

## CODE OF ETHICS AND BUSINESS CONDUCT

V2 – September 2024

### Message from Global Leadership Team

At Echosens, it is important to us not only to succeed but to do so correctly, abiding by the law and upholding the values that we embody. Together, we are committed to liver health through creating solutions and value for our customers, patients and physicians, and shareholders, and through offering opportunities to our employees. Our shared commitment to the highest ethical standards and to making a positive difference in everything we do is what makes Echosens such a unique company.

Our commitment is to go beyond mere compliance. We innovate with integrity, using our understanding of technology and its impact on women and men to develop inclusive, responsible and sustainable solutions to complex business and societal challenges. For this reason, we want to provide our employees with the means to make the right decisions, act responsibly and express themselves with the fullest confidence.

With our Code of Ethics and Business Conduct, we want to help our employees make ethical behavior a part of their day-to-day activities; whether that be within the company, in dealings with our customers, our business partners or within our communities.

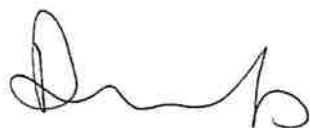
Our Code is more than just a document; it reflects the way we behave, work and lead. It is our means for improving our business performance and building on Echosens' reputation in the market. The activities and products of the Echosens Group have an impact on people's health. It is for this reason in particular that Echosens places ethics at the heart of its business.

Because Echosens ensures compliance with applicable treaties, laws and regulations, particularly as regards the protection of human rights and fundamental freedoms, the health and safety of people, the environment and ethics.

And because it is essential that these principles be supported by appropriate organization, this Code of Ethics and Business Conduct represents **the commitment** of Echosens managers to compliance with its terms, and to ensuring that it is implemented and followed. It applies to all Echosens employees, including interns and temporary staff, as well as to all providers and in particular service providers, agents, representatives and subcontractors.

Echosens' reputation is based on everyone adhering to shared rules, practices and principles that guide our daily conduct around the world.

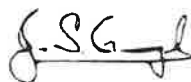
echosens



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Chief Science & Innovation Officer



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**Jo Massoels**  
Chief Marketing Officer



**Frédéric Tarbouriech**  
Chief Financial Officer



**Carole Garcia**  
Chief People Officer



**Fanny Patoureaux**  
VP Quality Assurance & Regulatory Affairs



**Victor de Lédinghen**  
Chief Medical Officer



**Romain Baujard**  
VP Pharma



**Serge Jeanjean**  
VP R&D and Operations

## GOVERNANCE

In addition to the GLT's commitment, and in order to ensure that its ethical principles are disseminated as widely as possible at Group level, Echosens has set up an **appropriate governance** structure based on:

- An **ESG Committee**, which monitors compliance with environmental, social and human rights commitments, and meets regularly to define the Group's action plan and the key stages of the program annually submitted to the Board of Directors;
- A **Risk Management Committee** whose aim is to provide a structured approach to the identification, assessment, management and mitigation of risks across the organization. This committee, which was set up back in 2016 and comprises members of Executive Management, is in charge of implementing control procedures to identify any potential breaches of international sanctions and put in place any applicable sanctions. It meets at least once a year, and as often as necessary on ad hoc subjects; its actions and decisions may potentially be submitted to members of the Board of Directors.

## OUR VALUES

The Group's commitment is further strengthened by its **CHOICES** values : Courage, Humility, Openness, Innovation, Commitment, Environment, Simplicity, in which Environment plays a key role.

## APPLICATION and DIFFUSION OF THE CODE OF ETHICS

This Code of Ethics applies to all Group employees and service providers, and is distributed to all new employees on joining. It is available on the Group's website, and is supplemented by the various codes and policies in force at local level and within the Group's scope of activity.

Each **manager** is responsible for embodying the commitments of the Code of Ethics and promoting them among his or her teams.

Each individual **employee** undertakes to respect these commitments in all circumstances within the scope of his or her activities.

The Code of Ethics is updated regularly.

The latest version in force is that applicable on September 1<sup>st</sup>, 2024.

### 1. PRINCIPLES AND AIMS

Echosens complies with and upholds all of the principles in the Global Compact launched by the United Nations in 2000, in particular those relating to fundamental principles and rights at work:

- Elimination of discrimination in respect of employment and occupation
- Elimination of all forms of forced and compulsory labor
- Prohibition of child labor
- Upholding the freedom of association and the effective recognition of the right to collective bargaining

Accountability, fairness, setting an example, respect for people's rights, environmental protection, patient and consumer interests, transparency, integrity and loyalty are the fundamental principles that guide our ethical values.

Accountability: in addition to strict compliance with the laws, regulations and ethical principles that govern our activities around the world, as a healthcare company we are committed to conducting our business responsibly.

Setting an example: more than a principle, it is a duty that ensures the credibility of our actions both inside our company and with our customers and partners.

Treating people fairly and with respect: we strive to create a work environment based on mutual respect and trust, both in relationships between the company and its employees and between employees themselves. These principles also apply to our relationships with partners.

Primacy of patient needs and interests: as a stakeholder in the healthcare industry, our primary focus is on improving patient outcomes and developing innovative solutions to meet their needs around the world, in compliance with applicable regulations.

Respect for the environment: committed to an active approach to environmental protection, we seek to integrate environmentally-friendly practices into our business activities through a sustainable and inclusive development policy.

Transparency: whether in the field of research or in our daily relationships with healthcare professionals, patients, public authorities and shareholders, we have a responsibility to act transparently.

Integrity and loyalty: we are committed not to engage in conduct that may corrupt relationships between individuals and entities, or that violates free competition.

It would be impossible for this Code of Ethics to detail every potential situation in which an employee may be exposed to a risk. Each employee must therefore use his or her own common sense when applying these principles, by referring to the existing rules and guidelines and, if necessary, seeking the opinion of his or her line manager.

## 2. COMMITMENT

As Group employees, each employee must understand the standards and policies, comply with them, ask questions and raise any compliance concerns that they may have.

Equally, each employee must report any wrongdoing that takes place in Echosens. If you witness or suspect that a law has not been complied with or that policies have been breached, you must report it promptly to your manager and to the Human Resources and Legal departments.

If circumstances require your anonymity to be protected, you may use the internal *Whistleblowing* procedure to make your report. The conditions for accessing this procedure and making contact are set out below.

All employees must undertake to behave as ethically as possible, specifically by acknowledging that they have read and agreed to comply with the principles of this Code of Ethics and Business Conduct.

### Our Employees

Echosens promotes diversity in employee profiles and career paths. Echosens undertakes to ensure that each of its employees is able to enjoy their rights regardless of skin color, sex, religion, political beliefs, national or social origin, age, disability, trade union membership, sexual orientation or gender identity.

Echosens prohibits any discrimination whatsoever whether in terms of recruitment, remuneration, working hours and rest periods or paid leave, maternity protection, job security, job assignment, evaluation, training, employment prospects or workplace health and safety.

Echosens opposes all forms of violence and harassment, whether physical, sexual, verbal or moral.

Echosens protects the health and safety of its employees, ensures that all its business activities comply with the health laws and regulations in force in all the countries in which the Group operates, and endeavors to implement best practices as regards safety in the workplace.

Echosens requires each employee to behave loyally: every one of them must preserve the reputation of the Group, its staff and its partners.

In particular, Echosens expects its employees, in accordance with the IT Charter, to exercise the utmost vigilance with regard to (i) the use of the IT tools made available to them and (ii) their communication and positions expressed on social networks, ensuring in particular that their interventions are purely personal and commit only themselves, and guaranteeing professional secrecy and respect for others.

We respect the **confidentiality of employee files and employee privacy**.

We ensure that only persons with the appropriate authorization and valid professional reasons have access to these areas, that such use is lawful, and that it is limited to legitimate legal or business purposes. Our employees have access to their own files.

### **Our shareholders**

The rights of the Group's shareholders, whether French or foreign, are protected by law and the corporate governance principles governing the Group's operation.

Echosens faithfully reflects its operations in its accounts, and publishes its performance information independently and transparently.

## **3. INTERNATIONAL BUSINESS STANDARDS AND PRACTICES**

**We conduct our business with honesty and integrity and are committed to complying with all laws and regulations.**

**We comply with all laws and regulatory requirements on medical devices.**

Our products are regulated by government agencies and regulatory authorities worldwide. Regulatory requirements include marketing approvals, product registrations, good manufacturing practices and design and labeling controls, among others.

**We monitor red flags and do what we can to prevent and avoid fraud.**

Fraud prevention is essential to maintain our reputation; fraud generally involves a form of deception aimed at obtaining financial benefit in particular.

**We emphasize the importance of integrity in all of our activities and those of our partners. Fraud is prohibited.**

**We strictly follow our policies and procedures for procurement, calls for tender and bidding.**

**We market our products honestly and in compliance with all laws and regulations.**

We must maintain our reputation as a **leading company** whose products and services are recognized for their quality, innovation, characteristics, performance and reliable results.

We implement the highest ethical standards in our interaction with **healthcare professionals**.

We do not offer or give anything of value to a healthcare professional for the purpose of inducing or influencing this individual to prescribe, use, purchase, lease or recommend our product or service.

Third parties acting on our behalf and representing Echosens are also subject to these restrictions and prohibitions.

**Trade compliance:** We comply with customs, anti-boycott, embargo and trade control laws.

We are committed to winning contracts solely on the basis of the quality and value of our products and services. Regardless of local customs or competitive practices, we do not offer, undertake to offer, authorize, ask to receive, condone receiving or actually receive payment of money or anything of value.

Here too, third parties acting on our behalf (such as distributors and/or consultants) are subject to the same restrictions.

**Combating money laundering:** We are committed to complying with all applicable laws and regulations designed to combat money laundering.

We only deal with reputable customers and third parties involved in legitimate business activities with funds from legitimate sources.

## 4. PRODUCT QUALITY

Echosens' reputation unquestionably rests on the quality of its products and services. We are committed to maintaining a reliable and effective quality system that meets global requirements.

Our production site in Créteil, France, complies with quality system regulations and is certified to ISO 13485, an international standard that provides the regulatory framework for quality management systems for medical device manufacturers.

The **Quality System** covers all aspects of our business to ensure product quality and safety, including but not limited to:

- Product design and development
- Design and inspection of manufacturing procedures
- Supplier quality management
- Procedures for checking non-compliant products

## 5. CONFIDENTIALITY

**Confidentiality of patients and third parties:** We respect the privacy of patients and third parties and respect the protection of their personal data.

**COMPREHENSIVE RESPECT FOR CONFIDENTIAL INFORMATION regarding:**

- Group strategy
- Proprietary information, particularly (i) computer programs, know-how, patents, trade secrets, technical drawings, copyrights, ideas, inventions, product specifications, prototypes, technical designs, research data and/or clinical results, (ii) marketing data, (iii) financial data such as prices, margins, budgets, (iv) human resources data, and more generally all information that uniquely characterizes our company.
- Personal information concerning employees and customers

We must be very strict about protecting this information. At the very least, a confidentiality agreement must be signed when such information must necessarily be exchanged. The legal department is at your disposal to provide you with any contractual support in this regard.

## 6. RESPECTING ECHOSENS' KNOW-HOW AND ITS INTELLECTUAL PROPERTY RIGHTS

Intellectual property rights are an undeniable strength of our company, particularly in terms of patents and trademark rights.

Echosens makes every effort to protect its assets and resources, based on a strategy to develop the protection of its technologies and to combat counterfeiting.

## **7. PROMOTING INTEGRITY IN THE CONDUCT OF ACTIVITIES**

Echosens requires its employees and partners to behave with exemplary integrity.

Non-compliance with regulations may expose the Group and its individual employees to criminal sanctions.

Without prejudice to any legal proceedings, employees who violate these internal rules and guidelines may be subject to disciplinary sanctions.

Echosens undertakes, and requires its employees and partners to undertake, to:

- Fight corruption and/or influence peddling in all their forms
- Prevent and manage conflicts of interest
- Take a reasonable approach to gifts and invitations
- Respect competition.

The Global Leadership Team and the ESG Committee remain at your disposal for any question you may have about these matters and policies.

Best Regards,

Dominique Legros, CEO

Sophie Ribes, ESG & Legal Director



## Whistleblowing System

### Direct line for confidential reporting - Safecall

As you know, Echosens' policy is to conduct our business with the highest ethical standards and in compliance with all the appropriate laws and this Code of Ethics.

Failure to comply with this policy can have serious consequences for our company and its reputation.

To help us achieve this goal, we encourage you to share your concerns about potentially unethical conduct or illegal activity with us by reporting the matter to our partner **Safecall**: together, we have established a professional, independent, external and confidential means guaranteeing your rights when reporting your concerns.

It is your responsibility to help Echosens fight fraud or inappropriate practices and report any suspected professional misconduct by calling Safecall on the number for your country of origin:

Safecall is an independent external reporting line where you can raise your concerns and be assured that they will be fully addressed. All calls are treated with the utmost confidentiality by independent staff who, should you wish for any reason whatsoever, will not disclose your name to Echosens.

Please note that Safecall is an additional service and does not replace other company policies and procedures already in place.

**Under no circumstances may you be subject to reprisals, sanctions, or pressure of any kind whatsoever as a result of an Alert made in good faith, even if the facts later prove to be inaccurate or do not give rise to any action.**

**The perpetrators of reprisals are liable to disciplinary sanctions.**

**Conversely, an Alert made in bad faith, with the intention of harming or damaging the image of the Reported Person, exposes its author to sanctions or even prosecution, according to the regulations of the country concerned.**

All calls are handled in complete confidentiality by Safecall's qualified personnel who will summarize the content of your call and send a report to the dedicated ethics unit for processing in conformity with the terms of the French Sapin 2 Law (N° 2016-1691 Dec. 9, 2016).

Safecall will not disclose your name to Echosens if you wish to remain anonymous.



## WHISTLEBLOWER PROCEDURE

For the **Formulation of an Alert**, regardless of the mode used, you must :

- Indicate whether you are an Echosens employee or an external or occasional collaborator
- Specify that you intend to formulate an Alert
- Describe facts directly related to the Alert, in a **precise, objective, relevant and factual** manner
- Submit any documents in support of the Alert if they seem relevant to you.

An **Alert** relates to :

- Facts of corruption or influence peddling
- Facts, proven or suspected, that may constitute :
  - o A crime or a misdemeanor
  - o A serious and manifest violation of a regularly ratified international commitment
  - o A threat or serious prejudice to the general interest
  - o Anti-competitive practices
  - o The existence or realization of risks to serious violations of human rights and fundamental freedoms, the health and safety of persons and the environment.

The **Alert System** includes :

Communicating with Safecall by calling the number corresponding to your country of origin, asking to communicate in the language of your choice.

You can also contact Safecall via the website: [www.safecall.co.uk/report](http://www.safecall.co.uk/report).

Or directly by phone depending on your country and available at: [Telephone Numbers - Safecall Ltd](#)

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