



## **Code of Ethics**

The Board of Directors of MediCapital Rent (the "Company") has adopted this Code of Ethics (this "Code") for its directors, officers and other employees (individually, "MediCapital Rent Party" and collectively, "MediCapital Rent Parties"). As used herein, the principal executive officer, principal financial officer, principal accounting officer or controller, or persons performing similar functions are sometimes also referred to as the "Senior Financial Officers". This Code has been reasonably designed to deter wrongdoing and to promote:

- Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- Full, fair, accurate, timely, and understandable disclosure in public communications made by the Company;
- Compliance with applicable governmental laws, rules and regulations;
- The prompt internal reporting to an appropriate person or persons identified in this Code of violations of this Code; and
- Accountability for adherence to this Code.

### **1. Honest and Ethical Conduct**

MediCapital Rent Parties are expected to act and perform their duties ethically and honestly and with the utmost integrity. Honest conduct is considered to be conduct that is free from fraud or deception. Ethical conduct is considered to be conduct conforming to accepted professional standards of conduct. Ethical conduct includes the ethical handling of actual or apparent conflicts of interest between personal and professional relationships as discussed in below.

### **2. Conflicts of Interest**

A conflict of interest exists where the interests or benefits of one person or entity conflict or appear to conflict with the interests or benefits of the Company. While it is not possible to describe every situation in which a conflict of interest may arise, MediCapital Rent Parties must never use or attempt to use their position with the Company to obtain improper personal benefits. Any MediCapital Rent Party who is aware of a conflict of interest, or is concerned that a conflict might develop, is required to discuss the matter with a higher level of management or the Board of Directors promptly.

### **3. Disclosure**

Senior Financial Officers are responsible for ensuring that the disclosure in the Company's periodic reports is full, fair, accurate, timely and understandable. In doing so, Senior Financial Officers shall take such action as is reasonably appropriate to (i) establish and comply with disclosure controls and procedures and accounting and financial controls that are designed to ensure that material information relating to the Company is made known to them; and (ii) ensure that information contained in the Company's periodic reports fairly presents in all material respects the financial condition and results of operations of the Company.

Senior Financial Officers will not knowingly (i) make, or permit or direct another to make, materially false or misleading entries in the Company's, or any of its subsidiary's, financial statements or records; (ii) fail to correct materially false and misleading financial statements or records; (iii) sign, or permit another to



sign, a document containing materially false and misleading information; or (iv) falsely respond, or fail to respond, to specific inquiries of the Company's independent auditor or outside legal counsel.

#### **4. Compliance**

It is the Company's policy to comply with all applicable laws, rules and regulations. It is the personal responsibility of each MediCapital Rent Party to adhere to the standards and restrictions imposed by those laws, rules and regulations, and in particular, those relating to accounting and auditing matters. Any MediCapital Rent Party who is unsure whether a situation violates any applicable law, rule, regulation or Company policy should discuss the situation with the Board of Directors.

#### **5. Internal Reporting**

MediCapital Rent Parties shall take all appropriate action to stop any known misconduct by fellow MediCapital Rent Parties that violate this Code. To this end, MediCapital Rent Parties shall report any known or suspected misconduct to the Board of Directors. The Company will not retaliate or allow retaliation for reports made in good faith.

#### **6. Accountability**

Any violation of this Code may result in disciplinary action, including termination, and if warranted, legal proceedings. This Code is a statement of certain fundamental principles, policies and procedures that govern the MediCapital Rent Parties in the conduct of the Company's business. It is not intended to and does not create any rights in any employee, customer, supplier, competitor, shareholder or any other person or entity. The Board of Directors and/or the Audit Committee will investigate violations and appropriate action will be taken in the event of any violation of this Code.

#### **7. Amendments of the Code**

The Company is committed to continuously reviewing and updating our policies and procedures. Therefore, this Code is subject to modification. Any amendment or waiver of any provision of this Code must be approved in writing by the Company's Board of Directors and promptly disclosed pursuant to applicable laws and regulations.