

CAPSTONE THERAPEUTICS CORP.
CODE OF CONDUCT

The Capstone Therapeutics (the “Company”) Code of Conduct outlines expected behaviors for all Capstone employees. Capstone will conduct its business fairly, impartially, in an ethical and proper manner, and in full compliance with all applicable laws and regulations. In conducting its business, integrity must underlie all company relationships, including those with customers, suppliers, communities and among employees. The highest standards of ethical business conduct are required of Capstone employees in the performance of their company responsibilities. Employees will not engage in conduct or activity that may raise questions as the Company’s honesty, impartiality, reputation or otherwise cause embarrassment to the Company.

Employees will ensure that:

- They do not engage in any activity that might create a conflict of interest for the Company or for themselves individually.
- They do not take advantage of their Capstone position to seek personal gain through the inappropriate use of Capstone or non-public information or abuse of their position. This includes not engaging in insider trading.
- They follow all restrictions on use and disclosure of information. This includes following all requirements for protecting Capstone information and ensuring that non-Capstone proprietary information is used and disclosed only as authorized by the owner of the information or as otherwise permitted by law.
- They observe that fair dealing is the foundation for all Company transactions and interactions and practice honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships.
- They protect all Company and vendor assets and use them only for appropriate Company-approved activities.
- Without exception, they comply will all applicable laws, rules and regulations.
- They promote full, fair, accurate, timely and understandable disclosure in reports and documents that Capstone files with, or submits to, the U.S. Securities and Exchange Commission and in other public communications made by Capstone.
- They promptly report any illegal or unethical conduct to management or other appropriate authorities (i.e. Ethics, Law, Security, EEO).

Every employee has the responsibility to ask questions, seek guidance and report suspected violations of this Code of Conduct. Retaliation against employees who come forward to raise genuine concerns will not be tolerated.

To report any code violations please call our hotline at 602-286-5479