensure that our working environment remains anchored in respect, trust, and integrity.

Health and Safety of Our Workplace

CorMedix is committed to providing a safe workplace for our colleagues, and we all share in that responsibility — by following the rules, practices, and other requirements designed to safeguard public health and safety. If you're ever involved in or become aware of any accidents or injuries, or any practices or conditions that impact the health and safety of our working environment or our colleagues, immediately notify your manager, [Chief Legal Officer](#), [Chief Human Resources Officer](#), or use the [Helpline](#).

Being under the influence of alcohol or drugs, or abusing medication, not only diminishes an individual's ability to perform, but can also compromise the safety and well-being of our colleagues and, in certain instances, the public. The sale, purchase, solicitation, possession, or use of any illegal substance while on Company property or while conducting Company business is prohibited. Abuse of alcohol or prescribed or over-the-counter medications is also not permitted in our workplace.



OUR COMMITMENT TO EACH OTHER

Equal Employment Opportunity and Respectful Treatment

CorMedix is committed to equal employment opportunity and to treating employees and applicants with respect and fairness. We genuinely value the different cultural backgrounds, perspectives, and life experiences our colleagues bring to their work, and we expect everyone to contribute to a professional and respectful workplace. Consistent with our values, employment decisions are based on qualifications, skills, experience, performance, and business needs. CorMedix is an equal opportunity employer. We do not discriminate against any individual on the basis of any status protected under applicable federal, state, or local law, including disability and protected veteran status. We're committed to maintaining a workplace where everyone is expected to act professionally, respectfully, and consistent with our Code.

Remote Working

CorMedix is committed to providing work arrangements that support our business needs, our culture, and our colleagues. Whether you're working at a Company location, from home, while traveling, or in another approved setting, you're expected to conduct Company business with the same integrity, professionalism, accountability, and care.

When working remotely, colleagues must remain available and responsive during working hours, protect Company information and assets, use Company-approved systems, networks, remote-access methods, and devices, and follow all applicable Company policies and procedures. This includes taking appropriate steps to safeguard confidential information, maintain data privacy and security, protect screens, conversations, documents, and devices from unauthorized viewing or access, lock unattended devices, promptly report any lost or stolen device or suspected compromise to IT, create and retain records appropriately, and use Company resources responsibly. Remote work shouldn't compromise collaboration, productivity, data security, or our ability to meet our responsibilities to patients, customers, colleagues, and the Company.



If you're ever unsure whether a remote work arrangement, location, or practice is appropriate, seek guidance from your manager, [HR](#), [IT](#), [Legal](#), or [Compliance](#).

Screening for Exclusions and Debarment

CorMedix is committed to working with employees, healthcare professionals, contractors, consultants, and other third parties who are qualified and eligible to participate in activities conducted on behalf of the Company. To support that commitment and comply with applicable legal and regulatory requirements, we don't engage individuals or entities that are restricted, excluded, ineligible, or debarred in a manner that could preclude participation in a clinical trial or a government healthcare program.

These restrictions may include debarment, exclusion, disciplinary actions, or other matters affecting a professional or practitioner license. CorMedix screens colleagues and applicable third parties for ineligibility before employment or engagement.



OUR COMMITMENT TO PATIENTS AND THE HEALTHCARE COMMUNITY

Providing Information About CorMedix Products

CorMedix is committed to ensuring that information about our products — shared with healthcare professionals, researchers, patients, and others — complies with applicable laws and regulations, is truthful, accurate, and not misleading, and is based on medically and scientifically sound evidence. We promote our products with integrity and provide information that helps the healthcare community make informed decisions about patient care. Product communications must be appropriately substantiated, present risks and benefits in a balanced manner, and be consistent with their approved product labeling. We don't promote our products for uses, patient populations, or dosages outside the FDA-approved labeling, and all promotional and product-related materials must complete the Company's required medical, legal, and regulatory review and approval before they are used or distributed. CorMedix doesn't promote its products based on reimbursement or the potential profit a customer may realize from reimbursement.

NEED MORE INFORMATION?

For more information, please review:

- [Principles Governing Promotional Practices Policy](#)



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Interactions With Healthcare Professionals and Organizations

CorMedix is committed to conducting interactions with healthcare professionals (“HCPs”) and healthcare organizations (“HCOs”) with integrity, transparency, and respect for their independent clinical judgment. These interactions are intended to support patient care and the appropriate exchange of information that can help optimize treatment decisions.

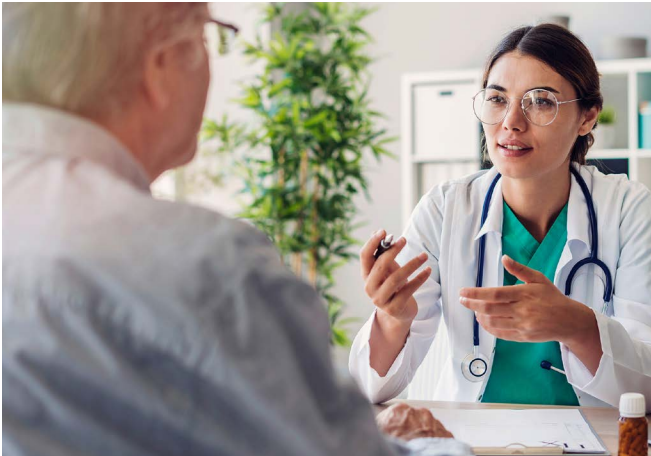
CorMedix colleagues must not provide or offer anything of value to improperly influence or reward prescribing, purchasing, recommending, or using our products. Our interactions and engagements with HCPs and HCOs must serve a legitimate business purpose, comply with applicable laws, regulations, industry standards, and Company policies and procedures, and any compensation for services must be consistent with fair market value.

CorMedix accurately discloses and reports payments and other transfers of value to healthcare professionals and healthcare organizations whenever required by applicable law.

NEED MORE INFORMATION?

For more information, please also review:

- [Interactions with HCPs and HCOs Policy](#)



Ethical Clinical Research

Clinical research is fundamental to CorMedix’s ability to develop and provide medically and scientifically sound information about our products. CorMedix is committed to conducting and supporting clinical research that adheres to high ethical standards and protects the safety, rights, and well-being of research participants.

Our commitment includes:

- Obtaining appropriate informed consent from individuals who participate in our clinical research programs.
- Conducting research in compliance with applicable laws, regulations, and ethical standards.
- Transparently disclosing our research protocols and reporting clinical trial results through appropriate public registries, regardless of outcome.
- Supporting the timely presentation and publication of clinically and scientifically important research findings.
- Disclosing funding and other support provided in connection with publications and adhering to recognized authorship and publication standards.

Patient Safety and Reporting of Adverse Events

CorMedix is committed to delivering safe and effective therapies to patients. Protecting patient safety is fundamental to our Mission and guides how we develop, manufacture, monitor, and communicate about our products.

We continuously monitor the safety profile of our products and comply with applicable laws and regulations governing the collection, evaluation, and reporting of adverse events, product complaints, and other safety-related information.

Because patient safety depends on timely reporting, every colleague has a responsibility to promptly report any adverse event, product complaint, or other safety concern involving a CorMedix product in accordance with Company policies and procedures.

NEED MORE INFORMATION?

For additional information on CorMedix’s reporting processes and related obligations, including the reporting of adverse events, product complaints, and special situations, please consult our

- [Adverse Event and Product Quality Complaint Reporting Policy](#)

Protecting the Personal Data and Information of Individuals

CorMedix is committed to protecting the privacy, security, and confidentiality of personal information entrusted to us. We collect and use personal information relating to patients, clinical trial participants, employees, healthcare professionals, customers, and others in connection with our business activities, and we have a responsibility to handle that information appropriately and in compliance with applicable laws, regulations, and Company policies.

Personal information is any information that can directly or indirectly identify an individual, including names, contact information, health information, and other sensitive personal information. CorMedix takes appropriate measures to prevent unauthorized access to, use of, or disclosure of personal information and to safeguard the information within our control.

All processing of personal information must be for legitimate business purposes and consistent with applicable legal requirements and our Privacy Policy.

If you have questions about the handling of personal information or our Privacy Policy, contact [CorMedix’s Chief Legal Officer](#).

Responsible Pricing and Access

CorMedix is committed to improving patient outcomes and supporting appropriate access to our therapies. We approach pricing, reimbursement, patient access, and support programs responsibly, ethically, and in compliance with applicable laws and regulations.

We support programs that help eligible patients access our products and are committed to complying with all legal and regulatory requirements governing pricing, reimbursement, transparency, and reporting. Our decisions and practices are guided by our commitment to patients, integrity, and responsible business conduct.



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OUR COMMITMENT AS A CORPORATE CITIZEN

Bribery and Corruption

CorMedix prohibits bribery and corruption in any form. We must never offer, provide, request, or accept anything of value to improperly influence a decision, obtain or retain business, secure an improper advantage, or reward favorable treatment. This prohibition applies whether we act directly or through a third party acting on our behalf.

Our interactions with government officials, healthcare professionals, customers, suppliers, and other business partners must always be conducted with integrity and in compliance with applicable laws, regulations, industry standards, the Code, and Company policies.

NEED MORE INFORMATION?

- For more information, please review:
- [Anti-Bribery Anti-Corruption \(ABAC\) Policy](#)

Fair Competition and Fair Dealing

CorMedix believes in fair and open competition and conducts business honestly and ethically. We comply with applicable competition and antitrust laws and don't enter into agreements or understandings that improperly restrict competition, including agreements relating to pricing, customers, territories, or other competitive activities.

We deal fairly with customers, suppliers, competitors, healthcare professionals, and other business partners. We don't obtain business through bribery, misrepresentation, misuse of confidential information, or other improper means. Statements about our products, services, or those of our competitors must be truthful, accurate, and not misleading.

We compete vigorously — but we do so with integrity and in compliance with applicable laws, regulations, industry standards, and Company policies.



Questions & Answers

A close friend works at a competitor company — can I speak with them about Company business?

Yes, with limits. You may maintain personal and professional relationships with individuals who work for competitors. However, you must protect CorMedix's confidential information and avoid discussions involving competitively sensitive topics such as pricing, customers, markets, business strategies, or other information that could raise antitrust or unfair competition concerns.

If you're ever unsure whether a conversation is appropriate, seek guidance from [Legal](#) or [Compliance](#).

Competitive Information

CorMedix gathers and uses competitive intelligence responsibly, ethically, and in compliance with applicable laws and regulations.

We respect our competitors' proprietary and confidential information and expect CorMedix colleagues to guard against receiving or using confidential information that legitimately belongs to third parties or our competitors.

Competitive intelligence must be gathered ethically and in accordance with the laws and regulations that protect competitors' proprietary information. For example, it's appropriate to collect such intelligence from public sources, including websites, advertisements, brochures, or public presentations.



Questions & Answers

I just left a competitor to join CorMedix and have confidential information from my old employer that I think would be useful to CorMedix. Can I share the information with my new team?

No. You may never use or disclose a former employer's confidential or proprietary information. CorMedix expects colleagues to compete ethically and to respect the intellectual property and confidential information of others.

If you're ever unsure whether a conversation is appropriate, seek guidance from [Legal](#) or [Compliance](#).





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Trade Controls and Financial Crimes

CorMedix is committed to conducting business with integrity and in compliance with applicable trade controls, sanctions, export controls, anti-boycott, anti-money laundering, anti-terrorism, and other financial crimes laws. These laws may restrict or prohibit certain transactions, business relationships, and the transfer of products, services, technology, or information, and they prohibit dealing in funds derived from illegal activity or intended to conceal the source, ownership, or purpose of those funds.

Colleagues involved in international business or financial activities must follow these requirements and stay alert to red flags — such as dealings with a sanctioned country, entity, or individual; export, import, or licensing triggers; unusual payment requests; transactions involving high-risk parties or jurisdictions; or arrangements that lack a legitimate business purpose.

If you're unsure whether an activity or transaction is permitted, contact [Legal](#), [Compliance](#), or [Finance](#) before proceeding.



Interactions With the Government

CorMedix is committed to conducting its business with government agencies and their representatives with integrity, transparency, and in compliance with applicable laws and regulations.

We cooperate with legitimate government and regulatory inquiries and investigations and provide truthful, accurate, and complete information in all dealings with government officials and agencies.

As part of these interactions, we must:

- Exercise care and diligence in maintaining records for and allocating costs to government contracts.
- Never offer gifts, gratuities, favors, meals, entertainment, travel, or similar benefits to government employees without prior approval from Legal.
- Ensure that all required submissions to government agencies are accurate, complete, timely, and compliant with applicable laws and regulations.



OUR COMMITMENT TO OUR COMPANY AND OUR SHAREHOLDERS

Conflicts of Interest

CorMedix is committed to making business decisions in the best interests of the Company, our patients, customers, and shareholders. We need to avoid situations where personal interests interfere — or appear to interfere — with our ability to act objectively and in the best interests of CorMedix.

A conflict of interest exists when a personal or private interest competes with, or appears to influence, our ability to exercise our professional duties objectively, effectively, or independently. Conflicts of interest can take many forms, including gifts and entertainment, outside business activities, investments, and personal relationships. A conflict doesn't need to involve a financial interest — it may include any circumstance that a reasonable person could view as influencing a decision-maker's judgment, including personal relationships. Even the appearance of a conflict can undermine trust in the Company's decisions and relationships.

- Here are some common situations that may present a conflict of interest:
- Providing services to a competitor in any capacity while employed by CorMedix.
 - Doing work for any third party (even during non-working hours) that might adversely affect your performance or judgment on the job, and using Company time, facilities, resources (including fleet cars), materials, or logos for outside employment.
 - Doing business on behalf of CorMedix with any company in which you or a close family member has an interest, or based solely on a personal relationship.
 - Maintaining personal relationships with colleagues that may bias or negatively impact how you supervise that person or others on the team.
 - Participating on a competitor company's board of directors.

It's not always easy to spot a conflict of interest — we've all been there. You're expected to exercise sound judgment guided by the principles of this Code, our Values and Behaviors, and Company policies and procedures — to act with transparency and to promptly disclose potential conflicts. When evaluating a potential conflict, you should also consider how the situation would reasonably be perceived by others. Potential conflicts should be disclosed when you join CorMedix and whenever a new potential conflict arises.

CorMedix's general approach to dealing with a potential conflict of interest is to recognize it, disclose it, and, if applicable, remove yourself from the decision-making process. If a potential conflict is identified, the Chief Legal Officer will determine whether it can be managed, whether additional approvals are required, and whether any restrictions or safeguards should be implemented before you proceed.



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Company Assets and Proprietary Information

CorMedix's duty to its shareholders includes making the best use of the Company's assets. As part of our commitment to fulfill that responsibility and drive operational excellence, all CorMedix colleagues must protect CorMedix's assets and ensure their efficient use. Theft, carelessness, and waste have a direct impact on CorMedix's profitability. CorMedix colleagues may use CorMedix assets — such as funds, products, documents, or computers — only for legitimate business purposes. CorMedix prohibits the use of Company assets for any illegal purpose or in any way that would violate the Code or CorMedix policies. All Company assets must be returned to CorMedix upon cessation of employment.

Information is one of our most valuable assets. The obligation to protect CorMedix assets includes confidential and proprietary information — any information that's not generally known to the public or that would be helpful to our competitors. Examples of confidential and proprietary information include intellectual property, business and marketing plans, sales figures and projected earnings, supplier and price lists, customer account lists, research and development information, regulatory data, launch and sales plans, and employee records. CorMedix colleagues must maintain the confidentiality of information entrusted to them by CorMedix or other companies, including customers, suppliers, business partners, healthcare professionals, and other third parties. We may use or disclose that information only for legitimate business purposes and in accordance with applicable agreements, laws, and Company policies. Unauthorized disclosure of confidential information is prohibited.

Additionally, CorMedix colleagues should take appropriate precautions to ensure that confidential or sensitive business information — whether it's proprietary to CorMedix or another company — is not communicated within CorMedix except to colleagues who need to know the information to perform their responsibilities. The obligation to

- preserve proprietary information continues even after you're no longer employed by CorMedix.
- Putting Our Code Into Practice: Protecting Company Assets and Proprietary Information**
- Protect Company assets and use them only for legitimate business purposes.
 - Don't leave confidential records or documents where others can view them.
 - Don't discuss confidential information where others may overhear you.
 - Don't share confidential or proprietary information through social media or other public forums.
 - Immediately report any potential improper action against CorMedix's property and resources so we can take appropriate action to protect the Company's interests.
 - Take appropriate precautions when working on confidential matters in public places or while traveling.



Intellectual Property Rights

CorMedix's commitment to research and development is vital to our Vision. CorMedix's intellectual property — including its patents, trademarks, copyrights, and trade secrets — is essential in maintaining our competitive advantage and our ability to advance innovation.

Colleagues are expected to establish, protect, maintain, and defend CorMedix's intellectual property rights and use those rights in a responsible way. For example, it's important that we identify and protect any new works of authorship, scientific findings, medical advances or innovative solutions to patient care, or business problems. In addition to protecting CorMedix's intellectual property, colleagues must respect the legitimate intellectual property rights of others.

Contact [Legal](#) if you suspect that a CorMedix patent, trademark, copyright, or trade secret is being infringed, or if you need advice on how to protect CorMedix's intellectual property interests.

Books and Recordkeeping

CorMedix is committed to maintaining complete, accurate, and reliable books, records, and business information. Accurate records support sound business decisions, help us meet our legal and regulatory obligations, and reinforce the trust that patients, customers, shareholders, business partners, and regulators place in us.

CorMedix also has legal obligations to disclose and report arrangements with healthcare professionals, including transparency reporting of transfers and items of value.

All colleagues are responsible for ensuring that information they create, maintain, approve, or submit on behalf of CorMedix is accurate, complete, timely, and not misleading. We must never make false entries, intentionally omit relevant information, misclassify transactions, or otherwise misrepresent Company activities or performance.

CorMedix's books and records, including its financial statements, must accurately reflect Company transactions and comply with applicable laws, regulations, accounting standards, and internal controls. All transactions must be supported by appropriate documentation and recorded in the proper account and accounting period.

Our commitment to integrity extends to all of our business records and communications. Emails, presentations, reports, notes, text messages, and other business communications may become public through legal, regulatory, or investigative processes. We should ensure our communications are accurate, professional, and provide appropriate context. We should avoid exaggeration, unfounded statements, derogatory remarks, legal conclusions, or inappropriate characterizations of individuals or organizations.

NEED MORE INFORMATION?

For more information, please also review:

- [Travel and Expense Reimbursement Policy](#)



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Document Retention

CorMedix has adopted record retention and disposal procedures to ensure that our records are maintained, stored, and — when appropriate — destroyed in accordance with applicable legal, regulatory, and financial requirements. Additionally, if there's ever an investigation or litigation involving the Company or its employees, we must ensure that we preserve all relevant records, including documents and electronically stored information. Follow any relevant instructions you receive in that regard. If you have any questions about our record retention and disposal procedures, or your obligations, contact [Legal](#).

Insider Trading

CorMedix is committed to maintaining the trust of our shareholders and the integrity of the financial markets. In the course of our work, we may learn material non-public information (“MNPI”) about CorMedix or another company that’s not available to the public.

We must never buy or sell securities while in possession of MNPI, or disclose that information to others so they can trade. This prohibition applies to information relating to CorMedix as well as other companies, including business partners, customers, suppliers, or companies involved in potential transactions with CorMedix.

Information is generally considered material if a reasonable investor would view it as important when deciding whether to buy, sell, or hold a security.

If you have questions about insider trading or whether information may be material non-public information, contact CorMedix’s [Chief Legal Officer](#) before taking any action.

NEED MORE INFORMATION?

For more information, please also review:

- [Insider Trading Policy and Guidelines with Respect to Certain Transactions in Company Securities](#)

Putting Our Code Into Practice: Identifying Material Non-Public Information

The following are examples of information you may learn about a public company’s business that would qualify as material inside information:

- Material regulatory filings.
- Results from a clinical trial.
- Approval or regulatory action relating to a product in development.
- Earnings statements and forecasts.
- Potential mergers, acquisitions, and joint ventures.
- Major developments in litigations.
- Information you obtained confidentially during the course of your work, including any due diligence.



Fraud, Waste, and Abuse

CorMedix is committed to the integrity of the healthcare system and to detecting, correcting, and preventing false claims. As part of this commitment, we expect our colleagues to be able to recognize and report instances of fraud, waste, and abuse.

Each of us has a responsibility to ensure that payments, transactions, records, reports, and other business activities are properly authorized, accurately documented, and conducted in compliance with applicable laws and CorMedix policies and procedures.



Information Technology and Security

Putting Our Code Into Practice: IT Security

- Use CorMedix-approved systems, software, and emails responsibly and only for legitimate business purposes; do not install or use unapproved software, tools, browser extensions, or technology services on Company systems or devices.
- Use caution with external emails and suspicious links, and promptly report suspected phishing, compromised credentials, malware, unauthorized access, or other security or privacy incidents to [IT](#).
- Protect our systems, information, accounts, IDs, passwords, and access cards; access only systems, files and accounts you are authorized to use.
- Never use another person’s account or credentials, bypass access or security restrictions, or improperly access or share copyrighted or licensed materials through CorMedix systems.
- Never disseminate through, or download onto, CorMedix’s computer systems or emails information that is offensive, defamatory, derogatory, harassing, obscene, or otherwise vulgar.
- Use the same professional care in composing all emails, text messages, and instant messages as you would in any other written correspondence.
- Don’t forward chain emails, third-party advertisements, or solicitations on CorMedix systems unless otherwise authorized.



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Artificial Intelligence

CorMedix is committed to using artificial intelligence (“AI”) and other emerging technologies responsibly, ethically, and in a manner consistent with our Mission, Values and Behaviors, and legal and regulatory obligations. When used appropriately, AI can support innovation, efficiency, and informed decision-making across our business.

Colleagues may use only Company-approved AI tools and must protect confidential, proprietary, personal, patient, healthcare professional, and other sensitive information when using those tools. Information entered into AI systems must comply with Company policies and applicable legal and regulatory requirements.

AI-generated content must be reviewed carefully for accuracy, completeness, confidentiality, bias, and appropriateness before it is used, shared, or relied upon. The use of AI doesn’t replace professional judgment or eliminate the need to comply with applicable laws, regulations, Company policies and procedures, or required review and approval processes.

If you’re ever unsure whether an AI tool or proposed use is appropriate, seek guidance from [IT](#), [Legal](#), [Compliance](#), or your manager before proceeding.

Putting Our Code Into Practice: Responsible Use of AI

Before using AI, ask yourself:

- Is this tool approved for Company use?
- Am I protecting confidential, proprietary, personal, patient, healthcare professional, and other sensitive information?
- Have I reviewed the output for accuracy, completeness, context, and potential bias?
- Could this output be misleading, inappropriate, or inconsistent with Company policies if shared or relied upon?

- Does this use of AI bypass any required legal, regulatory, privacy, medical, compliance, or promotional review process?

When in doubt, pause and seek guidance from [Legal](#) or [IT](#) before using, sharing, or relying on AI-generated content.

Social Media

CorMedix is committed to using social media responsibly, transparently, and in a way that reflects our Values and Behaviors. Social media can help us share information, build relationships, and participate in important conversations about healthcare, our products, and our Mission. At the same time, social media communications can create legal, regulatory, confidentiality, promotional, and reputational risks if not handled appropriately.

Only authorized colleagues may speak for CorMedix or post, respond, or comment about Company business, our products, or other regulated matters on the Company’s behalf. Unless you’re specifically authorized, don’t state or imply that you represent CorMedix or are speaking for it.

When using social media in a personal capacity, colleagues should use good judgment, be respectful and professional, protect confidential and proprietary information, and avoid creating the impression that their personal views or comments are made on behalf of CorMedix.

NEED MORE INFORMATION?

For more information, please review:

- [AI Acceptable Use Policy](#)
- [Social Media Policy](#)



Questions & Answers

Am I permitted to share the information posted on CorMedix’s social media accounts?

You may repost, like, share, or otherwise engage with content from an official CorMedix social media account, provided that the post does not relate to an unapproved product or use, and you do not add, modify, or supplement the content with your own comments.

Even when we engage with social media in a personal capacity, we shouldn’t represent CorMedix and should take care not to create the impression that we’re communicating on behalf of the Company. You should always be fair and courteous to others, including customers, suppliers, and fellow colleagues, and maintain appropriate discretion and good judgment. For additional guidance on using social media, please refer to our [Social Media Policy](#).

I follow the social media accounts of healthcare professionals who sometimes post their opinions about our products. Can I repost their content if it relates to one of our products? If an HCP posts misinformation about our products, can I comment to correct it?

No. Unless you’re specifically authorized to do so, you may not repost, share, comment on, or respond to third-party social media content about CorMedix products. These activities may be viewed as product promotion or Company communications and must comply with applicable laws, regulations, and CorMedix policies. Only authorized CorMedix colleagues may post or correct information about CorMedix or our products on social media.

Business Continuity

CorMedix is committed to being prepared so we can keep serving patients and operating responsibly during an emergency or disruption — whether technological, natural, or man-made. Each of us plays a part: stay alert and adaptable, follow our emergency and business continuity plans, stay in touch through designated channels, and be ready to work remotely if needed. By supporting these plans, we help CorMedix respond safely and keep operating when the unexpected happens.





OUR COMMITMENT TO OUR COMMUNITY

The Environment

CorMedix is committed to running our business in an environmentally responsible way. We work to reduce the impact of our operations, products, and services on the environment, and we meet the environmental laws and standards that apply to us.

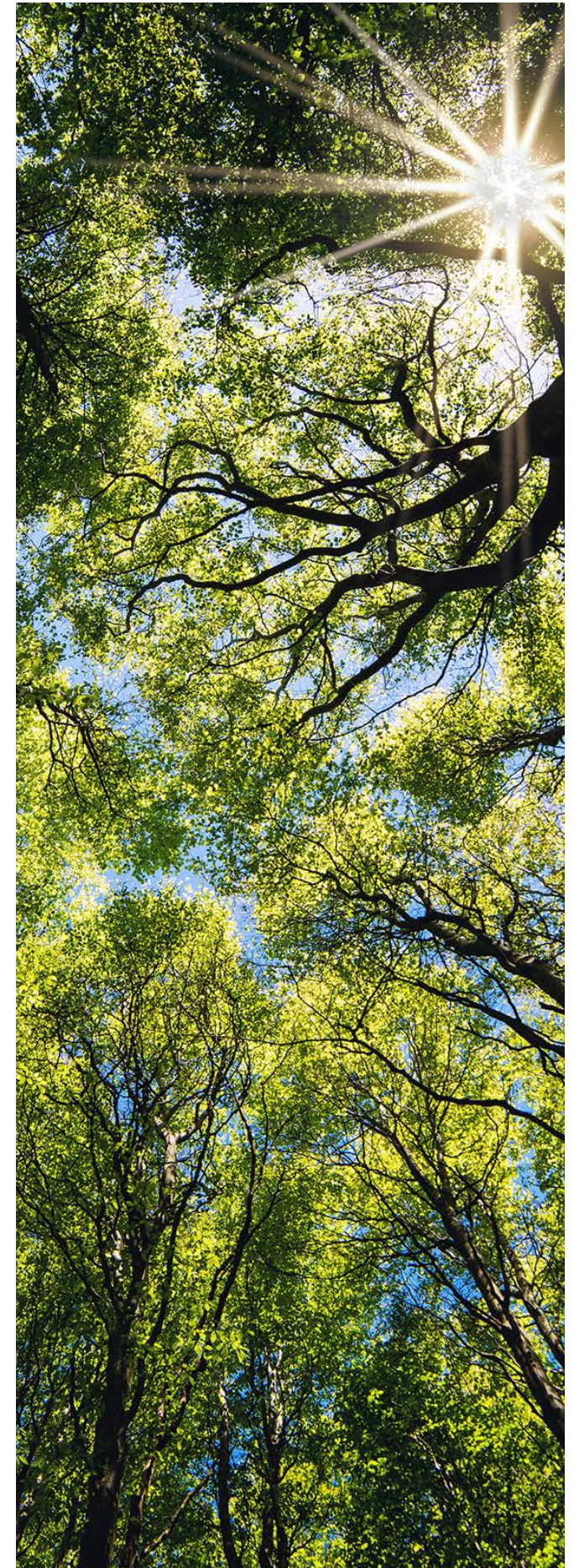
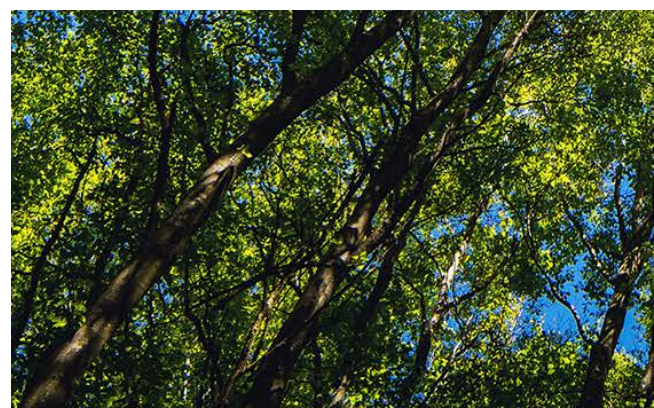
Compliance With Combating Trafficking in Persons Laws

CorMedix is committed to treating people with dignity and doing our part to prevent human trafficking. We don't tolerate human trafficking, sex trafficking, or forced or involuntary labor in any form — in our own operations or by the vendors, suppliers, and partners we work with. We expect everyone acting on CorMedix's behalf to avoid any involvement in trafficking or slavery.

In performing U.S. Government contracts and subcontracts, we comply with the Government's Combating Trafficking in Persons policy (FAR 52.222-50). For the specific prohibited activities and how to report concerns, see CorMedix's [Combating Trafficking in Persons Policy](#).

Animal Welfare and the Ethical Use of Animals in Research

CorMedix recognizes the important role of animal research in developing safe, effective therapies and undertakes it only where scientifically necessary, treating every animal humanely and with respect. CorMedix will comply with all applicable laws and ethical guidelines governing the conduct of animal studies and will take due measures to prevent or minimize pain and distress before, during, and after experimental procedures. Suspected mistreatment or non-compliance must be reported through CorMedix's reporting channels; we prohibit retaliation against those who raise concerns in good faith.



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Charitable Contributions and Volunteer Support

CorMedix is committed to acting responsibly and supporting efforts that are consistent with our Mission, our Values and Behaviors, and applicable legal and regulatory requirements. This may include appropriate charitable contributions, grants, product donations, patient support programs, and other initiatives that help eligible patients access our products or support organizations aligned with our Mission.

CorMedix also supports colleagues who choose to give back through volunteer work, including through dedicated volunteer paid time off. Any charitable contribution, grant, donation, patient support activity, or volunteer-related program must comply with applicable laws, regulations, and Company policies and must not be used to improperly influence business decisions or healthcare decisions.

If you're ever unsure whether a proposed contribution, donation, grant, or volunteer activity is appropriate, seek guidance from [Legal](#) or [Compliance](#) before proceeding.



Media Inquiries and Speaking on Behalf of CorMedix

What we share publicly must be accurate, consistent, and timely. To make that happen, our communications with the media and the public are coordinated and aligned with Company policies.

As with our social media platforms, only those colleagues authorized to speak on behalf of CorMedix may make any statement to the media about the Company's business or respond to inquiries from the media or other external community members. You should direct inquiries from the external community to a member of the ELT. Similarly, any inquiries regarding legal issues or pending lawsuits or investigations must be directed to the [Chief Legal Officer](#).



Questions & Answers

I recently received a request for information about CorMedix from an external organization. How should I handle the request?

CorMedix colleagues (other than CorMedix's authorized spokespersons) must not discuss internal Company matters with, or disseminate internal Company information to, anyone outside CorMedix, except as required in the performance of their Company duties and only after an appropriate confidentiality agreement is in place or pursuant to the guidance of CorMedix's Chief Legal Officer. This prohibition applies particularly to inquiries concerning CorMedix from the media.



Public Policy and Political Activities

CorMedix respects and supports the right of our colleagues to participate individually in the political process. Federal and state lobbying laws, however, regulate CorMedix's ability to support political candidates and engage in political activities.

Engagement in political activities must be in your individual capacity and not on behalf of CorMedix. You may not conduct personal political activities on CorMedix time or use CorMedix's resources, such as personnel, telephones, computers, or supplies. Colleagues won't be reimbursed for personal political contributions. No colleague may make or commit to political contributions on behalf of CorMedix without the approval of CorMedix's [Chief Legal Officer](#).

CorMedix may, from time to time, express the Company's views on national and local issues that affect our business and the healthcare industry. In such cases, CorMedix funds and resources may be used, but only when permitted by law. CorMedix may also make limited contributions to political parties or candidates in jurisdictions where it is legal and customary to do so. CorMedix may pay related administrative and solicitation costs for political action committees formed in accordance with applicable laws and regulations.



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Waivers of the Code

Unless you are an executive officer or director, if you believe a waiver to any of the principles set forth in this Code may be appropriate, consult the [Chief Legal Officer](#). The Chief Legal Officer is responsible for maintaining a record of all waiver requests and their disposition.

Any executive officer or director who seeks a waiver of the Code should contact the [Chief Executive Officer](#) or [Chief Legal Officer](#). Approval by the Board of Directors is required for any waiver of the Code for an executive officer or director and will be disclosed to the extent required by law or regulation.

Dissemination and Amendment of the Code

We provide the Code to all colleagues when they join CorMedix or begin another relationship with the Company. Each year, colleagues also confirm that they've received, read, and understood the Code and agree to follow it.

CorMedix may amend or replace the Code at any time. The most current version is available on our corporate website and intranet. The Board of Directors must approve any material change to the Code.

This document is not an employment contract between CorMedix and any of its employees, officers, directors, or contractors.





HELPFUL RESOURCES

Do you need additional guidance? CorMedix has a variety of resources to contact for help.

Issue or Concern	Contact
To ask questions, report potential misconduct, or ethical concerns	Your manager (or any manager) Compliance Department Legal Department Human Resources Ethics & Compliance Helpline, accessible 24/7 at cormedix.ethicspoint.com For alternative reporting avenues, see Reporting Concerns section on Page 6
For legal and compliance questions	Legal Department Compliance Department
For medical inquiries or adverse event and product quality reporting	(844) 424-6345 medinfo@cormedix.com
Privacy / personal information questions	Chief Legal Officer / Legal Department
To report information security incidents	Contact the IT Helpdesk or a member of the IT Department
HR / employee concerns	Contact Human Resources, your Human Resources Business Partner, a Manager, or our Ethics & Compliance / Speak Up Helpline
For investor and media inquiries	See the Contact Us page at www.cormedix.com



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