

Code of Business Conduct and Ethics

This Code of Business Conduct and Ethics has been approved by the Board of Directors of Median Technologies on the 12th of December 2022

INTRODUCTION

Purpose and Scope

Median Technologies (hereinafter together with its subsidiaries, “Median” or the “Company”) is a French company duly incorporated in Grasse, with registered office at Les 2 Arcs, Bat B, 1800 route des Crêtes, 06560 Valbonne, listed on the stock exchange market Euronext Growth Paris.

The Board of Directors (the “**Board**”) of Median established this Code of Business Conduct and Ethics (the “**Code**”).

The purpose of this Code is to guide and direct the Company’s business and operations towards compliance with ethical standards, therefore, this Code shall be binding upon the shareholders, all directors and independent auditors, all its employees, including the top management, as well as those who, despite not being employed by the Company, operates directly or indirectly for the same e.g agents, collaborators in any capacity, consultant, suppliers, business partners ... (“**Covered Persons**”). Ethical standards and rules are essential in the course of the Company’s business.

The Board is responsible for administering this Code. The Board has delegated daily responsibility for administering and interpreting this Code to the Legal Department. Our Legal Director has been appointed as our Legal Compliance Officer under this Code.

All Covered Persons must conduct themselves according to the language and spirit of this Code, exercise reasonable judgment when conducting the Company’s business and seek to avoid even the appearance of improper behavior. The Company encourages Covered Persons to refer to this Code frequently to ensure that they are acting within the spirit of this Code. While covering a wide range of business practices and procedures, the standards set forth in this Code cannot and do not cover every issue that may arise, or every situation where ethical decisions must be made, but rather set forth key guiding principles that represent Company policies and establish certain conditions for employment and service at the Company. In uncertain situations, or if you otherwise have questions or concerns about this Code, we encourage you to speak openly with your supervisor (if applicable) or, if you are uncomfortable doing that, with the Legal Compliance Officer under this Code.

Covered Persons are notified that this Code shall be attached to the internal rules (règlement intérieur) of the Company. It’s the duty of all directors and executives to promote the values and principles enshrined in the Code and everyone’s duty to commit to observe the laws and regulations in force in all countries where the Company operates. Each employee is required to contribute to the implementation of this Code and shall certify in writing that they have read and intend to comply with this Code and complete the acknowledgment attached hereto as Appendix A.

Company core values

1. **Leading innovation with purpose:** Median brings innovation to the oncology drug development process and to the treatment pathways for patients with cancer. Median delivers innovative imaging technology and software based on the latest science and industry need – ultimately contributing to a healthier world. Median combines the spirit of innovation with its passion and conviction to help cure cancer and other debilitating diseases through the analysis of medical images.
Median fosters a work environment where thinking out of the box is encouraged and rewarded in order to create innovative, cost-effective, sustainable solutions that provide value to Median, its customers and patients.
2. **Supporting its customers in achieving their goals:** Median listens to the needs of its customers and aim to meet their expectations through innovation, imaging expertise, superior services and quality solutions resulting in value to the customer and the Company.
The customers' goals are Median's goals. Median strives to be proactive, responsible, and accountable for what Median says and does and delivers as promised.
3. **Committing to quality in all Median does:** Median is dedicated to quality in everything Median does. Quality begins with Median and Median is committed to it. Median cultivates excellence through the way Median develops its products, delivers its services, carries out its standard practices and training, and utilizes its expertise and technology.
Median holds itself and each other accountable and expects every employee to strive for excellence in all endeavors.
4. **Putting the patient first:** There can be no greater satisfaction than helping to save or improve the lives of millions of people with life-threatening diseases. Median knows that there is a person at the other end of the images Median analyzes who is counting on the Company to do everything it can to help make them healthier.
Median has embraced the promise of precision medicine and Median is part of it. Median knows that its imaging technology plays a central role in better understanding disease at the individual patient level, enabling clinicians to deliver personalized therapies – the right treatment, for the right patient at the right time.

Contents Structure of this Code

This Code has two sections that follow this Introduction.

- The first section, “**Standards of Conduct**,” contains the actual guidelines that Covered Persons are expected to adhere to in the conduct of the Company's business.
- The second section, “**Compliance Procedures**,” contains specific information about the procedures for implementing, disseminating and supervising this Code.

A Note About Other Obligations

Covered Persons generally have other legal and contractual obligations to the Company. This Code is not intended to reduce or limit the other obligations that any Covered Person may have to the Company. Instead, the standards in this Code should be viewed as *minimum standards* that Median expects Covered Persons to adhere to in the conduct of the Company's business.

STANDARDS OF CONDUCT

Compliance with Laws, Rules and Regulations

The Company seeks to conduct its business in compliance with the applicable laws, rules and regulations in the jurisdictions where it operates and does business. No Covered Person shall engage in any unlawful activity in conducting the Company's business or in performing his or her daily Company's duties, nor shall any Covered Person instruct others to do so, for any reason.

All Covered Persons must act in the strict respect of applicable local, national and international laws as well regulatory and good practice requirements. It is, therefore, a duty of each Covered Person to operate within legal guidelines and cooperate with local, national and international authorities. Covered Persons are expected to comply with the applicable laws in all countries to which they travel, in which they operate and where the Company otherwise operates and does business, including laws prohibiting bribery, corruption or the conduct of business with specified individuals, companies or countries.

Honest and Ethical Conduct

It is the Company's policy to promote high standards of integrity by conducting its affairs in an honest and ethical manner. The integrity and reputation of the Company depends on the honesty, fairness and integrity brought to the job by each person associated with us. Unyielding personal integrity is the foundation of corporate integrity. Promoting honest and ethical conduct is the basis to ensure the Company complies with applicable rules and regulations of all French, and other governmental entities and other private and public regulatory agencies to which the Company is subject.

Conflicts of Interest

Covered Persons have an obligation to act in the best interest of the Company and Median expects all Covered Persons to be free from influences that conflict with the best interests of the Company or might deprive the Company of their undivided loyalty in business dealings.

A "**conflict of interest**" occurs when a Covered Person's personal interest interferes in any way, or even appears to interfere, with the Company's interests. Conflicts of interest may arise in many situations. For example, conflicts of interest can arise when a Covered Person takes an action or has an outside interest, responsibility or obligation that may make it difficult for him or her to perform his or her work responsibilities objectively and/or effectively. Conflicts of interest may also occur when a Covered Person or his or her immediate family member receives improper personal benefits as a result of the Covered Person's position with the Company. Each individual's situation is different and evaluating any particular

situation will require consideration of many factors.

Situations involving a conflict of interest may not always be obvious or easy to resolve. Any material transaction or relationship that reasonably could be expected to give rise to a conflict of interest shall be reported promptly to the Legal Compliance Officer. The Legal Compliance Officer may notify the Board or a committee thereof as he or she deems appropriate.

If you have any questions about a potential conflict or if you become aware of an actual or potential conflict, and you are not an executive officer or director of the Company, you should discuss the matter with your supervisor. If the supervisor is involved in the potential or actual conflict, you should discuss the matter directly with the Legal Compliance Officer.

Protection and Proper Use of the Company's Assets and Valuables

Loss, theft and misuse of the Company's valuables and assets has a direct impact on the Company's business and its profitability. Covered Persons are expected to take particular care in protecting Company valuables and assets that are entrusted to their care. Protecting Company's valuables and assets against loss, theft or other misuse is the responsibility of every Covered Person. Covered Persons are also expected to take steps to ensure that the Company's valuables and assets are only used for legitimate business purposes. In any event, the Covered Persons must refrain from using the Company's resources, valuables, assets, goods and materials for their own personal advantage or, in any event, for any unlawful purposes.

Protection of industrial and intellectual property rights

Median operates in full compliance with the legislation concerning the protection of trademarks, patents and other distinctive signs and copyright laws.

Median does not permit for use, for any reason and for any purpose, of products with counterfeit trademarks and signs and the manufacture or marketing or, in any case, any activity related to products already patented by third parties and over which it has no rights.

Median also prohibits the reproduction of programs and the content of databases, as well as the acquisition and dissemination – in any form- of protected intellectual property, including through the disclosure of the relevant content before it is made public.

Corporate Opportunities

Covered Persons owe a duty to the Company to advance its business interests when the opportunity to do so arises. Covered Persons are prohibited from:

- diverting to himself or herself or to others any opportunities that are discovered through the use of the Company's assets, property or information as a result of his or her position with the Company unless such opportunity has first been presented to, and rejected by, the Company;
- using the Company's assets, property or information or his or her position for improper personal gain; or
- competing with the Company, which may involve engaging in the same line of business as the Company or otherwise taking opportunities away from the Company.

Confidentiality

Confidential information generated and gathered in the Company's business is a valuable Company asset and plays a vital role in the Company's business, prospects and ability to compete. Protecting this information plays an important role in the Company's continued growth and success.

"Confidential information" includes all non-public information that might be useful to competitors or that could be harmful to the Company, its customers, suppliers or partners, if disclosed. Intellectual property, such as trade secrets, patents, trademarks and copyrights, as well as business plans, research plans and strategies, pre-clinical and clinical data, new product plans, objectives and strategies, records, databases, salary and benefits data, employee information, customer, employee and supplier lists and any unpublished financial or pricing information must also be vigorously protected.

Covered Persons shall 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. Covered Persons shall use confidential information solely for legitimate business purposes. Covered Persons 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 to otherwise serve, the Company.

Unauthorized use or distribution of proprietary information violates Company policy and could be illegal. Such use or distribution could result in negative consequences for both the Company and the individuals involved, including potential legal and disciplinary actions.

Fair competition

The free market requires a level playing field with other companies which however must constantly follow the principles of fairness, fair competition and transparency towards market players.

Competing vigorously, yet lawfully, with competitors and establishing advantageous, but fair, business relationships with customers and suppliers is a part of the foundation for long-term success. However, unlawful and unethical conduct, which may lead to short-term gains, may damage the Company's reputation and long-term business prospects, and is strictly prohibited.

Accordingly, it is the Company's policy that Covered Persons must endeavor to deal ethically, fairly and lawfully with the Company's customers, suppliers, competitors and employees in all business dealings on the Company's behalf. In compliance with the national and EU legislation on antitrust matters, Median does not engage in conduct nor enters into agreements which may adversely affect the competition regime among various operators in the reference markets or such as to negatively impact users or consumers in general, thereby basing its conduct on fair trading, preventing and condemning malpractices of any kind.

Insider Trading

Using non-public, Company information to trade in securities, or providing a family member, friend or any other person with a "tip", is illegal. All such non-public information should be considered inside information and should never be used for personal gain. Each Covered Person is required to familiarize

itself and comply with the Company's "Insider Trading Policy," copies of which are distributed to all Covered Persons and available on the Company's website. Each Covered Person shall consult the Company's Insider Trading Policy for more specific information on the definition of "inside" information and on buying and selling the Company's securities or securities of companies with which Median does business.

Integrity of Records

The Company is committed to providing its shareholders, potential shareholders and stakeholders with full and accurate information about its financial condition and results of operations, as required by the competent securities laws and governmental authorities such as the French Autorité des Marchés Financiers ("AMF"). It is the Company's policy that the reports and documents it files with or submits to the competent authorities, and its earnings releases and similar public communications, shall include full, fair, accurate, timely and understandable disclosure. Those records serve also as a basis for managing Median's business and are important in meeting the obligations to customers, suppliers, creditors, employees and others with whom Median does business. As a result, it is important that Median's books, records and accounts accurately and fairly reflect, in reasonable detail, the assets, liabilities, revenues, costs and expenses, in accordance with the relevant accounting standards as well as all transactions and changes in assets and liabilities.

We require that each Covered Person shall comply with Median's system of internal controls and that all transactions be supported by appropriate documentation for legitimate purposes. Covered Person who are responsible for these filings and disclosures, including the Company's principal executive, financial and accounting officers, must use reasonable judgment and perform their responsibilities honestly, ethically and objectively in order to ensure that this disclosure policy is fulfilled. The Company's senior executive officers are primarily responsible for monitoring the Company's public disclosure.

The integrity, reliability and accuracy in all material respects of the Company's books, records and financial statements is fundamental to the Company's continued and future business success. No Covered Person may cause Median to enter into a transaction with the intent to document or record it in a deceptive misleading, fraudulent or unlawful manner. In addition, no Covered Person may create any false or artificial documentation or book entry for any transaction entered into by the Company.

Any Covered Person who becomes aware of any departure from these standards shall report his or her knowledge promptly to its supervisor or the Legal Compliance Officer.

Anti-Money Laundering and Combating of Financing of Terrorism

Median pursues the utmost transparency in business transaction and adopts all possible means to fight money laundering and the receipt of stolen goods. The Company prohibits all of the Covered Persons from engaging in any activity that facilitates money laundering or the funding of terrorist or criminal activities ("Prohibited Transactions") in connection with our business. The Company expects all of the Covered Persons to comply with all applicable laws and regulations regarding Prohibited Transactions. Median's objective is not to establish any relationship – neither of a professional or commercial nature – with entities involved in the terrorism, whether natural or legal persons, and also undertakes not to finance or facilitate any of their activity.

Anti-corruption

In accordance with national and international anti-corruption regulations, Median prohibits any form of payment or promise of money or other compensation (direct or indirect, including through third parties, such as contractors, partners, agents..) to public officials, representatives of political parties or government agencies aimed at influencing an act or a formal decision for the awarding or confirmation of a business activity.

The following conducts are strictly prohibited:

- Giving or offering, promising to give or offer, directly or indirectly, money and material benefits of any kind to domestic or foreign public officials, civil servants or government officials, to political exposed persons, their families and to the persons closely or clearly associated with them, in order to influence or remunerate an act of their office (so called “facilitation payments”) and/or the omission of an act of their office or the performance of actions contrary to their official duties;
- Offering gifts or other gratuities which may constitute forms of payment to officials or employees from the public administration, to politically exposed persons, their families and to the persons closely and clearly associated with them;
- Accepting and then fulfilling requests for money, favors or compensation from natural persons or legal persons who wish to enter into business relations with Median as well as from any entity that qualifies as a national or foreign public official or civil servant, from politically exposed persons, their families and the persons closely and clearly associated with them.

Median condemns all forms of corruption and considers it’s essential to ensure that all relations with private entities (suppliers, customers, consultants, business partners...) be based on the utmost loyalty, integrity, fairness and good faith. Median prohibits, also in its relation with private entities, practices of corruption, favoritism, collusion, direct/indirect solicitations including through promises of personal benefits.

Gifts

Gratuities such as gifts, are permitted only if they are of modest value and such as not to compromise the integrity or reputation of either party, or such that they cannot be interpreted by an impartial observer as being aimed at obtaining benefits in an improper manner.

Employees may accept unsolicited and non-recurrent gifts, other than money, that conform to the reasonable ethical practices of the marketplace, including:

- Flowers, fruit baskets and other modest presents that commemorate a special occasion.
- Gifts of nominal value, such as calendars, pens, mugs, caps and t-shirts (or other novelty, advertising or promotional items).

Offering Business Courtesies

Any employee who offers a business courtesy must assure that it cannot reasonably be interpreted as an attempt to gain an unfair business advantage or otherwise reflect negatively upon Median Technologies. An employee may never use personal funds or resources to do something that cannot be done with Median Technologies’ resources. Accounting for business courtesies must be done in accordance with

approved company procedures. We may provide non-monetary gifts (i.e., company logo apparel or similar promotional items) to our customers. Further, management may approve other courtesies, including meals, refreshments or entertainment of reasonable value, provided that:

- The practice does not violate any law or regulation or the standards of conduct of the recipient's organization.
- The business courtesy is consistent with industry practice, is infrequent in nature and is not lavish.
- The business courtesy is properly reflected on the books and records of Median Technologies.

Covered Persons must exercise particular care and vigilance when dealing with Healthcare professionals and must be familiar with the laws and regulations applicable to the work they do. Pursuant to French Decree no. 2016-1939 of December 28, 2016 ("Sunshine Regulations"), Median is committed to creating a relationship of trust with all of its partners, whether doctors, health authorities or governments, in order to guarantee long-lasting and transparent links and thus meet the high standards of integrity expected by patients and stakeholders, in accordance with the law of 29 December 2011 on "Strengthening the safety of medicines and health products" and its implementing decree n ° 2013-414 of 21 May 2013, known as the "Sunshine Act".

Media Inquiries

Median is a high-profile company in its line of business, and from time to time, employees may be approached by reporters and other members of the media. To ensure that Median speaks with one voice and provide accurate information about the company, each Covered Person shall direct all media inquiries to the Corporate Communications team. No one may issue a press release, or any other media communication (interviews, articles, videos) without first consulting with them.

Protection of Personal Data

Median collects, processes and uses personal data of various individuals, including its employees, customers, suppliers and partners to fulfil its operational activities. The Company is committed in protecting the privacy of its employees, customers, suppliers and partners. The Company complies with all applicable laws and regulations concerning how individual personal data is collected, processed and used.

Protection of the Environment

It is Median's policy to conduct its business in an environmentally responsible way that minimizes environmental impacts. Median attaches the utmost importance to environmental protection and consequently Median will not seek any advantage that may possibly be related to the violation of environmental legislation.

Workplace and safety

Median is fully committed to pursuing the objective of ensuring workplace and safety protection.

Median is taking the most appropriate measures to avoid the risks associated with the performance of its business activities. Median shall take all appropriate measures to ensure the protection of workers' health and safety.

Drug-free work place

Our policy is to provide a working environment free of the problems associated with the use and abuse of controlled substances or alcohol. The distribution, dispensing, possession or use of illegal drugs or other controlled substances, except for approved medical purposes, at any company office or site where company Covered Persons are engaged in work-related activities is strictly prohibited. In no event should any Covered Persons be under the influence of alcohol, illegal drugs or controlled substances (other than controlled substances approved for medical purposes) while present at any such office or site. Alcohol shall not be consumed on company premises except as authorized during company-sponsored events.

Value of Human Resources

Human Resources are the main factor underpinning the Company's development. The management of the human resources is based on respect for the personality and professionalism of each of them within the general framework of the applicable legislation.

Median is aware that the high professionalism of its employees and their dedication to the Company are essential and critical factors to the pursuit of the Company's objectives.

Median highly values the diversity of backgrounds, skills and abilities that a global workforce brings to our business. Median hires employees with sound character and judgment, whom Median trusts will act responsibly. The Company is committed to supporting diversity in its workforce and leadership, and to developing all the talent within its organization. The Company is committed in ensuring the equality and diversity for all employees in recruitment, training access, compensation, welfare, and career development.

Zero Tolerance for Discrimination and Harassment

Median is committed to treating its colleagues and job applicants with fairness and respect. Median's policies prohibiting discrimination, harassment and retaliation are global policies intended to create a workplace that promotes a positive and productive environment. Median believes in cooperation, teamwork and trust, which contribute to a positive work environment. Hostility and harassment are not tolerated.

Good Clinical Practices (GCP)

In all research initiatives worldwide, safety of the patients who take part in clinical trials will be ensured, by upholding the highest ethical, scientific and clinical standards, in compliance with Good Clinical Practice.

Information Security

Median is fully committed to ensure the security of its IT assets and the correct use of IT or telecommunication services, in compliance with the legislation currently in force and in order to guarantee the integrity and authenticity of the data processed, with a view of protecting the Company's interests and those of third parties. Median shall take appropriate measures to ensure that access to electronic and computerized data shall take place in full compliance with the applicable regulations and the privacy of the parties involved, if applicable.

Median prohibits the following conducts:

- Unlawful introduction into computer or telecommunication systems protected by security measures;
- Destruction, damage, cancellation or alteration of information, data or software belonging to others;
- Exhibition of false electronic documents having evidentiary effects;
- Removal, reproduction, distribution or unlawful delivery of codes, keywords or other means suitable to gain access to a computer or telecommunications system protected by security measures.

Internal controls

Median's policy is to disseminate, at all levels of the organization, not only a culture characterized by the existence and importance of a system of controls, but also to convey an approach towards the application thereof.

Through its internal systems of control, Median intends to pursue the general objectives of effectiveness and efficiency of its operations, protection of corporate property and resources, compliance with laws regulations and internal procedures, as well as reliability of accounting and financial data.