

## Perimeter Medical Imaging AI, Inc. Code of Conduct

### Introduction

All employees, officers, and directors of Perimeter Medical Imaging AI, Inc. are committed to conducting themselves and the affairs of the company with the highest ethical and moral standards. Each of the aforementioned individuals are accountable for conducting Perimeter's business with integrity and operating in compliance with all applicable laws and regulations.

As a publicly traded medical device company, the corporate values set forth in this Code of Conduct are an imperative for all employees, officers, and directors. Our actions with each other, with our shareholders, with our vendors, with our customers and with the various regulatory authorities are paramount to the success of the company and its business.

### Application

This Code applies to all employees, officers and directors of the company and its affiliates and subsidiaries worldwide. Adherence to this Code is a condition of employment with, or of providing services to the company.

### Policies

**Work Environment** – Perimeter and its employees, officers and directors are committed to a supportive, diverse, and inclusive work environment where all employees can reach their full potential. The company will maintain a workplace that is safe, free of substance abuse, and free of discrimination and harassment in any form including race, religion, sex, sexual orientation, age, national origin and/or citizenship. Employees will not engage in any intimidating, threatening, disruptive or violent behavior.

**Legal, Regulatory and Policy Compliance** – All employees, officers and directors will conduct the company's business in compliance with:

1. all relevant and applicable laws, statutes, and regulations;
2. all regulatory bodies and authorities relative to its products, business practices and Standard Operating Procedures (SOP's);
3. this Code; and
4. all other company policies which may address any of the expectations addressed herein in more detail

**Conflicts of Interest** – Employees, officers and directors must avoid any situation that may involve a conflict between their personal interests and the interests of the company. This applies to contractors, vendors, potential and existing customers, and competitors. Everyone is expected to demonstrate loyalty to and act in the best interests of the company and to the exclusion of personal advantage in the satisfactory performance of their respective job or function. Any actual or potential conflict of interest must be immediately disclosed in writing to the Chief Executive Officer (the "CEO"), Chief Operating Officer (the "COO"), or the Chief Financial Officer (the "CFO") for resolution.

**Competitive Practices** – Perimeter and its employees will at all times conduct the company's business in a fair, ethical and legal manner. Everyone is expected to comply with all antitrust requirements, laws, and regulatory practices where it conducts business. In addition, everyone must be mindful and diligent in their dissemination of or collection of competitive information.

**Confidentiality** – Each employee, officer, and director will protect and maintain all proprietary, non-public, and confidential information of the company. Examples include, but are not limited to, product and business strategies, pending and existing contracts, pricing and market strategies, customer information, financial projections, and clinical research results. At all times, everyone must be mindful and diligent relative to dissemination or receipt of non-public and confidential information.

**Insider Information** – Non-public information obtained as a consequence of an employee's, officer's, or director's employment or position with the company may not be used for personal profit or gain. It is a violation of company policy, and possibly a violation of one or more laws, for an employee, officer, or director of the company to buy or sell shares of the company if they are aware of non-public "material" information about the company or to transmit "material" information to another person to trade or advise others to trade on the company's stock based on such information.

**Protection and Use of Assets** – All employees, officers, and directors are expected to ensure company property is used and handled in an efficient manner and with the strictest integrity in order to prevent damage, misuse or loss. Employees are responsible and accountable for the safekeeping of company property under their care and control. The company's property is not to be used for personal gain or benefit. This is applicable as well to commonly used property, records, facilities, equipment and other technology, furnishings, tools, and inventory in the company's offices.

**Fair Dealing** – All employees, officers, and directors are committed to nurture and maintain productive and long-term business relationships with the company's contractors, vendors, customers, regulatory authorities and with each other. At no time will any individual take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, position of authority, misrepresentation of material facts or any unfair or unlawful dealing or practice.

**Record Keeping** – All employees, officers, and directors are responsible to properly and accurately maintain all company information including, but not limited to, information regarding its employees, product development, business activities, customers, financial, and regulatory affairs. All company financial reports, expense reports, time sheets, sales reports, research reports, and clinical reports must accurately represent the relevant facts. No individual will sign, submit, or authorize others to sign or submit documents, statements, expense reports that are known to be false or misleading.

**Corporate Opportunities** – All employees, officers and directors owe a duty to the company to advance its legitimate business interests when the opportunity to do so arises. Employees, officers, and directors are prohibited from taking advantage of any opportunities that arise from or are discovered using company property, company information, company relationships, or position of authority for personal gain. All employees, officers, and directors are also prohibited from competing with the company directly or indirectly and owe a duty to the company to advance the legitimate interest of the company when the opportunity to do so arises.

**Payments** – Perimeter, its employees, officers, and directors will not make or receive any improper or unauthorized payments to or from government or non-government officials, employees, contractors, consultants, vendors, customers, or persons in the performance of the company's business. At no times are company funds, property, services, or contributions allowed to any politician, political party, or candidate for political office.

**Customer, Supplier, and Governmental Relationships** – The company does not seek to gain any advantage through the improper use of favors or other inducements. Good judgement and moderation must be exercised to avoid misinterpretation and any adverse impact on the reputation of the company or its employees. Offering, giving, soliciting, or receiving any form of a bribe is prohibited. Under no circumstances can gifts be given to any employee of a governmental or regulatory agency. Gifts, favors or other inducements cannot be accepted by an employee or any

member of their household from any individual, official, agency, customer or vendor seeking to do business with Perimeter.

**Business Relationships** – Perimeter is committed to working with contractors, vendors, and business partners who embrace and are committed to the standards of ethical behavior, business practices and a Code of Conduct that is consistent with our own.

**Reporting Violations of the Code** – All employees, officers, and directors are encouraged to talk to appropriate personnel within the company when in doubt about the best course of action in a particular situation. If you suspect a violation of any law, this Code, or any of the company's other policies, it should be reported immediately to the CEO, COO, or CFO. The company prohibits retaliatory action against any officer or employee who, in good faith, reports a possible violation. Retaliatory action includes termination of employment, demotion, discipline, or suspension, imposing any penalty or any form of intimidation or coercion and any threat to do any of the foregoing. It is unacceptable to file a report knowing it to be false, however, the company is committed to appropriately investigate all reports of violations or suspected violations made in good faith.

### **Reporting and Compliance**

1. The CEO, the COO, and the CFO, as officers of Perimeter Medical Imaging AI, Inc. are responsible for ensuring that all employees understand and comply with this Code of Conduct. Collectively the officers of the company are responsible for creating, training, and maintaining a work environment in which compliance to the Code of Conduct is expected and understood.
2. Employees, officers, and directors of Perimeter will be required to periodically confirm in writing that they understand and are complying with the Code of Conduct, that they are not aware of any violations of these policies or that they have properly reported any and all violations.
3. The company will promptly investigate any alleged violation of these policies. Violation of any policy, retaliation against any individual reporting a violation, or failure to otherwise comply with these policies will not be tolerated and could result in disciplinary action, including termination of employment when appropriate.