



# ROCKET PHARMACEUTICALS, INC.

Code of Business Conduct and Ethics

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**MAKING THE RIGHT CALL - WHEN IN DOUBT ASK YOURSELF:**

- Will my conduct allow us to maintain the trust of all our stakeholders?
- Have I thought about the impact on those who will be affected by my conduct?
- How would it be viewed by the media, the public and the government?
- Would my family and friends think that my conduct was ethical?
- Is my conduct legal and compliant with Rocket policies?

**REPORTING CONCERNS – WHO TO CALL:**

- Contact your manager
- Email [compliance@rocketpharma.com](mailto:compliance@rocketpharma.com)
- Call our Compliance and Ethics Helpline number at 844-990-0002\*
- Submit a report online at <https://report.syntrio.com/rocketpharma>\*
- Send an e-mail to [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com)\*
- Write to the Audit Committee, c/o Rocket Pharmaceuticals, Inc., 9 Cedarbrook Drive, Cranbury, NJ 08512\*

*\*Report may be made anonymously through this channel*

# Introduction and Guiding Principles

## Introduction

The Rocket Code of Business Conduct and Ethics (the “Code”) applies to all employees, officers and directors of Rocket Pharmaceuticals, Inc. (the “Company” or “Rocket”). Rocket expects its independent contractors, consultants and other third parties working with Rocket to comply with all applicable laws and regulations, as well as with the compliance principles set forth in this Code. The Company strives to uphold high legal and ethical principles and standards and has adopted this Code to promote:

- Compliance with applicable governmental laws, rules and regulations;
- Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest;
- Full, fair, accurate, timely and understandable disclosure in reports and documents that the Company files with, or submits to, the United States Securities and Exchange Commission (“SEC”), other regulatory agencies and in the Company’s other public communications;
- The prompt internal reporting of suspected violations of this Code to appropriate persons or through the Compliance and Ethics Helpline;
- Complete cooperation in the investigation of reported violations and the provision of truthful, complete and accurate information; and
- Accountability for adherence to this Code.

## Your Responsibilities

This Code is meant to familiarize you with the Company’s commitment to conducting business in a lawful and ethical manner. Although the Code references other Rocket policies, it does not supersede those policies. It is important that all employees read, understand and comply with the Code and other policies that apply to them as an employee of Rocket and to their specific position. We expect all Rocket employees, officers and directors to:

- Understand and comply with the Code and all other Rocket policies in both spirit and intended principle;
- Always act with honesty, integrity and high ethical standards in conducting Rocket business;
- Consistently treat fellow employees, patients and others with whom we do business with respect;
- Ask questions if you are unsure about what to do in a particular situation;
- Promptly report any violations of law or other misconduct that are significant in nature or scope to the Compliance Officer, through the Compliance and Ethics Helpline or other appropriate channel;
- Comply with this Code both on Rocket premises and when representing the Company offsite (including at trade shows, investigator meetings and conferences), even if the local laws or customs have lower or different standards;
- Fully and honestly cooperate with any investigation of alleged misconduct; and

Refrain from engaging in any conduct that is, or may be perceived to be, retaliatory against anyone for raising a good faith question or concern about compliance with policy or legal requirements.

This Code does not and cannot cover every possible situation or activity governed by the laws, rules, regulations and ethical standards applicable to our industry. Rather, it summarizes certain laws and principles of ethical business conduct and provides guideposts to assist you in engaging in lawful and ethical conduct.

## Additional Responsibilities of Managers and Directors

If you are a manager, officer or director, you have additional responsibilities for creating and upholding a culture of compliance and must serve as a positive role model for employees. Managers and directors are responsible for:

- Creating an environment where employees are encouraged to ask questions and raise concerns without hesitation or fear of retaliation;
- Demonstrating commitment to maintaining high ethical standards and the importance of compliance with the Code;
- Promoting honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest; and
- Promptly reporting any and all suspected violations of the law, the Code or other Rocket policies that are significant in nature or scope.

## Reporting Compliance Concerns

The best starting point for seeking advice on ethics-related issues or reporting potential violations of this Code will usually be your manager or Rocket's Compliance Officer ([compliance@rocketpharma.com](mailto:compliance@rocketpharma.com)).

However, if the conduct in question involves your manager or the Compliance Officer, if you have reported the conduct in question to your manager or the Compliance Officer and do not believe that he or she has dealt with it properly, or if you do not feel that you can discuss the matter with your manager or the Compliance Officer, there are other options. You may call our Compliance and Ethics Helpline number at 844-990-0002; submit a report online at <https://report.syntrio.com/rocketpharma>; send an e-mail to [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com) (anonymity can be maintained); or write to the Audit Committee, c/o Rocket Pharmaceuticals, Inc., 9 Cedarbrook Drive, Cranbury, NJ 08512.

While we prefer that you identify yourself when reporting violations so that we may follow up with you for additional information as needed, you may leave messages through these channels anonymously.

## Investigations Process

Rocket's Compliance Officer and/or their designees will promptly investigate reports of potential ethical issues or violations of this Code. Employees, officers and directors are expected to cooperate fully with any inquiry or investigation by the Company regarding an alleged violation of this Code, the law and/or other Rocket policies. Failure to cooperate with any such inquiry or investigation may result in disciplinary action, up to and including termination of employment.

Employees sometimes are curious about the outcome of an internal investigation, particularly if they reported the conduct at issue or were interviewed in connection with an investigation. To protect confidentiality, the privacy of those involved and to comply with applicable laws, the Company may not disclose the status of its investigations or findings of those investigations. Please know, however, that all Company investigations will be performed thoroughly and promptly.

## Non-Retaliation

Open communication is vital to the success of our Company. We are committed to maintaining a work environment where people can ask questions, voice concerns, and make appropriate suggestions regarding business practices. Rocket strictly prohibits any form of retaliation against employees who, in good faith, ask questions, report or provide information in an investigation about any conduct or activity that may violate this Code, Company policies, any law or regulation applicable to the Company or any other suspected improper, unethical or illegal conduct or activities by anyone at the Company.

These reporting channels should not be used in a false or frivolous manner or to report grievances that do not involve this Code or other ethics-related issues. Making a complaint or report in bad faith is itself a violation of this Code.

## Disciplinary Action

Failure to comply with the standards outlined in this Code will result in disciplinary action, up to and including termination of employment. Certain violations of this Code may require the Company to refer the matter to the appropriate governmental or regulatory authorities for investigation or prosecution. Moreover, any manager who directs or approves of any conduct in violation of this Code, who has knowledge of such conduct and does not immediately report it or who fails to detect or correct a violation, will be subject to disciplinary action, up to and including termination of employment.

## Conducting Our Business

### Compliance with Laws, Rules and Regulations Worldwide

Our industry is highly regulated, and regulation affects virtually every area of Rocket's business. Rocket and all of its employees are required to comply with all laws, rules and regulations that apply to the operations of the Company. We are members of the Biotechnology Innovation Organization (BIO) and have made a commitment to uphold their standards as well. Because Rocket conducts activities outside of the United States, the laws and regulatory requirements of more than one country may apply to certain activities. In the event local laws and regulatory requirements differ from the Code or other Rocket policy, the stricter requirements generally apply. The actions of each employee must reflect the Company's commitment to honest, ethical and professional conduct. We do not compromise our standards for any reason, including to achieve any goal. We expect our independent contractors, consultants and other third parties working with Rocket to comply with the principles set forth in this Code, as well as with the applicable laws and regulations of the countries in which they operate and with internationally accepted best practice standards. If you have questions about which laws, regulations, policies or standards apply to your role and activities, please consult with your manager or the Legal or Compliance Departments.

### Scientific and Research Integrity

Rocket is devoted to scientific excellence in biopharmaceutical research and development to advance innovative, high-quality therapies that address the unmet medical needs of patients with rare, undertreated diseases. We conduct research and development with uncompromised ethical integrity and consistent with applicable laws, regulations and practice guidelines, including Good Laboratory Practices and Good Clinical Practices.

Rocket is committed to providing a high degree of transparency relative to the research that it conducts and sponsors, as well as the results and outcomes of such research. We hold publication of scientific information in the highest regard and support authors who take responsibility and accountability for their published work. In the true spirit of science, we are dedicated to sharing our clinical trials information and data with patients, medical/research communities, the media, policy makers and the general public. We do this in a manner that safeguards patient privacy and informed consent, respects the integrity of national regulatory systems and maintains incentives for investment in biomedical research.

### Interactions with Healthcare Professionals and Healthcare Organizations

We respect the practice of medicine and we support the integrity of the physician-patient relationship. Rocket interacts with health care professionals, patient advocacy groups, payers, and others in a way that does not have, or appear to have, an improper influence on their decisions. All interactions and

communications undertaken on behalf of Rocket with health care professionals must be conducted in a manner that is fair and balanced, scientifically rigorous, accurate, not misleading and compliant with applicable medical, legal and regulatory standards. In the event that our research or business requires that we engage the services of a health care professional to serve as an investigator, consultant or speaker, we do so in order to meet a legitimate and appropriate business purpose and only when the terms of the engagement are consistent with applicable legal and Rocket policy requirements. We adhere to applicable industry guidelines and other regulations, only offering meals and hospitality in a manner that is consistent with our Policies and is conducive to educational, clinical or scientific discussions. We collect, report, and disclose payments and other transfers of value made to health care professionals where required by law.

## Competition and Antitrust Laws

Rocket believes in creating competitive advantage only through lawful and ethical means. Rocket is committed to complying with applicable competition and antitrust laws. These laws are complex, but are intended to protect free enterprise, prevent restraints on trade and monopolization, abuses of a dominant market position and unfair trade practices. You must be especially careful not to discuss confidential information with competitors, including, but not limited to, pricing, costs, sales data or other terms of sale, supply information, bids and contracts with vendors. It is your responsibility to be aware of these laws, as violations of antitrust and competition laws can carry severe penalties for both Rocket and its employees, officers, directors and agents.

## Insider Trading

All Rocket employees are prohibited from buying, selling or engaging in any other transaction with respect to securities of Rocket or any other company while in possession of material, nonpublic information. Material information is any information that a reasonable investor would consider important in making an investment decision. In other words, you cannot use non-public information obtained through your employment to buy or sell securities. All employees must also refrain from sharing, tipping or disclosing material, non-public information with others. This remains true even in the event that you are no longer working with or for Rocket. Please refer to Rocket's Insider Trading Policy for more information. If you are uncertain about the constraints on your purchase or sale of any securities by virtue of your relationship with Rocket, you should consult with the Compliance Officer before making any such purchase or sale. Securities laws and violations are taken very seriously.

## Preventing Bribery and Corruption

We must build our business relationships through trust and integrity, not favors and gifts. Rocket prohibits employees and anyone acting on Rocket's behalf from offering, giving, requesting, accepting or receiving a bribe or kickback. A bribe or kickback may be defined as any money, fee, commission, credit, gift, gratuity, thing of value or compensation of any kind that is provided, directly or indirectly, and that has as one of its purposes, the improper obtaining or rewarding of favorable treatment in a business transaction. A bribe or kickback is considered illegal in all countries in which Rocket conducts business. Rocket also does not engage in providing payments or other items of value to expedite Rocket's business. In addition to exposing Rocket to severe sanctions, any employee, officer, director or other person acting on behalf of Rocket who engages in such conduct can also face substantial fines and/or imprisonment.

## U.S. and Foreign Government Officials

No Rocket employee or anyone acting on behalf of Rocket may provide a payment, fee or gift to a U.S. federal, state or local public official that is intended to improperly influence a government official or gain an unfair advantage.

The U.S. Foreign Corrupt Practices Act of 1997 (“FCPA”), United Kingdom Bribery Act and other countries’ anti-corruption laws apply to and prohibit the provision of business courtesies and other financial arrangements, such as gifts, travel, entertainment, commissions, shares, or discounts, to non-U.S. government officials, employees and other similar individuals and entities. These laws may be applicable even when a payment occurs outside of the recipient’s home country or where an intermediary or third party is used to facilitate the transaction or arrangement. The FCPA also makes it illegal to inaccurately record transactions in Rocket’s books and business records. Rocket must comply with the FCPA as well as other applicable anti-corruption and anti-bribery laws. Rocket strictly prohibits the direct or indirect offering, authorizing, promising or making of any payment or gift of anything of value to foreign government officials and public employees (including, but not limited to, employees of state-owned or controlled companies or institutions such as hospitals and universities), candidates for political office and political parties (including party officials) for the purpose of influencing an official act or decision to award or retain business, or to gain an improper business advantage. These prohibitions are not limited to cash payments, but cover anything that has any value to the recipient.

## Political Participation

Rocket encourages its employees to participate in the political process as individuals and to volunteer for political purposes, or not, as they choose. Employees may not use Company time, property, or facilities for personal political activity.

## Data Privacy

While privacy obligations differ from country to country, it is important to note that many countries have adopted laws to protect personal information that is gathered from various sources, including patients, clinical trial subjects, customers, healthcare providers and employees. Rocket is committed to protecting the privacy and integrity of personal information (including personal health information) that comes into its possession. You can help protect the privacy of personal information by adhering to these principles:

- Follow all Company policies and procedures for handling and destroying personal information;
- Comply with all applicable laws and regulations when collecting, using and destroying personal information;
- Collect the minimum amount of information necessary to achieve the business purpose;
- Never seek, obtain, receive or view personal health information about specific patients from healthcare professionals or patients;
- Store personal information for only so long as is necessary to complete the business objective;
- Share information only with individuals who have a legitimate need for the information and who agree to keep the information secure; and
- Report any incident of improper or accidental disclosure to your manager or the Compliance Officer.

## Global Trade Compliance

Many countries have laws regulating international trade through restrictions on imports and exports of goods, technology, information and services. It is our policy to comply fully with applicable trade laws and regulations. If your work involves international trade activities, you must be familiar with and follow the relevant laws and regulations in this area.

# Protecting Our Employees

## Employment Policies–Equal Opportunity

A diverse workforce fosters innovation and strengthens Rocket’s business. We ensure equal opportunity without discrimination or harassment in the workplace on the basis of gender, race, color, religion, national origin, age, physical or mental disability, pregnancy, citizenship, status as a protected veteran, marital status, sexual orientation, gender identity and expression, genetic information, or any other characteristic protected by applicable laws. This applies to all phases of employment, including the hiring of new employees, training, development, compensation, promotions, demotions, transfers, and terminations.

## Professional Conduct / No Discrimination or Harassment

Rocket team members act in accordance with the highest standards of professional conduct and strive to treat everyone with whom we interact with respect and dignity. Regardless of whether you are interacting face-to-face or communicating in writing or via electronic media, you should do so in a professional, respectful manner. Specifically, the use of offensive language, intimidating or hostile words or actions, and similar unprofessional behavior is contrary to Rocket’s standards, inconsistent with this Code and may result in disciplinary action. We reinforce the importance of building strong relationships, creating an inclusive culture and supporting team members to meet shared goals. Rocket leaders and managers have a responsibility to foster a positive working environment that enables respect, honesty, integrity, safety, and trust.

## Health and Safety

Rocket conducts its operations with the highest regard for the health and safety of its employees. Employees are responsible for complying with safety rules and regulations, and for taking necessary precautions to protect themselves and their colleagues, including taking steps to correct unsafe practices and conditions. Employees must report all accidents, work-related injuries, security emergencies and theft to the Human Resources Administrator. Violent acts or threats of violence made by a Rocket employee against any other person’s life, health, well-being, family or property are prohibited and will not be tolerated.

## Drugs and Alcohol Abuse

Substance abuse can pose serious safety and health concerns in the Rocket workplace. Rocket is committed to providing a work environment free of substance abuse for the benefit of its employees and the Company. The use of illegal drugs and the abuse of alcohol or over-the-counter or prescription drugs are prohibited in the workplace, regardless of location. All employees are prohibited from working in Company facilities, operating a Company vehicle or a vehicle subsidized by the Company, or conducting Rocket business off-site if under the influence of or impaired by alcohol or drugs. On rare occasions, alcohol may be served in connection with a Rocket-sponsored function or event and, if served, must be consumed responsibly.

Subject to applicable laws and practices, employees may be subject to drug/alcohol testing if there is a reasonable suspicion of drug or alcohol abuse, or after a work-related injury or accident.

## Conflicts of Interest

Conflicts of interest may take many forms. Employees, officers and directors must act in the best interests of Rocket. You must refrain from engaging in any activity or having a personal interest that presents a “conflict of interest,” or even the appearance of a conflict of interest, which can harm the trust of our

patients, fellow employees, suppliers and other business partners. A conflict of interest can arise whenever you, as an employee, officer or director, take action or have a personal interest that prevents you from performing your Company duties and responsibilities honestly, objectively and effectively.

## Outside Business and Other Interests

If your outside business or other interests affect your objectivity, motivation or performance as a Rocket employee, a conflict of interest can arise. For this reason, outside employment is strongly discouraged. Additionally, you should not use Rocket's name, information, work time, property, or other resources to perform a second job or to undertake other outside personal activities. You should also consider potential conflicts with Rocket's business interests before agreeing to serve as a director, officer or other responsible position for an outside business; seeking a political or other government position; or engaging in service with a charitable, civic, religious, educational, public, political, or social organization. Where there is even a potential appearance of conflict, seek guidance and approval consistent with Rocket policy. Before serving as a director or officer of another for-profit company, you are required to obtain approval from the Compliance Officer and Chief Executive Officer. Although involvement in charitable organizations and serving on non-profit boards is encouraged, if you represent Rocket while doing so, or your activities overlap with any of Rocket's activities, you must first seek approval from the Compliance Officer.

## Relatives and Personal Relationships

Rocket seeks to hire individuals who contribute to the Company's success. However, a potential conflict arises if an employee hires, manages or otherwise conducts Company business (e.g., via a Company vendor or supplier) with a close personal friend, relative or someone with whom he/she has had an intimate relationship. Due to the potential for perceived or actual conflicts resulting from these relationships, you must disclose to the Compliance Officer all potential conflicts of interest, including if your family member or close friend has an ownership interest or is a manager or executive for a Rocket vendor or business partner. If you are uncertain about any potential conflict of interest, seek guidance from the Compliance Officer.

## Corporate Opportunities

All employees, officers and directors have a duty to advance the legitimate interests of Rocket. Therefore, you may not:

- Take for yourself corporate opportunities that are discovered through the use of Rocket property, information or position, without first offering such opportunities to the Company;
- Use Company property, information or position for personal gain; or
- Compete with the Company.

## Proper Use of Company Assets

We respect and care for all Rocket assets and resources and commit to using those assets to further the Company's mission. We strive to protect those assets, including physical equipment, funds, property, supplies or other items of value.

As a general rule, Company assets should be for business use and should not be used for personal purposes. You may use computers and communication tools for personal use as long as such use does not violate any Rocket policy or affect your work productivity. Keep in mind that you have no expectation of privacy with regard to any material (including emails or text messages) that you create, view, access, receive or store on Rocket systems or networks.

## Protection of Intellectual Property and Other Confidential Company Information

Intellectual property – such as patents, trade secrets, copyrights, trademarks, logos, business processes, research, and customer or supplier lists – provides Rocket with a competitive advantage. We share a passion to be innovative, to develop new ideas and new ways to do things, and we must also share in the responsibility to protect Rocket’s innovation and intellectual property assets. We will protect such intellectual property against loss, theft, or other misuse.

You must also respect the intellectual property of others. All employees, officers and directors must maintain the confidentiality of sensitive business, technical, scientific, specific employee information or other information entrusted to them by the Company, its customers, suppliers, business partners or collaborators, except when disclosure is authorized or legally mandated. Confidential information includes all non-public information that might be of use to competitors or harmful to the Company, its customers, suppliers, business partners or collaborators if disclosed. Financial information should, under all circumstances, be considered confidential except where its disclosure is approved by Rocket, or when it has been made public in a press release or a report filed with the SEC. You can help Rocket protect its confidential information by adhering to the following principles:

- Be careful with your communication activities, especially in a public setting. Do not discuss confidential Rocket business in any public location (e.g., airport terminals, train stations, hotel lobbies, etc.);
- Dispose of confidential information properly;
- Exercise care when storing and sending confidential information through electronic means;
- Secure all confidential information while working in an unsecure workspace or in an open area;
- Report any incident of improper or accidental disclosure to your manager or the Compliance Officer; and
- Do not provide confidential information to third parties, including vendors or contractors, without appropriate authorization and any required confidentiality agreements.

The obligation to preserve and protect the confidentiality of Rocket’s intellectual property and confidential information continues even after employment ends. Additionally, you must be extremely mindful of the sensitive nature of trade secrets and confidential information acquired during prior employment. Accordingly, proprietary or confidential materials and information that you possess from a prior employer should not be disclosed, discussed or brought to Rocket. These obligations may include restrictions on the use and disclosure of confidential information, restrictions on the solicitation of former colleagues to work at Rocket and non-competition obligations.

## Safeguarding Our Organization

### Accuracy of Books and Records and Public Reports

Employees, officers and directors must honestly and accurately report all business transactions. You are responsible for the accuracy of your records and reports. Accurate information is essential to the Company’s ability to meet legal and regulatory obligations. All Rocket books, records and accounts will be maintained in accordance with all applicable regulations and standards and accurately reflect the true nature of the transactions they record. Rocket’s financial statements must conform to generally accepted accounting rules and the Company’s accounting policies. No undisclosed or unrecorded account or fund should be established for any purpose. No false or misleading entries should be made in Rocket’s books or records for any reason, and no disbursement of corporate funds or other corporate property should be

made without adequate supporting documentation. It is the policy of the Company to provide full, fair, accurate, timely and understandable disclosure in reports and documents filed with, or submitted to, the SEC and in other public communications.

It is your responsibility to report any concerns regarding questionable or fraudulent accounting or auditing matters or complaints regarding accounting, internal accounting controls or auditing matters.

## Records Retention

Company records must be maintained, stored and, when appropriate, destroyed in accordance with industry best practices, and in compliance with applicable laws and regulations. Under certain circumstances, such as litigation or governmental agency requests, Rocket may be required to preserve documents and information beyond their normal retention period. Never create, alter or destroy records or documents for the purpose of impeding the efforts of any investigation, litigation or government or regulatory agency investigation. All Rocket employees are expected to be familiar with the specific document retention requirements as relevant to the nature of their business activities. If a question arises as to your obligations, please contact your manager or the Compliance Officer.

## Media, Investor or Other Public Inquiries

Rocket is committed to discussing accurate information with the media, investors and other members of the public. Employees are not authorized to answer any questions or requests for information, whether formal or informal, from the media, an investor or any other public entity. Inquiries from investors should be directed to Investor Relations ([ir@rocketpharma.com](mailto:ir@rocketpharma.com)). Inquiries from media or general members of the public should be directed to Corporate Communications ([communications@rocketpharma.com](mailto:communications@rocketpharma.com)).

## Waivers and Approvals

Only the Board of Directors may waive any specific provision of this Code. In the event of an approved waiver involving the conduct of an executive officer or director, appropriate and prompt disclosure must be made to the Company's shareholders as required by applicable law and stock exchange rules.