

AMENDMENT TO CODE OF CONDUCT AND ETHICS EFFECTIVE SEPTEMBER 19, 2019

On September 19, 2019, the Board of Directors (the “Board”) of NeuBase Therapeutics, Inc. (“NeuBase”) amended and restated the Company’s Code of Ethics for Senior Executive and Financial Officers as the NeuBase Therapeutics, Inc. Code of Conduct and Ethics (the “Restated Code”) to, among other things: (i) expand the individuals to whom the Restated Code applies to include all directors, officers and employees of NeuBase; (ii) include procedures for the anonymous reporting of complaints and alleged non-compliance with the Restated Code; and (iii) include provisions relating to (a) the prohibition of trading in securities of NeuBase while in possession of material, non-public information, (b) confidentiality, (c) fair dealing, (d) use of corporate assets, (e) gifts and favors, (f) compliance with antitrust rules and regulations, (g) political contributions, (h) NeuBase’s policy against discrimination and harassment and (i) personal conduct and NeuBase’s social media policy. The Restated Code is a statement of certain fundamental principles, policies and procedures that govern NeuBase’s directors, officers and employees in the conduct of the NeuBase’s business and is not intended to, and does not, create any rights in any employee, customer, client, visitor, supplier, competitor, shareholder or any other person or entity.