

**CODE OF BUSINESS CONDUCT AND ETHICS
OF
VERADERMICS, INCORPORATED**

1. Introduction

This Code of Business Conduct and Ethics (“Code”) provides a general statement of the expectations of Veradermics, Incorporated (“Veradermics” or the “Company”) regarding the ethical standards that each director, officer and employee should adhere to while acting on behalf of the Company. You are expected to read, become familiar with, and act in accordance with the ethical standards described in this Code and other Company policies and procedures at all times, and will be required, from time to time, to affirm your agreement to adhere to such standards by signing the Compliance Certificate that appears at the end of this Code (or such written or electronic format as may be specified by the Company).

We are proud of what Veradermics has accomplished to date, and are seeking your commitment to continued excellence as our company changes and grows through the years. We expect all individuals associated with the Company to conduct themselves with the highest degree of honesty and integrity at all times.

We consider any violation of this Code to be a serious breach of our trust, and any violation will result in disciplinary action, up to and including termination. Similarly, if you are aware of someone’s violation of this Code, you have a duty to report the violation in accordance with the procedure detailed below. We depend on your commitment to protect our culture and values and will view your reporting of violations in that context.

This Code defines the general standards that you are expected to follow. While this Code covers multiple scenarios and activities, this Code cannot possibly address every challenging situation that could arise. Therefore, if you are faced with an issue that you feel may not be covered specifically by this Code, and are making a decision to act, please keep the following in mind:

- Consider whether your actions would conform with the intent of this Code;
- Consider whether your actions could create even a perception of impropriety;
- Make sure you have all of the relevant facts;
- Consider discussing the matter with your supervisor; and
- Seek help. It is always better to seek assistance before you act, rather than making a preventable mistake.

Many of the concepts described in this Code are further explained in the Company’s policies and procedures and/or in your Veradermics, Incorporated Employee Handbook. Any questions regarding this Code, or questions of ethics or appropriate business conduct not covered by this Code or other Company policies, should be directed to the Company’s General Counsel.

2. Reporting Violations and Government Investigations

If you know or reasonably believe that there has been a violation of this Code or other Company policies and procedures, or any other illegal or potentially illegal behavior, you must report the violation to any one of the following: the Whistleblower Hotline (as further described

in the Company's Whistleblower Policy), your direct supervisor, your direct supervisor's manager, the Company's General Counsel, or the Chief Financial Officer.

Any supervisor who obtains information about any such violation or behavior has the responsibility to report the matter immediately as described above. An employee who makes a report in good faith will not be retaliated against or otherwise discriminated against in the terms and conditions of his or her employment.

Further, you must promptly notify the General Counsel of any government investigations, inspections or inquiries from government agencies concerning the Company and cooperate as directed. You must not obstruct the collection of information, data or records that the Company is required to provide to the government during an inspection, investigation or request for information. You must not lie to government investigators or make misleading statements, nor may you attempt to cause any Company personnel to fail to provide accurate information to government investigators.

3. Personal Responsibility and Integrity

Conflicts of Interest

Directors, officers and employees should avoid activities which create or give the appearance of a conflict of interest between their personal interests and the Company's interests. A conflict of interest exists when a personal interest or activity of an employee could influence or interfere – or be perceived by others as influencing or interfering – with that person's performance of duties, responsibilities or commitments to the Company. Directors and officers should report any potential conflicts of interest to the General Counsel. Employees should report any potential conflicts of interest to their direct supervisors, who should review and adopt measures to mitigate disclosed matters. Any potential or actual conflicts that arise will be addressed in accordance with Company policies and procedures. Below are some examples which could result in a conflict of interest:

- Being a consultant to, or a director, officer or employee of, or otherwise operate an outside business that is a significant competitor or supplier of the Company;
- Having significant financial interest, including direct stock ownership, in any outside business that does or seeks to do a material amount of business with the Company;
- Seeking or accepting any personal loan or services from any such outside business, except from financial institutions or service providers offering similar loans or services to third parties under similar terms in the ordinary course of their respective businesses;
- Being a consultant to, or a director, officer or employee of, or otherwise operating an outside business if the demands of the outside business would materially interfere with the director's, officer's or employee's responsibilities with the Company;
- Conducting business on behalf of the Company with immediate family members, which include spouses, children, parents, siblings and persons sharing the same home whether or not legal relatives; or

- Taking personal advantage of opportunities that are presented to you or discovered by you as a result of your position with the Company or through your use of corporate property or information, thereby depriving the Company of an opportunity for benefit.

For avoidance of doubt, a director affiliated with a venture capital firm or other investor shall not be considered to have a conflict of interest due to such venture capital firm, other investor or the director acting on its behalf conducting normal activities.

This Code should be read in conjunction with the Company's Director Conflicts of Interest Policy, which provides guidance to help directors manage potential conflicts of interest.

Proper Use of Corporate Assets

The Company's assets shall be used for their intended business purposes. Personal use of the Company's funds or property, including charging personal expenses as business expenses, inappropriate reporting or overstatement of business or travel expenses, inappropriate usage of Company equipment or the personal use of supplies or facilities without advance approval from an appropriate officer of the Company shall be considered a breach of this Code.

Fair Dealing

Directors, officers and employees should endeavor to deal honestly, ethically and fairly with the Company's customers, suppliers, service providers, consultants, competitors and other persons with whom the Company conducts business. Statements regarding the Company's product candidates must not be untrue, misleading, deceptive or fraudulent. You must not take unfair advantage of the Company's customers, suppliers, service providers, consultants, competitors and other persons with whom the Company conducts business through improper manipulation, abuse of privileged or confidential information, concealment or misrepresentation of material facts or any other unfair-dealing practice.

Corporate Opportunities

Except as otherwise provided in the Company's organizational documents, all directors, officers, and employees owe a duty to the Company to advance its legitimate interests when the opportunity arises. Directors, officers and employees are prohibited from taking for themselves personally (or for the benefit of friends or family members) opportunities that are discovered through the use of Company assets, property, information or position at the Company, except as otherwise provided in the Company's organizational documents. Directors, officers and employees may not use Company assets, property, information or position for personal gain (including gain of friends or family members). In addition, except as otherwise provided in the Company's organizational documents, no director, officer or employee may compete with the Company.

4. Legal Requirements

Regulatory Compliance

The Company is committed to compliance with all laws and regulations in localities, cities, states, regions and countries in which we operate. We recognize the fact that, as participants in the biopharmaceutical industry, we work in a heavily regulated industry, and are subject to a wide range of laws, rules and regulations, including but not limited to those related to

the research, commercialization and marketing of pharmaceutical products, bribery, fair competition and healthcare “fraud and abuse.” Adherence to regulatory compliance principles and procedures is among our highest priorities.

Scientific and Clinical Research

We have a goal of developing product candidates of the highest quality possible. We also are sensitive to the special considerations involved in conducting scientific and clinical research. We are committed to complying with applicable law as well as the highest ethical, medical and scientific standards in conducting our research activities. We seek to conduct our research activities in accordance with all applicable laws, regulations, regulatory guidance and recognized industry standards including Good Clinical Practices, Good Laboratory Practices and Good Manufacturing Practices. Therefore, we have developed policies and procedures to ensure that this research is conducted effectively, compliantly and with respect for the research participants involved.

The Company 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. The Company registers and submits information about the clinical trials it conducts and sponsors on a publicly available database as required by law. Further, the Company strives to present and publish the results of clinical trials that it conducts or sponsors in a timely manner and seeks the same commitment from the clinical investigators with whom it collaborates, regardless of outcome.

Business Gifts and Interactions

It is against Company policy for a Company director, officer or employee to offer anything of value to any person with whom we do or may do business if that offer would inappropriately influence that person to conduct business with the Company. Generally, giving or receiving gifts (including discounts, coupons and other offers not available to the public in general), meals, travel, lodging entertainment or anything else of value as part of our external business relationships should meet all of the following criteria:

- They do not violate applicable law or Company policy;
- They do not constitute a bribe, kickback or other improper payment;
- They have a valid business purpose;
- They are appropriate as to time, place, value (modest; not lavish or extravagant);
- They are infrequent;
- They do not influence or appear to influence the behavior of the recipient; and
- If they are a gift, have a value of less than \$100.

Stricter standards apply to gifts or other value provided to government officials and to healthcare professionals and others in the healthcare industry.

This Code should be read in conjunction with the Company’s Gift and Entertainment Policy.

Product Communications

We are committed to compliance with all laws and regulatory requirements to ensure that we do not inappropriately promote the use of any of our products or product candidates. Neither the Company, nor any of its directors, officers, or employees may promote or market any product candidate prior to regulatory approval. In addition, all communications regarding our products and product candidates must be truthful and non-misleading and otherwise comply with applicable laws and regulations.

Interactions with Healthcare Professionals

Interactions with physicians, other healthcare professionals, institutional providers, patients and others in the healthcare industry may raise specific concerns about inappropriate influence. Recognizing this concern, the Company supports and acknowledges the standards and guidelines established by industry and professional groups applicable to our relationships with healthcare professionals and applicable to a pre-commercial company such as ours, including but not limited to PhRMA's Code on Interactions with Healthcare Professionals (a copy of which is available at <https://phrma.org/Codes-and-guidelines/Code-on-Interactions-with-Health-Care-Professionals>) and is committed to being compliant with all healthcare "fraud and abuse" laws. Fraud and abuse laws generally seek to ensure that clinical decisions are not improperly influenced by financial gain and to protect government funds by restricting financial interactions. Company policy imposes stricter standards for transfers of value involving healthcare professionals. In general, any payment or benefit provided to a healthcare professional must comply with the following standards:

- Gifts and entertainment may not be provided; only certain educational gifts are permitted;
- Any meals provided should be occasional, modest, in appropriate settings, incidental to an informational presentation or business discussion and provided only to healthcare professionals or staff with a legitimate need to participate in the discussion;
- All value must be provided pursuant to a legitimate business transaction, such as consulting or research services, and be accurately documented, transparent and reported as necessary to comply with applicable legal requirements;
- Value should never be provided as an inducement for a healthcare professional to recommend the Company's products or as a reward for purchases or recommendations of the Company's products; and
- The Company should not pay more than fair market value for services.

Bribery

It is also against Company policy and the U.S. Foreign Corrupt Practices Act ("FCPA") for Company directors, officers or employees to pay or offer to pay anything of value to foreign government officials or foreign government employees to obtain or retain business for the Company or to secure an improper commercial advantage. Indirect payments, including those to agents or third parties, with the knowledge that at least a portion of the payment will be given to a government official for an illegal purpose, are also prohibited. Additionally, the FCPA's

accounting provisions make it illegal to improperly document payments and expenses. Company directors, officers or employees should never try to conceal or misrepresent the true nature of a payment or expense.

This Code should be read in conjunction with the Company's Anti-Corruption Compliance Policy.

Reporting Safety Events

We are committed to complying with all applicable laws and regulatory requirements regarding the safety of our products and product candidates. Employees who become aware of any potential adverse event or safety concern related to our products and product candidates must promptly (within 24 hours of receiving information about the event) report such information in accordance with Company policy and applicable regulatory requirements, even if the employee is not certain whether there is a causal relationship between the use of the product or product candidate and the event.

Confidentiality and Data Privacy

Confidential information generated and gathered in the Company's business plays a vital role in the Company's business, prospects and ability to compete. "Confidential information" includes, without limitation, all non-public information that might be of use to competitors or harmful to the Company or its strategic partners if disclosed. Directors, officers and employees may not disclose or distribute the Company's confidential information, except when disclosure is authorized by the Company or required by applicable law, rule or regulation or pursuant to an applicable legal proceeding, as directed by the General Counsel. Directors, officers and employees shall use confidential information solely for legitimate Company purposes. Directors, officers, and employees must return all of the Company's confidential and/or proprietary information in their possession to the Company when they cease to be employed by or otherwise to serve the Company.

Further, the Company respects the privacy of its current, former and prospective employees, suppliers, and others with whom we interact, including healthcare professionals, patients and research subjects. In the course of conducting our business and research, Company representatives may have access to personal information of such individuals. Personal information includes data that can be used to directly or indirectly identify an individual, such as name, contact information and health-related information. Company representatives will access, use, transmit, store and dispose of personal information in a safe and secure way and in accordance with applicable laws and regulations, as well as applicable Company policies and procedures.

If you believe that personal information or confidential information held by the Company has been lost, stolen, or disclosed to or accessed by an unauthorized person, or that the Company's use of such information does not comply with applicable privacy and data protection laws, please report it immediately to your manager, Human Resources, Compliance, or Legal.

This Code should be read in conjunction with the Company's Regulation FD Policy, which is designed to comply with the Securities and Exchange Commission's Regulation Fair Disclosure.

Inside Information

While at the Company, you may also come into contact with another form of information that requires special handling and discretion. Inside information is material non-public information about the Company or another company that, if made public, would affect the price of a company's securities. Employees must never use inside information to obtain any type of personal advantage. For further discussion on our policy with respect to inside information, please review the Company's Insider Trading Policy.

Public Company Disclosure Obligations

The Company's business affairs are also subject to certain internal and external disclosure obligations and recordkeeping procedures. As a public company, we are committed to abiding by our disclosure obligations in a full, fair, accurate, timely and understandable manner. Only with reliable records and clear disclosure procedures can we make informed and responsible business decisions. When disclosing information to the public, it is the Company's policy to provide consistent and accurate information. To maintain consistency and accuracy, specific Company spokespersons are designated to respond to questions from the public. Only these individuals are authorized to release information to the public at appropriate times, unless otherwise set forth in applicable Company policies. All inquiries from the media or investors should be forwarded immediately to the Chief Executive Officer, Chief Financial Officer, Head of Investor Relations or other individuals designated by the Chief Executive Officer or their designee. The Chief Executive Officer, Chief Financial Officer or the General Counsel or their designee must approve all press releases, speeches, publications or other official Company disclosures in advance.

Our internal control procedures are further regulated by the Sarbanes-Oxley Act of 2002. The Sarbanes-Oxley Act was a U.S. legislative response to events at public companies involving pervasive breakdowns in corporate ethics and internal controls over financial reporting. It was designed to rebuild confidence in the capital markets by ensuring that public companies are operated in a transparent and honest manner. Ensuring proper and effective internal controls is among the Company's highest priorities.

We take seriously the reliance our investors place on us to provide accurate and timely information about our business. In support of our disclosure obligations, it is our policy to always:

- Comply with generally accepted accounting principles;
- Maintain a system of internal accounting and disclosure controls and procedures that provides management with reasonable assurances that transactions are properly recorded and that material information is made known to management;
- Maintain books and records that accurately and fairly reflect transactions; and
- Prohibit establishment of material undisclosed or unrecorded funds or assets.

5. Amendments and Waivers of This Code

The Company does not typically grant waivers of any Code provision but may grant a waiver in limited and compelling circumstances. Please contact the General Counsel if you believe that a waiver under a provision of this Code is warranted. Approval by the General Counsel and Chief Executive Officer is required to grant a waiver hereunder with respect to Company employees other than officers. The Board of Directors or the Audit Committee of the

Board of Directors must approve a waiver for any director or officer, and such waiver must be promptly disclosed to the public as required by law or the New York Stock Exchange.

The Company reserves the right to amend any provision of this Code at any time, subject to approval by the Board of Directors.

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Effective: January 30, 2026

COMPLIANCE CERTIFICATE

I have read and understand this Code of Business Conduct and Ethics ("Code") of Veradermics, Incorporated. I will adhere in all respects to the ethical standards described in this Code. I further confirm my understanding that any violation of this Code will subject me to appropriate disciplinary action, which may include demotion or discharge.

I certify to Veradermics that I am not in violation of this Code (assuming, if this certificate is executed prior to the effective date of this Code, that this Code is effective at such time), unless I have noted such violation in a signed Statement of Exceptions attached to this Compliance Certificate.

Date: _____

By: _____

Name: _____

Title/Position: _____