

**SUPPLEMENT TO CODE OF CONDUCT AND ETHICS
FOR OUR SENIOR EXECUTIVE
AND SENIOR FINANCIAL OFFICERS**

This Supplement to our Code of Conduct and Ethics (collectively, with the Code, the "Code") has been created to meet the requirements of the Sarbanes-Oxley Act of 2002 and is an integral part of our Code. Reference should be made to the Code for additional provisions applicable to our Code of Conduct and Ethics.

This Supplement applies to Arrhythmia Research Technology, Inc.'s (the "Company's") executive officers, including the Chief Executive Officer, Chief Operating Officer, Chief Financial Officer, Controller and persons performing similar or senior executive functions, directors, sales, accounting and other technical personnel of the Company, including those of our subsidiary(ies) (collectively, "Employees"). We expect all of our Employees (as defined in the Code) to act in accordance with the highest standards of professional integrity in all aspects of their business activities, to comply with all applicable laws, rules and regulations, to deter wrongdoing and abide by the Company's Code of Conduct and Ethics as well as other policies and procedures adopted by the Company that govern the conduct of our Employees. Because of your leadership positions, you are setting an example for the rest of our Employees and are expected to comply with this Code to foster a culture of integrity and honesty in all our dealings.

1. Financial Reporting

The Company's senior financial officers (namely, principal financial officer, principal accounting officer, controller and any person performing similar functions) as well as any person whose responsibilities include financial reporting duties ("Finance Personnel") have a heightened obligation to perform their duties in a diligent, honest and ethical manner. This duty of honesty extends to the full, fair, accurate, timely and understandable disclosure of information relating to the Company's financial condition and results of operation in its periodic reports and compliance with all applicable government rules and regulations. The primary responsibility for financial reporting, internal control, and compliance with laws, regulation, and ethics rests with executive management, including our Finance Personnel.

All Company books, records and accounts shall be maintained in accordance with all applicable regulations and standards and accurately reflect the true nature of the transactions they record. The financial statements of the Company shall conform to generally accepted accounting rules and the Company's accounting policies. No undisclosed or unrecorded account or fund shall be established for any purpose. No false or misleading entries shall be made in the Company's books or records for any reason, and no disbursement of corporate funds or other corporate property shall 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 Securities and Exchange Commission and in other public communications.

Employees with concerns regarding questionable accounting or auditing matters or complaints regarding accounting, internal accounting controls or auditing matters may confidentially, and anonymously if they wish, submit such concerns or complaints in writing to the Company's Chairman of the Audit Committee of the Board of Directors, currently Mr. E. P. ("Lou") Marinos, at 2901 Seargent Street, Seabrook, Texas.

Examples of information which should be reported include but are not limited to: (i) internal control deficiencies such as failure to conduct quarterly reviews of those controls, or control overrides (such as situations in which Company officials responsible for a certain function have avoided performing such function or their decisions are overridden); (ii) fraud by management or by Employees with significant roles in financial reporting or internal controls (regardless of materiality); (iii) utilization of

proprietary Company information by non-Company personnel for the benefit of persons or entities other than the Company; and (iv) provision of non-auditing services by the Company's auditors without the prior consent of the Company's Audit Committee.

If Finance Personnel discover, or have reason to believe, that there is an actual or potential conflict of interest between their personal and professional relationships, they must report this information in a prompt fashion to the Chairman of the Audit Committee of the Board.

The Company's Audit Committee has important oversight responsibilities that relate to the Company's financial reporting, internal controls, compliance with applicable laws and regulations and Company ethics. In this capacity, the Audit Committee has the power to authorize investigations that are within the scope of its responsibilities, including conducting interviews or discussions with Employees and other persons whose views may be helpful to them. In its oversight capacity, the Audit Committee also monitors internal control processes by reviewing reports issued by external auditors and other information to gain reasonable assurance that the Company is in compliance with pertinent laws and regulations, is conducting its affairs ethically, and is maintaining effective controls against conflict of interest and fraud. If you have any concerns regarding the Company's financial reporting, internal controls, compliance with applicable laws and regulations and compliance of Company Employees with this Code, you should contact the Chairman of the Audit Committee directly.

The Audit Committee will evaluate the merits of any concerns or complaints received by it and authorize such follow-up actions, if any, as it deems necessary or appropriate to address the substance of the concern or complaint. The Company will not discipline, discriminate against or retaliate against any employee who reports a complaint or concern, unless it is determined that the report was made with knowledge that it was false.

2. Dealing with Independent Auditors

No Employee shall, directly or indirectly, make or cause to be made a materially false or misleading statement to an accountant in connection with (or omit to state, or cause another person to omit or state, any material fact necessary in order to make statements made, in light of the circumstances under which such statements were made, not misleading to, an accountant in connection with) any audit, review or examination of the Company's financial statements or the preparation or filing of any document or report with the SEC. No Employee shall, directly or indirectly, take an action to coerce, manipulate, mislead or fraudulently influence any independent public or certified public accountant engaged in the performance of an audit or review of the company's annual statements.

3. Integrity of Company Records

Financial Information and Records

To ensure that public companies such as the Company disclose complete and accurate financial information in their periodic reports, federal securities laws require the Company's Chief Executive Officer and Chief Financial Officer to certify that: (i) they have reviewed each periodic report; (ii) based on their knowledge, there are no materially false statements or material omissions in the subject periodic report; (iii) the report fairly presents the issuer's financial condition and results of operations; (iv) the signing officers are responsible for establishing and maintaining effective internal controls and have evaluated the effectiveness of those controls as required; (v) they have presented their conclusions about the effectiveness of the controls in the subject report; (vi) they have disclosed control deficiencies and any fraud by management or Employees with a significant role in internal controls (regardless of materiality) to the auditors and the Audit Committee; and (vii) they have disclosed any material weaknesses in

internal controls to the Company's auditors. In addition, all annual reports must include an internal control report concerning management's responsibility for establishing and assessing its internal control structure and procedures for financial reporting to which the Company's auditors must also attest and report. It is anticipated that additional requirements may be promulgated in the near future.

It is Company policy to comply with accepted accounting rules and controls at all times. All Company records must accurately reflect the transactions they record. In particular, this policy includes the following:

- No undisclosed or unrecorded fund or asset of the Company shall be established for any purpose;
- No false or misleading entries shall be made in the books or records of the Company for any reason and no Employee shall assist in any arrangement that results in any such entry;
- No payment or expenditure of the Company shall be approved without adequate supporting documentation or made with the intention or understanding that any part of such payment or expenditure is to be used, directly or indirectly, for any purpose other than that expressly described by the supporting documentation;
- Any Employee having information concerning any unrecorded fund or asset or any prohibited act shall promptly report such matter to the Chairman of the Audit Committee;
- Medical claims of Employees contain confidential information. Such claims shall be treated in a manner to retain that confidentiality and in a manner consistent with Company policy and procedures; and
- The Company's internal and outside accountants must maintain all audit and review work product for five (5) years from the end of the applicable fiscal period.

In addition, every Employee should be aware that:

- It is a crime, punishable by imprisonment of up to ten (10) years, to knowingly and willfully violate the provisions of the Sarbanes-Oxley Act of 2002 regarding retention of corporate audit records;
- It is a crime, punishable by imprisonment of up to twenty (20) years, to knowingly alter, destroy, conceal, etc. records or documents with the intent to impede, obstruct, or influence a federal government investigation or case filed in bankruptcy, or in relation to or contemplation of any such matter or case;
- It is a crime, punishable by imprisonment of up to twenty (20) years, to "corruptly" alter, destroy, mutilate, or conceal records or documents with the intent to impair their integrity or availability in an official proceeding, or to otherwise obstruct, influence, or impede a proceeding (or attempt to do so); and
- It is a crime, punishable by imprisonment of up to ten (10) years, to knowingly, with the intent to retaliate, take any action harmful to a person for providing to a law enforcement officer any truthful information relating to the commission or possible commission of any federal offense.

You should contact the Chairman of the Audit Committee should you have any questions regarding the foregoing discussion.

Personnel Records

Personnel records are treated as confidential by the Company, unless otherwise required by law or permission to disclose their contents is given by an Employee. Notwithstanding the foregoing, the Company will confirm length of service and position held (and pay rate, when written permission is given

by the Employee) when contacted by a prospective lender to an Employee or by a prospective employer after an Employee's separation from the Company.

Information to Customers

It is the Company policy to provide technical information which is as accurate as possible in order to properly guide our own Employees and customers in the sales and use of our products and services. No false or inaccurate data shall knowingly be recorded or used by any Employee. Any Employee having information concerning any such false data being recorded or used shall promptly report such a situation to the Chairman of the Audit Committee.

Computer Usage/Software Licensing

It is the Company's policy to restrict access to the Company's technology and other resources, including but not limited to computers, hardware, software, e-mail, networks and firewalls that can be connected to other computers or to the Company network on premises or via remote access. Company technology also includes both intranet and internet/cloud based applications and communication equipment including office phones, mobile phones, tablets and other equipment like digital cameras. It is the Company policy to maintain compliance with software licensing requirements of our suppliers and vendors.

Users of the Company's technology resources must comply with all local, state and federal laws, including, but not limited to, laws regarding libel, harassment, privacy, copyright, infringement, theft and threats. For additional technology related matters please refer to the Company's Acceptable IT Use Policy.

**ARRHYTHMIA RESEARCH TECHNOLOGY, INC.
CODE OF CONDUCT AND ETHICS**

ACKNOWLEDGMENT

I have read the Arrhythmia Research Technology, Inc. Code of Conduct and Ethics Supplement to Code of Conduct and Ethics for our Senior Executive and Senior Financial Officers. I understand my responsibility to comply with the Supplement to Code of Conduct and Ethics and the process and consequences for dealing with violations thereof.

If I have any questions or concerns regarding conduct that may raise concern under this Code of Conduct and Ethics, I will immediately follow one of the procedures suggested in the Code and will notify my immediate supervisor and the Chairman of the Audit Committee of the Board of Directors.

Signature

Print Your Name

Date

Job Title