



DISCLOSURE COMMITTEE CHARTER

This Charter of the Disclosure Committee (the “Committee”) has been established by the Audit Committee of the Board of Directors of Rockwell Medical, Inc. (the “Company”).

I. RESPONSIBILITIES

The Committee shall assist the Chief Executive Officer and the Chief Financial Officer (together, the “Senior Officers”) in fulfilling their responsibility for oversight of the accuracy, completeness and timeliness of the disclosures made by the Company to its shareholders and the investment community. In doing so, the Committee shall have the following responsibilities, subject to oversight of the Senior Officers:

- Design and establish controls and other procedures that are designed to ensure that (i) information required to be disclosed by the Company in periodic and current reports to the Securities and Exchange Commission (the “SEC”) and other written information that the Company will disclose to the investment community is recorded, processed, summarized and reported accurately and on a timely basis, and (ii) information is accumulated and communicated to management, including the Senior Officers, as appropriate to allow timely decisions regarding such required disclosure (“Disclosure Controls and Procedures”).
- Monitor the effectiveness of the Company’s Disclosure Controls and Procedures.
- Review the Company’s (i) periodic and current reports, proxy statements, registration statements and any other information that the Company files with the SEC, and (ii) press releases containing financial information, earnings guidance, or other material information to the Company’s security holders (collectively, the “Disclosure Documents”) to ensure the accuracy and completeness of such Disclosure Documents.
- Evaluate the effectiveness of the Company’s Disclosure Controls and Procedures prior to the filing of the Company’s Annual Report on Form 10-K and each Quarterly Report on Form 10-Q (collectively, the “Periodic Reports”).
- Discuss with the Senior Officers all relevant information with respect to the Committee’s proceedings, the preparation of the Disclosure Documents and the Committee’s evaluation of the effectiveness of the Company’s Disclosure Controls and Procedures.
- Record minutes of all Committee meetings, and provide the Audit Committee with all meeting minutes and, at the request of the Audit Committee, all materials, exhibits and attachments reviewed in connection with the preparation and review

of each of the Company's periodic reports filed under the Exchange Act on Forms 10-K and 10-Q, as well as proxy statements and quarterly earnings releases.

- At the request of the Audit Committee, provide all materials, exhibits and attachments reviewed in connection with the preparation and review of each of the Company's periodic reports filed under the Securities Exchange Act of 1934 on Forms 10-K and 10-Q, as well as proxy statements and quarterly earnings releases.
- Before each periodic report on Form 10-K or Form 10-Q is filed, the Chairperson of the Disclosure Committee or his or her designee shall report to the Audit Committee regarding the Disclosure Committee's deliberations, activities, and disclosure recommendations on such filings.
- Evaluate the materiality of information and events relating to or affecting the Company, and determine the timing and appropriate method of disclosure of information deemed material.
- At least on a quarterly basis, the Disclosure Committee Chairperson shall prepare and submit to the Audit Committee a report regarding any concerns about actual or potential disclosure issues.

II. APPROVAL OF DISCLOSURE DOCUMENTS

Subject to appropriate review as described herein, the Committee will approve before their release all Disclosure Documents.

The Committee may designate two or more officers, at least one of whom shall be an attorney knowledgeable about SEC rules and regulations with respect to disclosure and at least one of whom shall be knowledgeable about financial reporting, who can, acting together, approve Disclosure Documents (other than Periodic Reports) when time does not permit the full Committee to meet. In the event the Company's General Counsel is unavailable, he or she may designate an attorney with an independent law firm to provide advice on his or her behalf.

III. ORGANIZATION

The membership of the Committee shall initially consist of the:

- Divisional Controller;
- Principal Accounting Officer;

- Vice President of Sales;
- Vice President of Operations;
- Vice President of Marketing;
- Sr. Vice President of Business Development;
- Chief Scientific Officer;
- Chief Medical Officer;
- Chief Development Officer;
- Senior Director of Regulatory & Quality;
- Vice President of Regulatory Affairs;
- Vice President of Compliance & Corporate Counsel; and
- External General Counsel.

The Senior Officers may add, replace or remove members from the Committee at any time and from time to time. The aforementioned officers listed above, or their equivalents, will participate as members of the Committee. The Senior Officers may participate in meetings of the Committee as they desire and will have full access to the information prepared for and by the Committee; however, they shall not serve as members of the Committee.

IV. CHAIRPERSON

The Vice President of Compliance & Corporate Counsel, or such other Senior Officers, shall serve as Chairperson of the Committee. The Chairperson shall be responsible for scheduling and presiding over meetings. The Chairperson must be a separate individual from the CEO and CFO.

V. SECRETARY

The Principal Accounting Officer, or such other member of the Committee who the Senior Officers may designate from time to time, shall serve as Secretary of the Committee. The Secretary shall be responsible for preparing agendas and meeting minutes.

VI. MEETINGS

The Committee shall meet as frequently as circumstances dictate to execute its responsibilities under this Charter, taking into account developments since the most recent Committee meeting, including changes in the Company's organization and business lines and any change in economic or industry conditions. In the event circumstances will not permit a meeting, review and approval may be obtained as provided for under Section II.

It is expected that meetings will occur in person; however, in certain circumstances, one or more members of the Committee may participate by telephone conference, with the same effect as though he or she were personally present.

VII. COMMITTEE RESOURCES

In discharging its duties, the Committee shall have full access to all Company books, records, facilities and personnel, including the internal auditors. External auditors and outside legal counsel may attend meetings of the Committee at the request of the Senior Officers, the Chairperson or the Secretary.

VIII. OTHER RESPONSIBILITIES

The Committee shall also have such other responsibilities as the Senior Officers may assign to it from time to time.

IX. CHARTER

The Committee will review and reassess this Charter from time to time and recommend any proposed changes to the Senior Officers for approval and to the Audit Committee of the Board of Directors for ratification. Further, the Committee will ensure that a copy of the Committee Charter is made available to the public through the Company's website.

X. INTERPRETATION OF CHARTER

Any question of interpretation of this charter or the Committee's procedures shall be determined by any Senior Officer or, in their absence from any meeting, the Chairperson.

Effective: November 1, 2020