

Ethics Policy Gannet B.V. (August 2025)

1. Introduction

This Ethics Policy outlines the principles and standards guiding Gannet B.V., a medical company dedicated to developing, producing, and distributing high-quality hip implants. Our mission is to improve patient health and mobility while upholding the highest ethical standards, in full compliance with Dutch law and relevant European Union regulations.

2. Core Values

We are committed to the following values:

- Integrity: Acting honestly and transparently in all interactions.
- Quality: Ensuring our products meet the highest safety and medical standards.
- Respect: Treating patients, healthcare professionals, employees, and partners with dignity.
- Responsibility: Taking accountability for our impact on society and the healthcare system.
- Innovation: Continuously improving our products and practices to serve patient needs.

3. Compliance with Dutch and EU Law

We strictly adhere to Dutch healthcare and medical device regulations, including the Medical Device Regulation (MDR) and the Wet op de Medische Hulpmiddelen. We ensure that all hip implants are CE-marked, clinically evaluated, and produced under Good Manufacturing Practices (GMP). Our operations also comply with competition law, data protection (AVG/GDPR), and anti-bribery legislation.

4. Patient Safety and Product Quality

Patient well-being is our highest priority. We commit to:

- Rigorous clinical testing and continuous post-market surveillance.
- Transparent reporting of product performance and potential risks.
- Providing accurate, accessible information to healthcare professionals and patients.
- Implementing robust quality assurance systems.

5. Relationships with Healthcare Professionals

Our interactions with healthcare professionals are guided by fairness, transparency, and independence. We do not offer improper financial or material incentives. Collaborations are based solely on advancing patient care, research, and medical education, in line with the Dutch Code of Conduct for Medical Devices (Gedragscode Medische Hulpmiddelen).

6. Data Protection and Confidentiality

We respect patient privacy and comply with the General Data Protection Regulation (GDPR/AVG). Personal and medical data is collected, stored, and processed securely, with the highest level of confidentiality.

7. Environmental and Social Responsibility

We aim to minimize our environmental footprint through sustainable practices in manufacturing, packaging, and distribution. We also foster diversity, equal opportunity, and safe working conditions for all employees.

8. Reporting Concerns

Employees and stakeholders are encouraged to report any concerns regarding potential ethical or legal violations. We provide secure, confidential reporting channels and ensure protection against retaliation in line with Dutch whistleblower legislation.

9. Implementation and Review

This policy is communicated to all employees, partners, and stakeholders. Regular training is provided to ensure awareness and compliance. The policy is reviewed annually and updated when necessary to remain aligned with Dutch and EU legal requirements.