Modular Medical, Inc.
Amended and Restated Audit Committee Charter
(As of June 26, 2026)

Purpose

This Audit Committee Charter (this "Charter") specifies the scope of the responsibilities of the Audit Committee (the "Committee") of the board of directors (the "Board") of Modular Medical, Inc. (the "Company"). The purpose of the Committee is to oversee and monitor the Company's accounting and financial reporting processes, the audit of the Company's financial statements and systems of internal controls regarding finance and accounting, compliance with relevant legal and regulatory requirements, and the independent auditors' qualifications, independence and performance on behalf of the Board.

RESPONSIBILITIES

The Board recognizes that the Company's management is responsible for preparing the Company's financial statements and implementing internal controls and that independent auditors are responsible for auditing those financial statements. In fulfilling these responsibilities, management and the independent auditors are ultimately accountable to the Committee and the Board.

Nothing in this Charter should be construed to imply that the Committee is required to provide or does provide any assurance or certification as to the Company's financial statements or as to its compliance with laws, rules or regulations. In order to fulfill its oversight responsibility, the Committee must be capable of conducting free and open discussions with management, internal and independent auditors, employees and others regarding the quality of the financial statements and the system of internal controls.

The specific duties of the Committee are to:

Independent Auditors

1. In the sole judgment of the Committee, select and retain an independent registered public accounting firm to act as the Company's independent auditors for the purpose of auditing the Company's annual financial statements, set the compensation of the Company's independent auditors, oversee the work done by the Company's independent auditors, and terminate and replace the Company's independent auditors, if necessary.

2. Select, retain, compensate, oversee and terminate, if necessary, any other registered public accounting firm engaged for the purpose of preparing or issuing an audit report or performing other audit, review or attest services for the Company.

3. Evaluate the auditor's independence by:

   a. requiring that the auditors annually submit to the Committee a formal written statement delineating all relationships between the auditors and the Company;

   b. actively engaging in a dialogue with the auditors with respect to any disclosed relationships or services that may impact their objectivity and independence, including the matters set forth in the written disclosures and the letter from the auditors required by applicable requirements of the Public Company Accounting Oversight Board ("PCAOB");

c. reviewing and discussing with the Board any relationships between the auditors and the Company, or any other relationship, that may adversely affect independence, and reviewing and approving any significant management consulting engagements proposed to be undertaken by such auditors on behalf of the Company; and

d. recommending that the Board take appropriate action in response to the auditors' report to satisfy itself of their independence.

4. Annually review the auditors' proposed audit plan and approach, including staffing and timing of the audit and related matters.

5. Review and discuss with the auditors: (a) the auditors' responsibilities under generally accepted auditing standards and the responsibilities of management in the audit process; (b) the overall audit strategy; (c) the scope and timing of the annual audit; (d) any significant risks identified during the auditors' risk assessment procedures; and (e) when completed, the results, including significant findings, of the annual audit.

6. Approve all audit engagement fees and terms and pre-approve all auditing services and permitted non-auditing and tax services that may be provided by the auditors or other registered public accounting firms (other than non-audit services falling within the *de minimus* exception set forth in Section 10A(i)(1)(B) of the Securities Exchange Act of 1934, as amended (the "Exchange Act") and non-audit services that the independent auditors are prohibited from providing to the Company), in accordance with the following guidelines:

a. pre-approval policies and procedures are established by the Committee and must be detailed as to the particular services provided;

b. the Committee must be informed about each service; and

c. the Committee may delegate pre-approval authority to one or more of its members, who shall report to the full committee, but shall not delegate its pre-approval authority to management.

7. Obtain from management, review and approve a description of issues and responses whenever a second opinion is proposed by management to be sought from another outside accountant.

8. Take, and require that the Company's senior management take, timely and appropriate remedial actions in response to any report or information submitted by the independent auditors pursuant to Section 10A(b) of the Exchange Act.

9. Review and discuss with the auditors: (a) all critical accounting policies and practices to be used in the audit; (b) all alternative treatments of financial information within generally accepted accounting principles ("GAAP") that have been discussed with management, the ramifications of the use of such alternative treatments and the treatment preferred by the auditors; and (c) other material written communications between the auditors and management.

10. Review with management and the auditors any major issues regarding accounting principles and financial statement presentation, including any significant changes in the Company's selection or

application of accounting principles, any significant financial reporting issues and judgments made in connection with the preparation of the Company's financial statements, including the effects of alternative GAAP methods, and the effect of regulatory and accounting initiatives and off-balance sheet structures on the Company's financial statements.

11. Communicate to the auditors the Committee's understanding of the Company's relationships and transactions with related parties that are significant to the Company, and review and discuss with the auditors the auditors' evaluation of the Company's identification of, accounting for, and disclosure of its relationships and transactions with related parties, including any significant matters arising from the audit regarding the Company's relationships and transactions with related parties.

12. Review and discuss with the auditors any other matters required to be discussed by applicable requirements of the PCAOB and the Securities and Exchange Commission (the "Commission").

Financial Statements

13. Conduct a post-audit, pre-issuance review of the Company's annual financial statements, the auditors' opinion thereon, and any significant difficulties or disagreements with management encountered during the course of the audit.

14. Discuss the annual financial statements with the appropriate officers and/or employees of the Company and with the auditors.

15. Discuss with the auditors the matters required to be discussed by relevant auditing standards, including the quality, clarity and reasonableness, and not just the acceptability, of the accounting principles, significant judgments, and underlying estimates and assumptions used in the statements, as well as additional matters reported by the independent auditors pursuant to Section 10A(k) of the Exchange Act.

16. When appropriate, recommend to the Board that the annual financial statements be included in the Company's annual report on Form 10-K.

17. Prepare a report to the stockholders of the Company in each proxy statement, as required by the rules of the Commission.

18. Review with the Company's financial management and the independent auditors the schedule of any unrecorded adjustments to the Company's financial statements.

19. With regard to quarterly reports to the Commission on Form 10-Q, the chairperson of the Audit Committee and/or any member or members of the Committee whom he or she designates shall review with management and, to the extent necessary or appropriate, the independent auditors, the financial statements to be included in such filing prior to filing with the Commission.

20. Review, prior to publication or filing, and approve such other Company financial information, including appropriate regulatory filings and releases that include financial information, as the Committee deems desirable.

Internal Accounting and Control Functions

21. Review and discuss with management and the auditors the adequacy and effectiveness of the Company's internal accounting and financial controls, including any changes, significant deficiencies or material weaknesses in those controls reported by the auditors or management and any special audit steps

adopted or changes required in light of any material control deficiencies, any reports and certifications regarding internal control over financial reporting and any fraud, whether or not material, that involves management or other Company employees who have a significant role in the Company's internal controls.

22. Review and discuss with management the Company's major financial risk exposures, and the steps management has taken and proposes to take to monitor and control such exposures.

23. Review proposed future internal audit plans proposed by management.

24. Establish procedures for the receipt, retention and treatment of complaints received by the Company regarding accounting, internal accounting controls, or auditing matters and the confidential, anonymous submission by employees of the Company regarding questionable accounting or auditing matters.

Compliance and Governance

25. Review, approve and oversee any transaction between the Company and any related person (as defined in Item 404 of Regulation S-K) and any other potential conflicts of interest. In considering whether to approve any such transaction, the Committee will consider such factors as it deems appropriate, and generally focus on whether the terms of the transaction are at least as favorable to the Company as terms it would receive on an arm's-length basis from an unaffiliated third party and whether any such transaction might impair the independence of a director or present a conflict of interest for a director or executive officer.

26. Review inquiries and reports concerning violations by officers or directors of the Company's Code of Business Conduct and Ethics (the "Code") and conduct appropriate investigations in accordance with the policies and procedures set forth in the Code.

General

27. Periodically review this Charter and propose to the Board necessary or appropriate revisions.

AUTHORITY

The Committee and each of its members may communicate directly and/or privately with the Company's directors, officers, employees, consultants, agents, internal auditors, independent auditors, attorneys-in-fact, counsel (including inside and outside counsel) and advisors, and any and all third parties in the performance of the Committee's functions.

The Committee may cause an investigation to be made into any matter within the scope of its responsibilities under this Charter as the Committee deems necessary, or as otherwise requested by the Board. The Committee may require Company personnel to assist in any such investigation, and may engage independent resources to assist in such investigations as it deems necessary.

The Committee shall have the authority, in its sole discretion, to retain and obtain the advice and assistance of independent outside counsel and such other advisors as it deems necessary to fulfill its duties and responsibilities under this Charter. The Committee shall set the compensation, and oversee the work, of any outside counsel and other advisors. The Committee shall receive appropriate funding from the Company, as determined by the Committee in its capacity as a committee of the Board, for the payment of compensation to the Company's independent auditors, any other accounting firm engaged to perform services for the Company, any outside counsel and any other advisors to the Committee, as well as for any ordinary administrative expenses of the Committee that it determines are necessary or appropriate in carrying out its duties and responsibilities.

COMMITTEE MEMBERSHIP

The membership of the Committee shall consist of three or more directors, each of whom shall:

(i) have been appointed by the Board. The members of the Committee shall serve for such term or terms as the Board may determine or until earlier resignation or death. The Board may remove any member from the Committee at any time with or without cause;

(ii) be free of any relationship that, in the opinion of the Board, may interfere with the exercise of independent judgment as a Committee Member;

(iii) must be able to read and understand fundamental financial statements, as such qualification is interpreted by the Board in its discretion. At least one member of the Committee must have past employment experience in finance or accounting, requisite professional certification in accounting or other comparable experience or background that results in the individual's financial sophistication (a person who satisfies the definition of an "audit committee financial expert" within the meaning of Item 407(d)(5)(ii) of Regulation S-K will be presumed to have financial sophistication);

(iv) have not participated in the preparation of the Company's or any of its subsidiaries' financial statements at any time during the past three years; and

(v) otherwise meet the requirements of independence and other qualifications for membership on an audit committee as set forth in Section 10A(m)(3) of the Exchange Act and in the rules of the Nasdaq Stock Market or any other market or exchange on or through which the Company's securities may be traded (the "relevant listing authority"), as such rules may be amended from time to time.

The Board reserves all authority permitted under the rules of the Commission and the relevant listing authority in connection with any matter referred to in this Charter, including, but not limited to, the determination of independence of Committee members.

MEETINGS

The Committee shall meet as often as necessary to fulfill its functions as determined by the Committee, but no less than four times annually.

The Board shall designate a member of the Committee as the chairperson. The Committee shall report regularly to the Board on its discussions and actions, including any significant issues or concerns that arise at its meetings, and shall make recommendations to the Board, as appropriate.

The Committee shall meet separately, and periodically, with management and representatives of the auditors, and shall invite such individuals to its meetings as it deems appropriate, to assist in carrying out its duties and responsibilities. However, the Committee shall meet regularly without such individuals present.