



Code of Conduct

STATEMENT OF EXPECTATION

I2Pure believes strongly in the value of a safe and productive workplace. We carry high standards of professionalism and want to be clear about our expectations of behavior and conduct for anyone who works in or with our Company.

This Code of Conduct applies to all employees, contractors, consultants, visitors, or anyone engaged in business activity with I2Pure. Violations of this Code of Conduct may result in disciplinary action, up to and including termination of contract or employment.

WORKPLACE CONDUCT

I2Pure endeavors to maintain a positive and productive work environment. Everyone present in our workplace plays a role in meeting that standard. Personnel present in the workplace must abide by certain rules of conduct, based on respect to one another.

The following are examples of some, but not all, conduct which is considered unacceptable:

- Obtaining employment or an engagement on the basis of false or misleading information.
- Stealing, removing, or defacing I2Pure property or another person's property.
- Unauthorized use or disclosure of confidential information.
- Improper interaction with other employees, vendors, customers, or other workplace participants, including violations of the Company's EEO policy, bullying, or other unprofessional behavior.
- Fighting, threatening, or disrupting the workplace, or any other act of aggression or violence.
- Failure to follow lawful instructions of a Company representative or the terms of an engagement.
- Seeking personal favors, economic advances or benefits, or competitive advantages in the course of business with the Company.
- Illegal or unethical accounting, billing, or business practices.
- Illegal or improper acts performed in connection with work for I2Pure, including any breach of duties owed to the public, shareholders, employees, or the owners of I2Pure.
- Any other violation of applicable law or I2Pure policy.

If you experience or witness a violation of applicable law or this Code of Conduct, we expect you to report it immediately to an appropriate Company representative, such as the Company HR Dept, CEO, or your primary business contact.

I2Pure strictly prohibits retaliation against anyone who reports a concern in good faith.

Drug-Free and Alcohol-Free Workplace

To help ensure a safe, healthy, and productive work environment for our employees and others, to protect I2Pure property, and to ensure efficient operations, the sale, use, manufacture, distribution, dispensation, consumption, purchase or possession of illegal or mind-altering drugs, whether or not under prescription, the unauthorized use of prescription drugs, is prohibited on Company property or at any time during which the employee is on Company business. Alcohol may not be consumed in any quantity on company property or during work hours without the express approval of the CEO. No employee shall report to work or represent the Company while under the influence of alcohol, illegal drugs or any other substance which may affect the ability of the employee to safely perform job duties,

even if such influence is the result of consumption while off duty. An employee may report to work and remain on duty when using a prescribed substance administered by or under the instructions of a licensed healthcare provider who has advised the employee that the substance will not affect the employee's ability to safely perform his or her job duties. Employees taking over-the-counter or prescription medications will be held responsible for knowing the effects of these drugs and whether they could impair their ability to safely perform their job duties. These employees will be responsible for not working when under the influence of over-the-counter or prescription medications that might impair their ability to perform their job duties safely. Employees who engage in activities in violation of this policy will be subject to discipline up to and including discharge.

In addition to drug and alcohol testing prior to employment, arising from a work-related accident/near miss, or based upon reasonable suspicion, the Company reserves the right to conduct random drug or alcohol testing.

Any prospective employee who tests positive for alcohol or drugs, refuses to sign the necessary consent or release forms to authorize the test, or who refuses to provide a specimen in a timely manner or provides an adulterated or insufficient specimen for testing, shall be deemed to have withdrawn his or her application for employment and will not be employed by the Company.

If an employee refuses to consent to or cooperate with testing procedures, refuses to provide a specimen in a timely manner, provides an adulterated or insufficient specimen, or tests positive for alcohol or drugs, he or she will be subject to discipline, up to and including termination.

If the Company has any reason to believe that an employee has brought, used or manufactured controlled substances or drug paraphernalia onto its property, it may search the employee's personal belongings and workstation. Employees should have no expectation of privacy in these areas. All such items will be confiscated and turned over to the appropriate law enforcement authorities.

ANTITRUST COMPLIANCE

I2Pure is committed to full compliance with all applicable antitrust and competition laws, including the Sherman Act, the Clayton Act, and applicable state and foreign equivalents. These laws preserve free and open competition in the marketplace. Violations can result in severe civil and criminal penalties for both the Company and individuals.

Prohibited Conduct

No employee may engage in, discuss, or agree with competitors regarding any of the following:

- Prices, discounts, or pricing policies.
- Allocation of customers, territories, or markets.
- Bids or bid strategies.
- Production levels or capacity.
- Distribution methods or channels.

Even informal discussions with competitors on these topics — at trade conferences, industry meetings, or social settings — can constitute an antitrust violation. Employees must also avoid any arrangement constituting price-fixing or market allocation, tying or exclusive dealing arrangements that unreasonably restrain trade, and predatory pricing designed to eliminate competition.

Compliance Obligations

Anyone who believes a proposed action may raise antitrust concerns must consult with the CEO before proceeding. If you receive a communication from a competitor that touches on any of the above subjects, disengage immediately and report the contact to the CEO. Violations of this policy may result in termination of employment, as well as personal civil or criminal liability.

FOREIGN CORRUPT PRACTICES ACT (FCPA) COMPLIANCE

I2Pure conducts all business in accordance with the U.S. Foreign Corrupt Practices Act (FCPA) and all applicable anti-bribery and anti-corruption laws worldwide. The FCPA prohibits offering, promising, authorizing, or paying anything of value — directly or indirectly — to any foreign government official, political party, party official, or candidate for political office in order to obtain or retain business or to secure any improper advantage.

Prohibited Payments

No employee may offer, give, or authorize the giving of money or anything of value to:

- Any foreign or domestic government official,
- Any foreign political party, party official, or candidate for office, or
- Any third party, knowing that the payment will be passed on to a foreign government official,

for the purpose of influencing any official act or decision, or to induce the use of that official's influence to benefit I2Pure. This prohibition extends to indirect payments made through agents, consultants, distributors, joint venture partners, or other intermediaries. Prior written approval from the CEO is required before making any payment or providing any gift to a foreign government official.

Recordkeeping

All transactions must be accurately recorded in I2Pure's books and records. No false, misleading, or incomplete entries may be made for any reason.

Reporting

Any employee who is aware of or suspects a violation of this policy must immediately report it to the CEO. I2Pure prohibits retaliation against anyone who reports a suspected violation in good faith. Violations may result in termination of employment as well as personal civil and criminal liability under U.S. and foreign law.

FDA AND REGULATORY COMPLIANCE

I2Pure's products are subject to regulation by the U.S. Food and Drug Administration (FDA) and other regulatory bodies, such as the Environmental Protection Agency (EPA) and Drug Enforcement Agency (DEA). The Company has a fundamental obligation to comply with all applicable laws and regulations governing the development, manufacture, labeling, marketing, and distribution of its products. All employees must understand and adhere to the regulatory requirements applicable to their roles.

General Obligations

Employees must:

- Ensure that their activities comply with applicable FDA or EPA regulations and other applicable law.
- Maintain accurate and complete records as required by law and Company policy.

- Never make false, fraudulent, or misleading statements in any regulatory submission, communication, or record.
- Promptly report any potential regulatory violations to their manager or the CEO.

Customer Complaints

Employees who receive a complaint about an I2Pure product — related to quality, safety, performance, or labeling — must immediately report it to their supervisor and the appropriate quality or regulatory affairs personnel. All complaints must be documented, investigated promptly, and resolved in compliance with applicable regulatory requirements and Company procedures. Complaints indicating a potential safety issue or reportable adverse event must be escalated to the CEO without delay. Any patient, customer, or other personally identifiable information received in connection with a complaint must be treated as confidential and accessed, used, or disclosed only by personnel with a legitimate business need related to evaluating, investigating, processing, or resolving the complaint.

Knowledge of Imminent Product Risks

If an employee becomes aware of information suggesting that an I2Pure product may pose an imminent risk to consumer safety or public health, that individual must immediately report the information to their manager, designated quality leadership and the CEO. I2Pure is committed to taking prompt corrective action in such circumstances, including reporting to the FDA or other regulatory authorities where required. No employee may withhold, conceal, or delay reporting information about potential product safety risks. Retaliation against anyone who reports such a concern in good faith is strictly prohibited.

Product Recalls

In the event that I2Pure determines — or is directed by a regulatory authority — that a product recall, market withdrawal, or correction is necessary, I2Pure will act promptly and in full compliance with applicable regulatory requirements. All employees must cooperate fully with any recall effort and must immediately notify the CEO and designated quality leadership personnel if they become aware of information that may necessitate a recall.

I2Pure's approach to any recall is governed by the following principles:

- Consumer safety is the paramount consideration.
- All required notifications to regulatory authorities will be made promptly.
- Accurate records of the recall will be maintained throughout.
- The root cause will be investigated and corrective actions implemented to prevent recurrence.

Violation of FDA or other regulatory requirements — whether through action or inaction — can expose both the Company and employees to significant civil and criminal penalties, including debarment from working with the FDA. Violations of this policy may result in disciplinary action up to and including termination. Questions about FDA or regulatory compliance should be directed to the CEO or designated quality leadership / regulatory affairs personnel.

HEALTHCARE COMPLIANCE: ANTI-KICKBACK STATUTE AND SUNSHINE ACT

I2Pure is committed to full compliance with all applicable federal and state laws governing interactions with healthcare professionals, institutions, and government-funded programs. All employees are required to familiarize themselves with, and strictly adhere to, the federal **Anti-Kickback Statute** (42 U.S.C. § 1320a-7b(b)) and the **Physician Payments Sunshine Act** (42 U.S.C. § 1320a-7h), as well as any applicable state equivalents.

The Anti-Kickback Statute prohibits offering, paying, soliciting, or receiving anything of value — directly or indirectly — to induce or reward referrals or purchases covered by federal healthcare programs, including Medicare and Medicaid. No I2Pure employee may offer gifts, meals, entertainment, travel, or any other benefit to healthcare professionals or their staff in a manner that could be construed as an inducement to recommend, prescribe, purchase, or use I2Pure products.

The Sunshine Act requires that applicable manufacturers of medical devices, drugs, biologicals, and medical supplies report to the Centers for Medicare & Medicaid Services (CMS) all transfers of value made to physicians, teaching hospitals, and other covered recipients. I2Pure will maintain accurate records of all such transfers and ensure timely and complete reporting in accordance with CMS Open Payments requirements. All employees involved in activities that may give rise to reportable payments must promptly and accurately disclose such interactions to I2Pure's designated compliance contact.

Ignorance of these laws is not a defense, and failure to comply may expose both the individual and I2Pure to significant civil and criminal penalties, exclusion from federal healthcare programs, and reputational harm. Any employee who becomes aware of a potential violation of these requirements is obligated to report it immediately through I2Pure's compliance reporting process. I2Pure strictly prohibits retaliation against anyone who reports a concern in good faith.

Photos and Recording

I2Pure does not permit taking photographs or videos of Company employees or visitors, workplaces, presentations, product designs, product prototypes, equipment, or other tangible sites or items associated with Company business without the express written authorization of the CEO. I2Pure likewise does not permit, and expressly declines to grant permission, for the audio or digital recording of any company meetings, presentations, or conversations without the express written authorization of the CEO.

CONFIDENTIALITY, TECHNOLOGY AND EQUIPMENT

Confidentiality

All employees and contractors have a duty to protect and preserve the confidentiality of the Company's Confidential Information. It is expected that all personnel who work within the company are expected to take all reasonable steps to protect the confidentiality of all Confidential Information and Trade Secrets and to avoid inadvertent or unauthorized disclosures.

No information may be stored outside of the Company (either in written or electronic form) if the information pertains to the Company's business or the business of its customers which is not part of the public domain. No information regarding the terms and conditions of contracts with or proposals to customers, the purchase or selling prices of the Company's services or products, or proprietary information regarding the Company's operations shall be given to anyone unless the information has been properly released by the Company or is expressly authorized by the CEO nor shall it be used for any purpose other than to benefit the Company. Discussion of the Company's "Confidential Information" with individuals other than authorized personnel is not permitted.

The Company's "Confidential Information" is that information that is not generally available to the public by lawful means, as well as that information that has been entrusted to the Company with an expectation or a requirement that the information be treated as confidential. The following information is considered the Company's Confidential Information: proprietary information regarding the Company's services and products; processes; client lists (including contact information); client data; prices paid and the terms of contracts between the Company and any of its vendors or clients; internal reports and reports provided by third parties regarding the Company's operations; the Company's marketing and

sales data and plans; information regarding ideas, strategies or plans for business or product development (including technical data, sketches, designs, plans, drawings, experimental work, proposals and developments); information about the Company's pricing, costs or profitability; information about the Company's financial condition, financial statements, profit and loss statements, financial or accounting reports, budgets or internal accounting analyses; information regarding the Company's computer system, database or programs; private medical information, bank account information and/or the Social Security numbers of other employees; and the Company's Trade Secrets. "Trade Secrets" means information that is not available to the public through lawful means that has value to the Company in not being known regarding the Company's internal systems, methods of operation, processes, know-how, research, technology, development and/or compiled information of the same.

Upon request, or upon separation, all documents containing Confidential Information or Trade Secrets, and any copies thereof in whatever form, must be returned to the Company immediately.

Any disclosure, copying or removal of Confidential Information or Trade Secrets for any purpose other than a lawful one in the performance of duties in furtherance of Company business is prohibited. A violation of this policy may be grounds for disciplinary action, including immediate termination. The Company also reserves the right to take appropriate legal action against individuals who violate this policy.

Notwithstanding any other provision of this policy, nothing herein requires engaging in any illegal action, nor does it prevent engaging in actions protected by law, such as reporting to appropriate regulatory and enforcement agencies acts or omissions that are genuinely believed to be unlawful or for non-supervisory personnel to discuss the terms and conditions of their employment.

Data Security

All employees and contractors, when applicable, are required to complete the company's annual cybersecurity training program and to implement the practices and protocols covered therein. Completion of training does not fulfill the obligation alone — it is expected to apply these practices consistently throughout the year.

- Use strong, unique passwords and enable multi-factor authentication on all accounts.
- Do not share login credentials with anyone.
- Use the company VPN when accessing systems remotely.
- Report any suspected data breach or security incident to IT immediately.

[Remainder of page intentionally left blank. Signature page follows.]