tenpoint THERAPEUTICS

Code of Conduct

2026

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A Message from Henric Bjarke

DEAR COLLEAGUES,

I am pleased to announce our first Tenpoint Therapeutics Code of Conduct which is effective May 1, 2026. We are committed to doing the right thing and everyone has the responsibility to act with integrity and compliance in all of our business practices.

Our Code of Conduct sets expectations for everyone who conducts business on behalf of Tenpoint Therapeutics and describes how we interact with our colleagues, customers, vendors, and patients. Our actions define who we are as a company, and the Code of Conduct is our foundation for getting it right.

Take your time to familiarize yourself with the **Tenpoint Therapeutics Code of Conduct** and supporting policies and procedures.

> **Living our values every day is how we continue** to build and protect our reputation and safeguard our future.

REGARDS,

Henric

Introduction

The Code of Conduct

Tenpoint's Code of Conduct ("the Code") establishes the Company's overarching ethics and compliance standards. This Code applies to all employees and, where applicable, contractors, consultants, agents, and other third parties acting on behalf of Tenpoint. By adhering to the standards described in this Code, we enable Tenpoint to operate with integrity, transparency, and accountability in all aspects of our business. For the purpose of this Code, "Partners" include contractors, consultants and vendors that perform services on behalf of Tenpoint.

THE MAIN PROVISIONS OF THE CODE ARE:

- All individuals covered by this Code are responsible for always demonstrating honesty, integrity, and respect in their work activities, complying with applicable laws and regulations, and adhering to Company policies and procedures, including this Code of Conduct.
- Managers and leaders are accountable for fostering a culture of compliance, modeling ethical conduct, and addressing concerns promptly and appropriately within their areas of responsibility.
- Tenpoint is committed to fostering a culture in which individuals feel empowered to raise concerns regarding legal compliance, Company policy, or ethical conduct without fear of retaliation.
- Employees who learn of or suspect a legal, ethical, or policy violation are required to report it promptly to their supervisor, Human Resources, Compliance or anonymously at **Tenpointtx.ethicspoint.com, Tenpointtxmobile.ethicspoint.com or 833-940-1073**.
- Tenpoint strictly prohibits retaliation against anyone who, in good faith, raises issues, concerns, or allegations of compliance violations or unethical conduct.
- Tenpoint will review and address allegations of misconduct in accordance with applicable Company policies and law. Violations of this Code may result in disciplinary and corrective action, up to and including termination of employment,

> **While covering a wide range of business practices and procedures, this Code cannot and does not cover every issue that may arise, or every situation where decisions must be made; rather, it sets forth key guiding principles that represent Company policies and established conditions for continued employment.**

HOW SHOULD I USE THE CODE?

All individuals covered by this Code are expected to exercise sound judgment and act in accordance with both the letter and the spirit of applicable laws, regulations, and Company policies. While not every situation can be anticipated, this Code provides guiding principles to support ethical decision-making in situations that may present questions or require difficult judgment.

> **If you are unsure about the appropriate course of action, you are expected to seek guidance before acting.**

Relationship to Other Policies

For employees, the Employee Handbook governs all employment-related policies, procedures, rights, and obligations. The Ethics Hotline referenced in this Code is also described in the Employee Handbook and serves as a reporting channel for employees.

*Nothing in this Code alters the at-will employment relationship set forth in the **Employee Handbook**.*

Nothing in this Code is intended to interfere with rights protected under applicable federal, state, or local law.

Our Mission, Vision & Core Values

The Code of Conduct

At Tenpoint, our Mission, Vision and Values are more than words – they are the foundation of how we work, who we are and where we are going. They guide our decisions, inspire innovation and connect us as a team.

Mission — We are rejuvenating vision for the aging eye. By understanding real-world needs and partnering with eye care professionals, we are setting a new standard for presbyopia care.

Vision — We envision a world where everyone enjoys a lifetime of clear vision. At Tenpoint Therapeutics, we see things differently. We are addressing the most pressing challenges in major ophthalmic conditions with the highest unmet needs and greatest global market potential.

Values — The heart of Tenpoint is our values. They reflect the spirit we bring to our work, how we show up for each other, and the impact we strive to have on the world.

We are defined by boldness and fueled by purpose.

Principled: We do what's right, not what's easy

Courageous: We speak up, take risks and own our voice

Inventive: We imagine freely and shape the future

Driven: We move with grit, urgency, and clarity

We show up with integrity and deliver with intention.

Accountable: We own outcomes and earn trust

Collaborative: We share, support each other, and succeed together

Empowered: We act with confidence

Consistent: We lead with integrity – always

We elevate our people, our standards, and our impact.

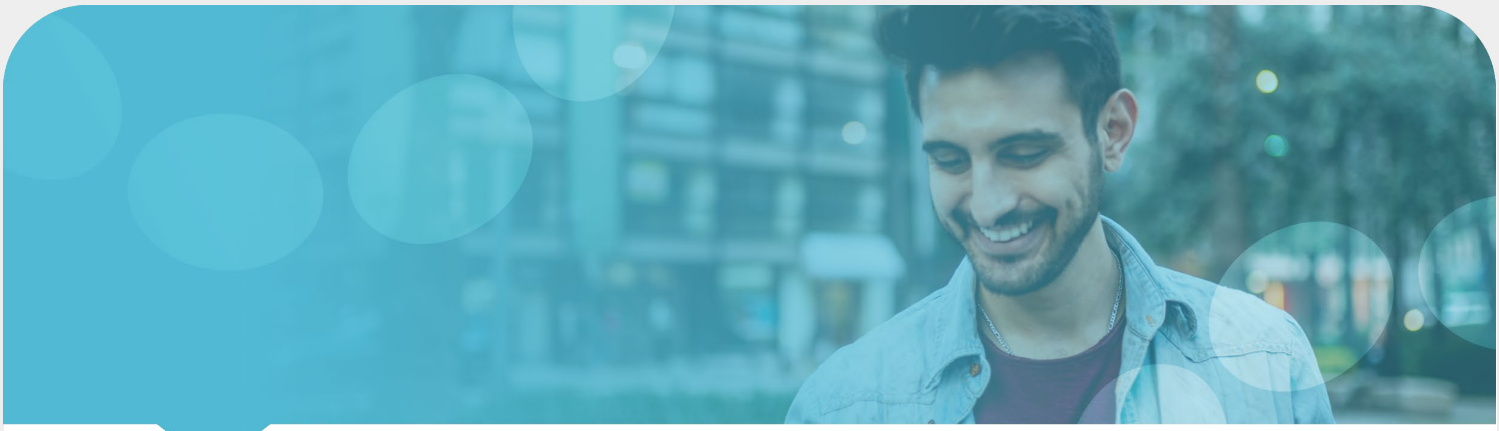
Inclusive: We foster belonging and remove barriers

Exceptional: We aim higher and deliver more

Diverse: We embrace differences to strengthen our mission

People-First: We invest in our people and thrive together

Together, these commitments define Tenpoint. They are the lens through which we view our work and the light that guides us forward.



Our Commitment to Employees

Diversity, Equity & Inclusion

At Tenpoint, we believe that diversity strengthens our ability to innovate, solve complex challenges, and improve outcomes for patients. We value a wide range of perspectives, experiences, identities, and backgrounds, and we seek to create a culture where every individual feels respected, included, and empowered to contribute their best work.

WHAT IS EQUITY?

Ensuring fair treatment, access, and opportunity for all – is foundational to how we build teams, make decisions, and develop leaders. Inclusion – fostering a sense of belonging where individuals feel safe to express ideas and be their authentic selves – is integral to our teamwork and to achieving excellence.

> **We are committed to fostering an environment that embraces differences, supports growth and recognizes the unique contributions of every person**

Equal Opportunity Employer

Tenpoint is committed to providing equal employment opportunity and maintaining a workplace free from unlawful discrimination.

Discrimination based on race, color, religion, national origin, sex (including pregnancy, sexual orientation, gender identity, and gender expression), age, disability, genetic information, veteran status, or any other characteristic protected by applicable federal, state, or local law is prohibited.

Employment decisions – including recruitment, hiring, compensation, promotion, development, performance evaluation, and separation – are based on qualifications, performance, business needs, and applicable law.

*For employees, detailed equal employment opportunity policies and procedures are set forth in the **Employee Handbook**.*

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WHAT BEHAVIORS MIGHT BE CONSIDERED HARASSMENT?

Harassment may take many forms and includes unwelcome conduct that creates an intimidating, hostile, or offensive environment or unreasonably interferes with an individual's work performance.

Examples of conduct that may be considered harassment include:

- Offensive or derogatory comments, jokes, or slurs
- Unwelcome advances or requests for favors
- Inappropriate physical contact
- Displaying offensive or inappropriate materials
- Threatening, intimidating, or humiliating behavior
- Repeated unwelcome communications

This list is illustrative and not exhaustive.

*For employees, detailed definitions and standards regarding unlawful harassment are set forth in the **Employee Handbook**.*

Protection Against Retaliation

Tenpoint strictly prohibits retaliation against any individual who, in good faith, raises a concern, reports suspected misconduct, seeks guidance, or participates in an investigation or review process.

Retaliation is inconsistent with our values and undermines our commitment to ethical conduct. Individuals who engage in retaliatory behavior may be subject to corrective or disciplinary action, up to and including termination of employment or, where applicable, termination of contractual relationships.

*For employees, retaliation-related definitions and procedures are governed by the **Employee Handbook**.*

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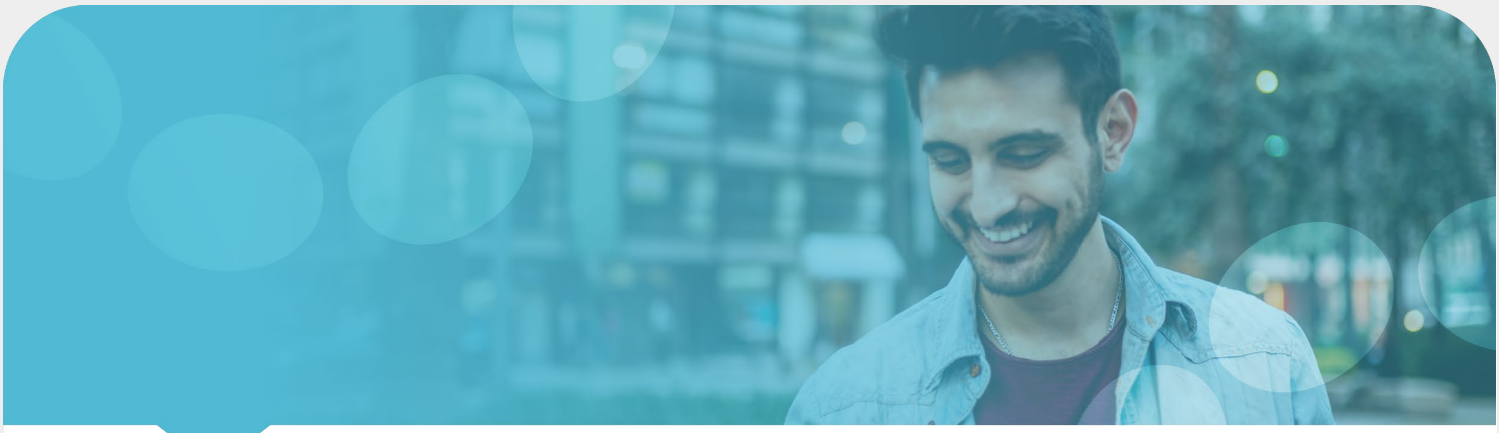

Our Expectation of Employees

Employees play an essential role in Tenpoint's success.

Employees are responsible for their behavior and job performance, and are expected to understand the Code of Conduct, Company policies and any laws or regulations related to their job responsibilities. It is important to stay alert to situations that could lead to inappropriate or unethical behavior and report concerns through the appropriate channels.

Personal Responsibility

Tenpoint employees and Partners must work to prevent violations of this Code. Tenpoint recognizes that in some instances it may be difficult to determine the correct answer to a particular situation. Since every situation that will arise cannot be anticipated and addressed directly in our Code of Conduct, it is important to remember that there are resources available to assist employees.

Examples of conduct that may be considered harassment include:

ASK YOURSELF:
What exactly am I being asked to do? Does it seem unethical, illegal, or improper?

ASK FIRST, ACT LATER:
If you are unsure of what to do in a given situation, discuss the problem with your supervisor or a member of the Human Resources department. This is the basic guidance for all situations.

SEEK HELP FROM OTHER COMPANY RESOURCES:
In cases where you feel it is uncomfortable to discuss an issue with your supervisor, consult with a member of the Human Resources or report the concern through the Tenpoint Ethics Hotline at tenpointtx.ethicspoint.com or at 833-940-1073.

YOU MAY REPORT CODE VIOLATIONS IN CONFIDENCE AND WITHOUT FEAR OF RETALIATION:
Where permitted by law and available through the Tenpoint Ethics Hotline, reports may be made anonymously. Tenpoint does not permit retaliation of any kind against employees for good-faith reports of Code violations.

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Responsible Social Media

We may use social media personally. Remember, anything shared online can quickly reach a global audience and is permanent. Always use common sense and discretion.

> **Employees must use social media responsibly, both at work and personally. All online activity should reflect our Code of Conduct.**

Harassment, inappropriate language, bullying or discrimination are unacceptable and violate this Code. Maintain professionalism on all social media platforms, as failure to do so is a breach of our standards.

Only approved Tenpoint Designated Spokespersons may share company or product information on social media and must follow Tenpoint's Corporate Affairs Social Media Guidance.

Nothing in this section is intended to restrict or interfere with employee's right to maintain blogs or webpages, or to participate in social media, including X (Twitter), Facebook, Instagram, LinkedIn and similar sites. However, to protect the Company's interests, employees must adhere to the guidelines that apply to social media activities by employees.

*For employees, social media guidance is governed by the **Employee Handbook**.*

Insider Trading

All non-public information about Tenpoint (or another company) must be considered confidential information. Confidential information that could affect the price of a stock (Tenpoint's or another company's) or could be considered important by investors trading in a stock is commonly called "inside information."

The use of "inside information" for personal financial benefit or to "tip" others who might make an investment decision on the basis of this information is illegal; doing so can result in fines and criminal prosecution both for the person who trades and for the person who divulges the information.

To avoid even the appearance of trading on inside information, certain Tenpoint employees are restricted to specific times in which they can trade in Tenpoint stock.

*Employees who believe they may be subject to these trading periods or have questions about a specific situation should consult with the **Legal Department** before trading.*

WHAT IS "INSIDE INFORMATION"?

"Inside Information" is material, non-public information that investors would consider relevant to making an investment decision.

Examples include:

- Ongoing negotiations of a merger, acquisition, licensing, or similar transaction
- Approval of new products
- Entry into significant new contracts
- Sales of assets
- Changes in management
- Earnings statements or forecasts

Record Keeping

Company records, such as financial information, product information, and government filings, must be an accurate and verifiable record of all activities and transactions. **All data must be recorded and maintained according to Tenpoint's record retention policies and procedures.**

> **Tenpoint's processes are designed to ensure reasonable assurance of effective and efficient operations, compliance with laws and regulations, and the safeguarding of assets and reliable financial information (Sarbanes-Oxley Act of 2002).**

Tenpoint employees and Partners entrusted with control over these assets and financial information, shall, through the use and maintenance of controls, implement and uphold an environment in line with Tenpoint's Compliance Framework. Financial information shall be presented fairly, in all material respects, reflecting the financial position of Tenpoint. Maintaining undisclosed or unrecorded funds or assets and liabilities established for any purpose is prohibited

The manner in which information is recorded reflects on Tenpoint's scientific and business integrity, and all employees are responsible for adhering to the highest standards of their profession. Reports and interpretation of data and results (including financial results) must be done in good faith and in such a manner as to prevent misleading the reader, or disguising or misrepresenting any aspect of a transaction. Falsification of records or misrepresentation of facts is prohibited by Tenpoint.

Business records and communications often become public and therefore the content of such records and communication must be professional, precise, and accurate, and may not contain exaggeration, derogatory remarks, guesswork, or inappropriate characterizations of people and companies. This applies equally to electronic communications (such as email), internal memos, and formal reports.

Company records must be maintained, stored and, when appropriate, destroyed in accordance with Tenpoint's record retention policies and SOPs, and in compliance with applicable laws and regulations (e.g., drug regulatory, environmental, tax, employment, and trade regulations).

Under certain circumstances, such as litigation or governmental agency requests, Tenpoint may be required to preserve documents and information beyond their normal retention period.

*To understand which records must be preserved, or if a question arises as to the interpretation of a records and information retention policy, the **Legal Department** should be consulted.*

Intellectual Property

Protecting Tenpoint's intellectual property is essential to maintaining a competitive advantage. We are expected to establish, support, maintain and defend Tenpoint's intellectual property (including but not limited to patents, patent applications, trade secrets, trade names, service marks, and copyrights) in a manner that protects the highly sensitive nature of the information and its commercial value to Tenpoint.

PROTECTING COMPANY PROPERTY & RESOURCES

- Handle Company assets and equipment carefully to minimize loss and damage
- Use Company assets for legitimate Company business purposes only
- Secure Company equipment and information such as laptops or work files when traveling or at other times when they are outside the office
- Follow Company policies and instructions regarding user IDs and passwords
- Notify the Information Technology (IT) department and your supervisor immediately in the event of loss or theft of equipment
- Do not introduce software onto Company-provided equipment without the advance approval of Tenpoint's IT department

Tenpoint Property & Resources

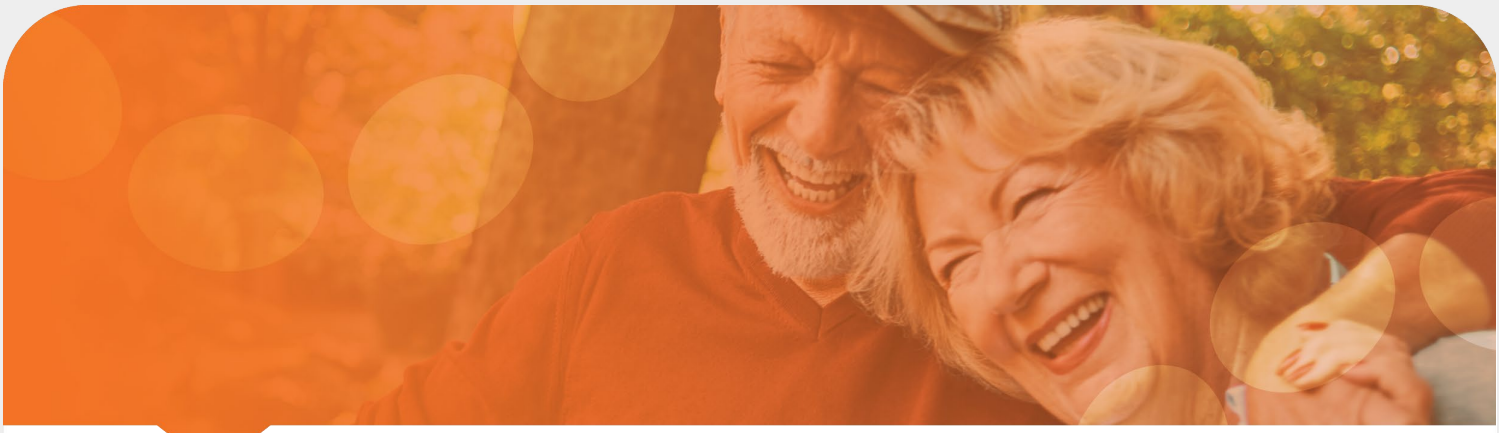
All Tenpoint facilities and equipment are Tenpoint property. We are responsible for the appropriate use of Tenpoint facilities, equipment, and services.

> **Any suspected incident of theft or fraud must be reported immediately for investigation.**

We are not permitted to access another computer unless prior permission is received from that employee or from a supervisor in instances where such action is necessary to conduct Tenpoint business. It is against Tenpoint's policy to use or divert any Tenpoint property, including services of other employee's and Tenpoint's information, for personal advantage or benefit or for use in non-Tenpoint business activities or non-business activities unrelated to Tenpoint.

Equipment & Electronic Communications

Tenpoint laptops, communications devices/equipment, and networks may only be used in accordance with Company policy and may never be used to access, receive, or transmit material that is illegal or inappropriate. If sending proprietary or confidential information to persons outside of Tenpoint's email system or if receiving information from persons that are transmitting such information via a non-company email or data transfer system, Tenpoint's IT safety protocols and precautions must be observed.



Our Commitment to Customers & Patients

At Tenpoint, we strive to achieve quality healthcare outcomes for our patients through our focus on customers, efficiency, innovation and people.

We are committed to earning the trust and confidence of our customers every day by delivering effective, safe and high quality products that are available to patients. Every employee and Partner involved in a product's development, production, distribution, sale or service of a product is responsible for ensuring that our products are safe, effective and meets stakeholder expectations.

Confidentiality

Confidential information includes information about Tenpoint operations, performance, technology, products, or employees that has not been publicly disclosed by an authorized spokesperson of Tenpoint or is not available from public sources.

> **Protecting confidential information is critical to Tenpoint's competitive edge and is every employee's responsibility.**

Types of confidential information include:

- Financial records and data
- Marketing and business plans
- Research and scientific data
- Clinical study information
- Technical designs and processes
- Manufacturing designs and processes
- Unpublished patent applications or invention disclosures
- Information that would enable a competitor to gain a competitive advantage
- Information that may influence Tenpoint's share value

Confidential Information that Belongs to Third Parties

Providing Tenpoint employees with information about other companies is acceptable only when the information is obtained lawfully (e.g., through the public domain). We do not use or disclose another company's confidential information unless it was legally obtained by Tenpoint or has otherwise been authorized.

> **Confidential information rightfully provided to Tenpoint must be protected and we may not use or disclose by this information to any other party except according to the terms under which it was provided.**

Tenpoint employees who are offered or come into possession of information belonging to another company or about another company, and who are unsure of its status, or believe it may be confidential, should consult the Legal Department.

Privacy

Tenpoint is committed to protecting the privacy and integrity of personal information in all business activities. To the extent legally permissible, Tenpoint may collect personal information; however, Tenpoint will only collect such information for legitimate business purposes and retain it only as long as is necessary or required by law. In addition, Tenpoint takes precautions to safeguard the security of personal information when it is collected, processed, stored, and transferred, and will provide notice and obtain consent prior to obtaining personal information, consistent with applicable laws and regulations.

WHAT IS PERSONAL INFORMATION?

Personal information is any information that can be used, alone or in combination with other information, to identify a specific individual. It includes such information as an individual's name, birth date, gender, home and business addresses, social security number, identity card/passport numbers, driver's license number, financial account and credit card number, picture, relatives, telephone number, email address, and other document or electronic identifiers.

Scientific Integrity

Research integrity is fundamental to the scientific process and to Tenpoint's ability to bring novel products to market.

We are expected to protect the integrity of the research and development process by ensuring that all research, including but not limited to non-clinical and clinical development, is conducted according to all applicable laws and regulations and to the generally accepted standards of the scientific community.

Scientific misconduct is prohibited. Examples of scientific misconduct include but are not limited to fabrication, falsification, or plagiarism in proposing, conducting, or reporting research.

> **Scientific misconduct disregards the intellectual contributions and property of others, impedes the progress of research, and corrupts the scientific record.**

Interactions with Healthcare Professionals & Promotional Activities

We are committed to the appropriate use of its products and recognizes the importance of providing Healthcare Professionals (HCPs) with the critical information that they need to make fully informed prescribing decisions.

For the purposes of this Code, an HCP is any person or entity that interacts directly with patients and has a role in the diagnosis or treatment of the patient or is licensed and permitted by law to prescribe drugs for medical use, or is in a position to arrange for or recommend the purchase of Tenpoint's products.

Interactions and communications undertaken on behalf of Tenpoint must be focused on informing HCPs about Tenpoint's products, providing scientific and educational information, and supporting medical education. Since Tenpoint provides information through various channels, it is critical that promotional interactions and communications are in full conformity with applicable approved product labeling and meet the highest professional, marketing, and promotional standards.

Monitoring the Safety, Performance & Quality of Tenpoint's Products

Patient safety, through the optimal performance and quality of products, is fundamental to our Company's mission. Tenpoint takes seriously its commitment to ensure that our products have and maintain an acceptable risk-to-benefit profile when used in accordance with the product labeling and good medical practice.

From a quality perspective, we continue to work with our Partners both internally and externally to attain and sustain E2C (Efficient, Effective and Compliant) quality including implementing and continuously improving robust quality systems, drive operational excellence, and ensuring that all sites that manufacture Tenpoint product maintain sustainable compliance.

We perform extensive and robust non-clinical and clinical testing to identify the safety and tolerability profile of products and, once approved for use, the products are continuously monitored through the use of post-marketing surveillance and spontaneous reports from prescribers and consumers.

It is our responsibility to promptly report any adverse drug experiences that we become aware of that could be associated with a Tenpoint product to Tenpoint's Pharmacovigilance Team.

WHAT IS AN ADVERSE DRUG EVENT/EXPERIENCE?

An **adverse drug event/experience** is defined as any unfavorable and unintended sign, symptom, or disease associated with the use of the product irrespective of causal relationship.

It also includes:

- A product quality defect
- Exposure during pregnancy or lactation
- Misuse, abuse, or overdose
- Medication errors (e.g., dispensing errors, administration errors, etc.)
- Overdose (whether intentional, accidental, or prescribed)
- Occupational exposure as a result of one's professional or non-professional occupation
- Reports of suspected falsified products
- Reports on any transmission of an infectious
- agent via the product/s
- Drug-drug or drug-food interactions
- Withdrawal symptoms
- Lack of effect or worsening of a pre-existing condition
- An unintended beneficial effect

Our Commitment to Fair Business Practice

Tenpoint is committed to conducting business ethically and with integrity.

Interactions with vendors, customers, competitors, collaborators, healthcare professionals, patients, and government officials must always be legal, transparent, and ethical. Offering or accepting an inducement (financial or otherwise) in exchange for the purchase of and/or recommendation to purchase a product or service is inappropriate and prohibited.

Examples of prohibited "inducements" to secure business may include:

- Gifts, entertainment, or hospitality that is excessive or lavish
- Donations to third parties at the request or direction of another party
- Paying travel expenses or accommodations for an individual without a legitimate business purpose
- Accepting or providing a gift, money, cash equivalent, or other item of value
- Providing free goods or services
- Payments to government officials to influence governmental actions

Gifts & Entertainment

NON-GOVERNMENTAL, NON-HCP BUSINESS ASSOCIATES

The provision of anything of value such as a modest meal, gift and/or entertainment, may be acceptable under certain circumstances, the business courtesy must be reasonable in nature, permissible under applicable laws and regulations, and compatible with industry standards and local customs. To avoid even the appearance of a conflict of interest, employees must inform their supervisor and subsequently Compliance.

Tenpoint employees are strictly prohibited from requesting business courtesies of any kind. If refusal of a gift that exceeds normal business courtesy would offend the giver, the gift should be accepted and then forwarded to the Corporate Compliance Office for appropriate handling.

HEALTHCARE PROFESSIONALS (HCPS)

Offering anything of value to HCPs is regulated in many countries by law and/or industry codes, which are concerned with the potential conflict of interest created by the industry's influence on HCPs. In general, the provision of anything of value to HCPs with the intent to inappropriately induce an HCP to prescribe, purchase or recommend a Tenpoint product is prohibited. There may be exceptions in certain countries, but employees must use caution and good judgement. Contact Compliance or Legal for more details related to the local laws and regulations.

GOVERNMENT OFFICIALS

Many countries have anti-bribery laws regulating the offering of business courtesies to government employees and representatives (collectively, "government officials"). Tenpoint policy prohibits offering, promising, paying, or giving anything of value, directly or indirectly, to a government official for the purpose of unduly influencing a government action.

Prohibited items of value may include, but are not limited to, cash payments, meals, personal gifts, travel, and entertainment.

Anti-Competitive Practices & Fair Dealing

Tenpoint is committed to protecting free enterprise through compliance with applicable anti-competition and anti-bribery laws and regulations. Violation of laws and regulations designed to ensure competition and free enterprise can have serious consequences for Tenpoint and for individuals.

Anti-competition issues are complex and should be referred to Legal. Tenpoint seeks to outperform competition fairly and honestly through superior performance and never through dubious or illegal business practices. Misappropriating proprietary information, possessing trade secret information that was obtained without the owner's consent, or inducing such disclosures by past or present employees of other companies is prohibited.

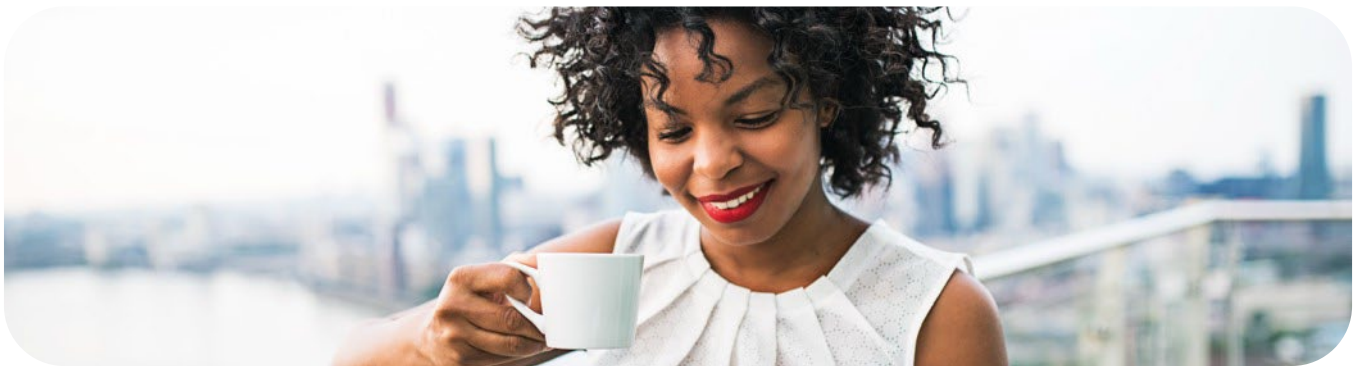
Examples of activities with important anti-competition implications:

- Agreeing with competitors to fix prices or other terms of sale
- Boycotting certain suppliers or customers
- Dividing sales opportunities with competitors by territory or product line
- Agreeing with distributors on mandatory resale pricing
- Price discrimination
- Disparaging, misrepresenting, or harassing a competitor

International Trade

Employees whose job functions involve international trade must be knowledgeable of and compliant with the applicable legal requirements and restrictions, such as trade embargoes, boycotts, import/export restrictions, local importation customs practices and requirements, and other trade and taxation laws and regulations, as well as relevant Company policies.

For questions relating to matters of international trade, employees must consult their supervisor or Tenpoint's Legal Team.



Conflicts of Interest

A conflict of interest exists whenever an individual representing Tenpoint uses their position to engage in conduct that compromises, or appears to compromise, their ability to make an impartial business decision to the ultimate benefit of Tenpoint.

> **Tenpoint employees are strictly prohibited from engaging in any activities that may result in a conflict of interest, unless previously disclosed to their supervisor and authorized by Compliance.**

It is not possible to describe every situation or occurrence that could lead to a conflict of interest Therefore, employees must avoid any circumstance that could even lead to the appearance of impropriety.

WHAT ARE SOME WAYS TO AVOID CONFLICTS OF INTEREST?

Tenpoint employees can avoid conflicts of interest by always basing business decisions on normal business considerations such as quality, cost, availability, reputation, and other factors bearing directly on the product or service. Tenpoint employees must not use their position to directly or indirectly benefit themselves or others (including but not limited to relatives or close associates).

Decisions and actions involving Tenpoint and its business must always be based upon what is in the best interests of Tenpoint. If you are uncertain whether a conflict of interest might exist, contact your supervisor or Compliance before making a decision or engaging in an activity.

Some common conflict of interest situations may include:

FINANCIAL INTERESTS

- Holding, by a Tenpoint employee or direct family member, a direct or indirect financial interest of more than 5% in a vendor or customer.

EMPLOYMENT

- Being employed by, providing consulting services for, or serving as an officer or director of another company, including but not limited to competitors, customers, suppliers, or vendors of Tenpoint.

BUSINESS & FINANCIAL TRANSACTIONS

- Conducting Tenpoint business transactions with a company that employs a family member of a Tenpoint employee.
- Entering into personal financial transactions with an employee or representative of a customer, competitor, or vendor.

CORPORATE OPPORTUNITIES

- Using non-public information acquired as a result of employment with Tenpoint.
- Taking advantage of business opportunities that rightfully belong to Tenpoint.
- Selling services or products that compete with Tenpoint.

NON-BUSINESS ACTIVITIES

- Participating in trade associations, non-profit or other non-business activities to the detriment of performing job duties at Tenpoint.

PERSONAL USE OF COMPANY PROPERTY & INFORMATION

- Using or diverting Company property for non-business activities.

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Our Commitment to Society

At Tenpoint, we embrace a commitment to grow in a responsible and sustainable manner in order to provide quality products and services to our patients and customers.

We value our shareholders and other stakeholders. We are committed to be a responsible member of society and give back in the communities in which we operate. We also believe our employees have the right to engage in political discussions and have a voice in their society as private citizens.

Public Disclosures

Tenpoint complies with all applicable securities laws, rules and regulations including with respect to disclosures, press releases, and trading in Tenpoint's securities. These laws apply not only to disclosure documents that are filed with various securities regulators, but also to press releases, presentations to securities analysis and other disclosures that are reasonably likely to be disseminated to investors interested in or in possession of Tenpoint securities.

At Tenpoint, only certain Designated Spokespersons, which are limited to the CEO, CFO, VP of Corporate Affairs, the President or their designees may speak publicly about the company or its businesses. All other employees are prohibited from responding to inquiries from the investment community, the media or others unless specifically asked to do so by a Designated Spokesperson. If an employee receives an inquiry from the media, financial analysts or others, please direct them to the Vice President of Corporate Affairs.

Political Contributions & Related Activities

Tenpoint complies with all applicable laws that prohibit corporations from making either monetary or in-kind contributions. Tenpoint employees have the right, and are encouraged, to voluntarily participate in the political process and make personal contributions.

> **If employees choose to participate in the political process, they must do so as an individual and not as a representative of Tenpoint.**

Direct support (financial or otherwise) of political parties or individual candidates for public office by Tenpoint is prohibited. Tenpoint employees, in their company capacity, cannot make any loan, donation, contribution, or payment to a political party, candidate, or political action committee, for or on behalf of Tenpoint, or any project or development in which Tenpoint is engaged, nor shall they cause Tenpoint to reimburse any individual who provides such support.

No one at Tenpoint is allowed to make a political contribution to obtain or retain business or to obtain any other improper advantage. No one may force or threaten force or reprisal against an employee to contribute to, support or oppose any political group or candidate.

Health, Safety & the Environment

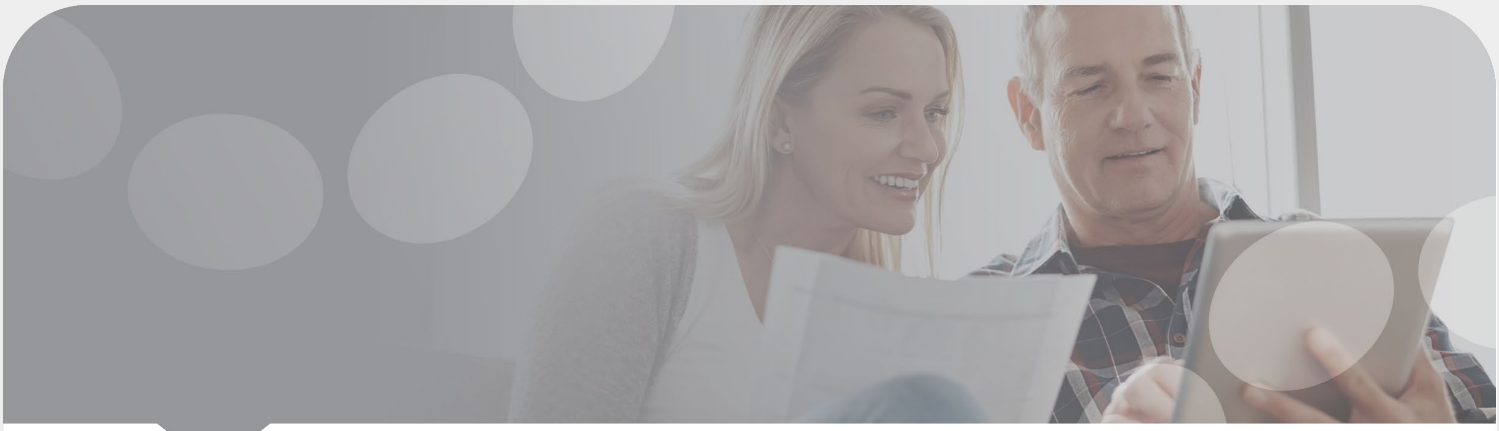
Tenpoint recognizes that excellence in health and safety ("H&S") performance is integral to an efficient and successful business. Tenpoint will constantly pursue high standards of H&S performance in all its activities.

> **All employees must comply with Tenpoint's environmental, health, and safety policies and procedures, as well as local laws and regulations.**

Employees must also attend required training and perform their jobs in a manner that promotes a safe and healthy workplace while also preserving and protecting the environment.

Sustainability & the Environment

Tenpoint is committed to supporting and enhancing the communities in which we operate and continuously reducing the environmental impact of our products, supply chain, manufacturing, distribution, sales and administrative support functions.



Our Commitment to Compliance with Laws, Regulations & Company

Tenpoint requires all employees to comply with all laws, rules and regulations applicable to Tenpoint wherever Tenpoint conducts business.

Employees are expected to use good judgement and common sense in seeking to comply with all laws, rules and regulations and to ask for advice when employees are uncertain about them.

Compliance with Laws, Regulations & Company Policies

Acting with honesty, integrity, and respect is the foundation upon which this Code is built and how Tenpoint conducts business. In addition to this guiding principle, obeying laws and regulations, both in letter and in spirit, is critical to our success. While Tenpoint employees are not expected to know the details of every law or regulation, it is important that employees are aware of the core requirements established in this Code and know when to seek advice from their supervisor or Human Resources. Tenpoint strives to provide fair and competitive wages to our employees based on performance and ethical conduct and to protect our employees from unsafe or improper working conditions.

Tenpoint is also committed to quality in the manufacturing, packaging, and testing of its products. To ensure patient safety, it strives to meet or exceed applicable regulatory authority requirements for current Good Manufacturing, Clinical and Laboratory Practices (cGXPs).

Tenpoint is required to compile and maintain numerous records and to file reports and applications with various government agencies. Virtually all of these agencies operate under laws which make it a crime - punishable by fines and/or imprisonment - to knowingly submit false or incomplete information, to fail to submit required information, or to fail to submit information within a required time period.

> **Carelessness alone can constitute an offense in some instances and can call into question Tenpoint's competency and good faith.**

LAWS & REGULATIONS with which Tenpoint must comply include, among others, those that address:

- The research, development, pharmacovigilance, manufacturing, marketing, promotion, and distribution of pharmaceutical products
- Labor and employment laws
- Securities laws
- Anti-competitive (anti-trust) laws
- Privacy laws
- Corporate Governance laws relating to duties owed by corporate directors and officers

Accordingly, Tenpoint requires that all employees who prepare information, records, or submissions for governmental agencies, or who otherwise deal with such agencies, do so diligently, accurately, completely, and with absolute integrity.

To ensure Tenpoint employees are prepared to perform their duties effectively and in compliance with our quality requirements, Tenpoint provides appropriate instruction and training.

As such, every person conducting business for Tenpoint worldwide must follow and employ reasonable steps to prevent violations of the Code of Conduct, applicable laws and Tenpoint policies. This applies to all levels of management as well as consultants and temporary workers. Those who are in violation may be subject to disciplinary action up to and including termination.

Each department head is responsible for ensuring that employees within their group complete all required training. Employees are expected to complete prescribed training and acknowledge, in writing, that they understand and will comply with relevant laws, rules and regulations, as well as Company policies and procedures.

Questions regarding the interpretation of this Code of Conduct should be directed to the Vice President, Compliance or to Compliance@Tenpointtx.com.

Employees may also seek guidance from their supervisor or Human Resources.

*Reports of suspected violations should be made in accordance with the "**Reporting of Violations of this Code**" section.*

Reporting of Violations of this Code

- Individuals covered by this Code who reasonably believe that there has been a violation must report it promptly. Employees should report concerns to their supervisor or Human Resources. Directors, contractors, consultants, vendors, and other third parties may report concerns through the **Tenpointtx.ethicspoint.com, Tenpointtxmobile.ethicspoint.com or at 833-940-1073.**

The Ethics Hotline is available to all individuals covered by this Code and, where permitted by law, reports may be made anonymously.

All reported concerns will be reviewed and addressed in accordance with Company policy. Reports will be handled as discreetly as reasonably possible, and information will be shared only on a need-to-know basis and/or as required by law.

TYPES OF ISSUES THAT SHOULD BE REPORTED IN ACCORDANCE WITH THE CODE OF CONDUCT

Examples include:

- Misconduct regarding sales and marketing practices
- Fraudulent financial reporting
- Insider trading
- Harassment or discrimination
- Disclosure of confidential information
- Environment, health and safety issues
- Data privacy violations

Tenpoint prohibits retaliation against any individual who, in good faith, reports a concern or participates in a review process. If a violation of this Code is confirmed, Tenpoint will take appropriate corrective action.