

OSTEONIKA LLC

(ТОВ «Остеоніка»)

GENDER EQUALITY PLAN

(GEP)

for the period 2026–2028

Developed in compliance with the Horizon Europe eligibility criterion

(Regulation (EU) 2021/695 and the General Annexes to the Horizon Europe Work Programme 2026–2027)

PIC: 864839682

Approved by the Director of Osteonika LLC

Date of approval: « 19 » February 2026



1. Introduction and Statement of Commitment by Top Management

Osteonika LLC (hereinafter — Osteonika, the Company) is a Ukrainian company operating in the field of medical devices and innovative solutions for orthopaedic trauma surgery. The Company focuses on the research, development, and market introduction of products that improve patients' quality of life regardless of sex, age, or other socio-demographic characteristics.

Osteonika recognises that gender equality is a fundamental value of the European Union, a key prerequisite for high-quality research and innovation (R&I), and an essential element of sustainable business development. The Company affirms its commitment to ensuring equal opportunities for all employees, candidates, partners, and research participants regardless of sex, gender identity, age, ethnic origin, religion, disability, family status, or sexual orientation.

This Gender Equality Plan (hereinafter — GEP) is an official strategic document of Osteonika that defines the vision, objectives, concrete measures, responsible persons, and monitoring indicators in the field of gender equality, inclusiveness, and diversity for the period 2026–2028. The document has been developed in line with the four mandatory process-related requirements and the five recommended thematic areas defined by the European Commission for a GEP as an eligibility criterion under the Horizon Europe programme.

Statement of Top Management

The management of Osteonika LLC fully commits to the implementation of this Gender Equality Plan, the allocation of necessary human and financial resources, regular monitoring of progress, and open communication of the achieved results to staff, partners, and the public. Any forms of discrimination, harassment, gender-based violence, or sexual harassment within the Company are unacceptable and entail liability under the applicable legislation of Ukraine and the internal policies of Osteonika.



Director of Osteonika LLC

Date: « 19 » february 2026

2. Legal Basis and Scope of Application

2.1. International and European Legal Framework

- Regulation (EU) 2021/695 of the European Parliament and of the Council of 28 April 2021 establishing Horizon Europe;
- EU Gender Equality Strategy 2020–2025 and EU Gender Equality Strategy 2026–2030;
- General Annexes to the Horizon Europe Work Programme 2026–2027 (GEP eligibility criterion);
- European Commission's Horizon Europe Guidance on Gender Equality Plans (2021, with 2026 updates);
- UN Universal Declaration of Human Rights and the UN Convention on the Elimination of All Forms of Discrimination against Women (CEDAW);
- UN Sustainable Development Goals, in particular Goal 5 'Gender Equality' and Goal 10 'Reduced Inequalities'.

2.2. National Legal Framework of Ukraine

- Constitution of Ukraine (Article 24 — equality of constitutional rights and freedoms regardless of sex);
- Law of Ukraine 'On Ensuring Equal Rights and Opportunities of Women and Men';
- Law of Ukraine 'On the Principles of Preventing and Combating Discrimination in Ukraine';
- Law of Ukraine 'On Preventing and Combating Domestic Violence';
- Labour Code of Ukraine (provisions on equal pay, prohibition of discrimination, protection of maternity and paternity);
- EU–Ukraine Association Agreement (commitments to harmonisation with European gender equality standards).

2.3. Scope of Application

This GEP applies to all Osteonika employees regardless of the type of employment relationship (full-time / part-time, permanent / fixed-term contracts, freelance, internship), as well as to all job applicants, partners, suppliers, contractors, and participants in the Company's research activities. The provisions of the Plan are integrated into all internal policies, procedures, and operational processes.

3. Four Mandatory Process-Related Requirements (Building Blocks)

In accordance with the Horizon Europe eligibility criterion, a GEP must satisfy four mandatory process-related requirements. The implementation of each in Osteonika is described below.

3.1. Building Block 1: Public Document

This GEP is an official document signed by the Director of Osteonika LLC, made publicly available on the Company's official website, and actively communicated to all personnel.

Implementation measures:

- Publication of the full GEP text in Ukrainian and English in the 'About us' section of Osteonika's official website within 30 calendar days of approval;
- Distribution of the document to all employees by email with confirmation of receipt;
- Presentation of the key provisions of the GEP at a general staff meeting no later than 60 days after approval;
- Inclusion of a link to the GEP in the standard onboarding package for new employees;
- Reference to the GEP and gender equality principles in public communications, job advertisements, grant applications, and marketing materials;
- Annual public report on the GEP implementation results, published on the Company's website.

3.2. Building Block 2: Dedicated Resources and Expertise

Osteonika commits to allocating sufficient human, time, and financial resources for the development, implementation, monitoring, and updating of this GEP.

Institutional structure:

- A Gender Equality Officer (GEO) is appointed by the Director's order, with a defined share of working time (no less than 10%), authority, and direct reporting line to the Director;
- A Gender Equality Working Group (GEWG) is established with at least 3–5 members representing different departments (HR, R&D, production, commercial, administration) with a balanced gender composition;
- The GEWG meets at least once a quarter, keeps minutes, and prepares an annual GEP implementation report;
- External gender equality consultants and experts are engaged where necessary for audits, training, and consultations.

Financial resources:

- A dedicated line in Osteonika's annual budget covers GEP implementation: training and capacity building, external consultancy, research and audits, communication materials, and work-life balance support measures;
- The budget is reviewed and approved annually together with the Company's overall budget;
- When preparing grant applications (Horizon Europe, EIC, EIT Health, EU4Health and others), gender-related implementation costs and GEP-related activities are integrated into the project budget where allowed by the programme rules.

3.3. Building Block 3: Data Collection and Monitoring

Osteonika systematically collects, analyses, and publishes data on the gender dimensions of personnel and operational activities, in compliance with the General Data Protection Regulation (GDPR) and the Law of Ukraine 'On Personal Data Protection'.

Categories of data collected at least annually:

- Gender composition of personnel by levels (top management / middle management / specialists / technical and support staff);
- Gender composition of R&D teams and persons holding leading roles in research projects;
- Gender pay gap broken down by position and department;
- Recruitment data: ratio of applicants and hires by sex at each stage (application → interview → offer → hire);
- Data on staff turnover, career progression, and access to training disaggregated by sex;
- Use of parental leave by mothers and fathers;
- Anonymised data on complaints related to discrimination, harassment, or gender-based violence;
- Gender composition of participants in clinical / user studies conducted by the Company, where relevant.

Reporting and indicators:

The Gender Equality Officer, jointly with the HR function, prepares an annual monitoring report containing quantitative key performance indicators (KPIs) — see Section 6 — compared with previous periods and target values. The report is reviewed by the GEWG, approved by the Director, and published in an anonymised version in the public domain.

3.4. Building Block 4: Training and Awareness Raising

Osteonika ensures regular training and awareness-raising activities on gender equality, anti-discrimination, unconscious gender bias, and inclusive communication for all personnel, with a strengthened focus on decision-makers (Director, HR, department heads, recruiters).

Mandatory training activities:

- Introductory online module on gender equality and inclusiveness for all new employees (to be completed before the end of the probationary period);
- Annual mandatory training for all staff (minimum 2 academic hours) on equal opportunities, anti-discrimination, gender-based violence, and sexual harassment;
- Advanced training on unconscious gender bias for managers, recruiters, and persons involved in the assessment of candidates and employees (minimum 4 academic hours per year);
- Training on integrating the gender dimension into research and innovation content for R&D teams — particularly relevant for medical device development, where biological and socio-cultural differences between sexes are critical for product safety and efficacy;

- Awareness campaigns (internal newsletters, posters, webinars) timed to International Women's Day (8 March), International Day of Women and Girls in Science (11 February), and the International Day for the Elimination of Violence against Women (25 November).

4. Five Recommended Thematic Areas

The European Commission recommends that a GEP cover five content-related thematic areas with concrete measures and targets. Osteonika's approach to each is described below.

4.1. Thematic Area 1: Work-Life Balance and Organisational Culture

Objectives:

- Create a working environment that supports employees of all sexes in combining professional and family responsibilities;
- Foster an organisational culture based on respect, equality, and inclusiveness.

Concrete measures:

- Introduction of a flexible working hours policy and hybrid working arrangements (where possible given the nature of the role);
- Support for parental leave for both parents, with active information for male employees about their right to childcare leave;
- Protection from discrimination on grounds of pregnancy, maternity, or paternity; guaranteed return to an equivalent position after parental leave;
- Provision of breastfeeding rooms in case of staff growth and demand;
- Avoidance of mandatory work events, meetings, and business trips at times that prevent family responsibilities (e.g. after 18:00, on weekends, during traditional school holidays) without objective necessity;
- Regular anonymous engagement surveys with sex-disaggregated breakdown — at least once a year;
- Adoption and publication of a Code of Ethical Conduct unequivocally prohibiting discrimination, harassment, mobbing, and sexual harassment, with a transparent confidential complaints channel.

4.2. Thematic Area 2: Gender Balance in Leadership and Decision-Making

Objectives:

- Achieve gender balance in Osteonika's leadership positions and in the composition of working, advisory, and expert groups;
- Eliminate the 'glass ceiling' and structural barriers to women's career progression in the Company and in the medical technology sector overall.

Concrete measures:

- Target: at least 40% representation of each sex among the leadership team and R&D leaders by the end of 2028;
- Principle of balanced composition of internal committees, advisory groups, juries, and assessment panels (minimum 40% of each sex, where possible);
- Mentorship programme for women aspiring to career growth in technical, research, and managerial roles;
- Systematic review of succession planning with the application of the gender balance criterion;
- Active promotion of Osteonika women leaders as speakers at industry conferences, in the media, and in grant applications.

4.3. Thematic Area 3: Equity in Recruitment and Career Progression

Objectives:

- Ensure a fair, transparent, non-discriminatory recruitment and promotion process based on competencies;
- Guarantee equal pay for equal work and eliminate the unjustified gender pay gap.

Concrete measures:

- Review of all job advertisements for gender-neutral language and inclusive formulation of requirements (avoidance of stereotypically masculine or feminine wording, no unjustified restrictions on age or sex);
- Active outreach to candidates of the under-represented sex — particularly in technical, engineering, and research roles where men predominate, and in HR / administrative roles where women predominate;
- Structured interviews with standardised assessment criteria and, where possible, gender-balanced panels (minimum 40% of each sex);
- Annual internal pay audit to identify and eliminate unjustified gender gaps; publication of aggregated results in the monitoring report;
- Transparent and documented criteria for promotions, salary reviews, and bonus payments;
- Equal access to training, conferences, internships, and professional development programmes — participation monitored by sex.

4.4. Thematic Area 4: Integration of the Gender Dimension into Research and Innovation Content

This is the most specific area for Osteonika's activities, since the Company develops medical devices for the musculoskeletal system. Biological (anatomical, hormonal, physiological) and socio-cultural differences between sexes and age groups have a critical impact on disease epidemiology (e.g. osteoporosis is significantly more prevalent in postmenopausal women), biomechanics, treatment course, and intervention outcomes.

Objectives:

- Systematically take into account sex and gender, as well as age, ethnic origin, and other relevant characteristics in research design, product development, and effectiveness assessment;
- Prevent errors related to under-representation of certain groups in the design and validation of medical devices.

Concrete measures:

- Inclusion of a mandatory section on sex/gender analysis in the internal protocol of every R&D and clinical study;
- Ensuring sex- and age-balanced representation of participants in user and clinical studies, where methodologically justified; documenting any deviations from balance in the protocol;
- Analysis of test results and clinical data with mandatory stratification by sex and age;
- Documentation of gender dimension considerations in product technical files in line with the EU Medical Devices Regulation (MDR 2017/745);
- Training of R&D personnel, engineers, and regulatory specialists on methodologies for integrating the gender dimension into R&I (drawing on the European Commission's Gendered Innovations 2 resources);
- Partnerships with research institutions and hospitals to ensure sample diversity in joint studies.

4.5. Thematic Area 5: Measures against Gender-Based Violence, Including Sexual Harassment

Objectives:

- Maintain a working environment free from any forms of gender-based violence, harassment, mobbing, and sexual harassment;
- Provide every employee with a transparent, safe, and confidential mechanism for reporting violations.

Concrete measures:

- Adoption of a separate Anti-Harassment, Anti-Discrimination and Sexual Harassment Policy as an integral annex to the GEP;
- Establishment of a confidential reporting channel (whistleblower channel) — an electronic form and / or a trusted person independent of the line management, with guaranteed protection of the reporting person;
- Clear complaint handling procedure with defined timelines, principles of fair investigation, anti-retaliation safeguards, and documented outcomes;
- Mandatory training for all staff on recognising and preventing gender-based violence and sexual harassment (at least once every two years);
- Psychological and legal support for affected persons, including contacts of specialised national services (Ukrainian National Hotline for Prevention of Domestic Violence — 116 123);
- Annual anonymous staff survey on the experience and perception of workplace safety.

5. Governance, Responsibility, and Communication

5.1. Distribution of Responsibilities

Role	Areas of responsibility
Director of Osteonika LLC	<ul style="list-style-type: none"> • Approval of the GEP and annual updates; • Allocation of budget and resources; • Strategic support and public advocacy of GEP principles; • Decision-making based on monitoring reports.
Gender Equality Officer (GEO)	<ul style="list-style-type: none"> • Coordination of GEP implementation; • Preparation of annual monitoring reports; • Organisation of training and awareness campaigns; • First point of contact for gender equality matters; • Reporting to the Director.
Gender Equality Working Group (GEWG)	<ul style="list-style-type: none"> • Collegial body for GEP implementation; • Development of proposals to improve policies; • Review of indicators and data analysis; • Meetings at least once a quarter.
HR function	<ul style="list-style-type: none"> • Collection of HR data disaggregated by sex; • Review of job advertisements and recruitment processes; • Administration of training; • Internal communications.
Department managers	<ul style="list-style-type: none"> • Integration of GEP principles into daily team work; • Ensuring equal access to opportunities; • Response to signs of discrimination / harassment; • Support of work-life balance within the team.
All employees	<ul style="list-style-type: none"> • Compliance with the GEP and the Code of Ethical Conduct; • Participation in training; • Reporting violations through official channels.

5.2. Internal and External Communication

- 'Gender Equality' section on the internal corporate portal / shared drive containing the full GEP text, policies, complaint forms, and contact details;
- 'Gender Equality' page on Osteonika's official website with the English version of the GEP — for open access by partners, EU expert evaluators, and the general public;
- Regular (at least twice a year) internal newsletters on the progress of GEP implementation;
- Inclusion of information on the GEP and its results in the Company's annual non-financial / ESG report (where applicable).

6. Indicators, Targets, and Monitoring

Progress in GEP implementation is assessed on the basis of the key indicators below. Baseline values are recorded in the first year of GEP implementation (2026); target values are set for the horizon of end-2028.

Indicator (KPI)	Type	Frequency	Target 2028
Share of each sex in the total headcount	Quantitative	Annually	40–60%
Share of each sex in leadership positions	Quantitative	Annually	≥ 40%
Share of each sex among R&D leaders	Quantitative	Annually	≥ 40%
Adjusted gender pay gap	Quantitative	Annually	≤ 5%
Share of staff completing annual gender equality training	Quantitative	Annually	≥ 95%
Share of R&D projects with documented gender dimension analysis	Quantitative	Annually	100%
Share of vacancies with gender-neutral wording	Quantitative	Annually	100%
Number of registered complaints; share processed within prescribed time limits	Quantitative / qualitative	Annually	100% on time
Staff satisfaction with the working environment (by sex)	Qualitative	Annually	≥ 80%
Share of male employees taking parental leave	Quantitative	Annually	Increasing

6.2. Review and Update of the GEP

- The GEP is subject to annual review at the Gender Equality Working Group meeting based on the monitoring report;
- A full update of the document is carried out every 3 years (next planned: 2029) or earlier in case of significant changes in the Company's structure, legislation, or EU requirements;
- The updated document is approved by the Director and published in the same manner as the original version.

7. Implementation Roadmap 2026–2028

Period	Key activities	Responsible
Q2–Q3 2026	Approval of the GEP, appointment of the GEO, formation of the GEWG; Publication on the website, distribution to staff, presentation to the team; First baseline data collection; Adoption of the Code of Ethical Conduct and the Anti-Harassment Policy.	Director, GEO, HR
Q4 2026	Launch of the confidential reporting channel; First introductory training for all staff; First pay audit.	GEO, HR, GEWG
2027	Advanced training for managers and recruiters; Launch of the mentorship programme; Integration of gender dimension analysis in all R&D protocols; First full monitoring report; public release.	GEO, R&D, HR
2028	Assessment of progress against all KPIs; Benchmarking against best European practices; Preparation of the updated GEP for 2029–2031; External expert evaluation (where feasible).	Director, GEO, GEWG, external experts

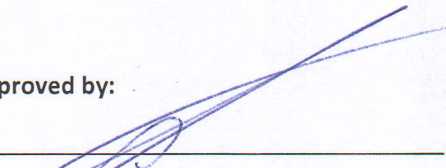
8. Final Provisions

This Gender Equality Plan enters into force on the date of its approval by the Director of Osteonika LLC and remains in effect until the next edition is adopted. The document is mandatory for all employees of the Company.

For enquiries regarding the content or implementation of the Plan, or to report potential violations, please contact the Gender Equality Officer at: gender-equality@osteonika.com (the address will be activated after GEP approval) or via the confidential form on the Company's official website.

In case of any discrepancy between the Ukrainian and English versions of this document, the Ukrainian version shall prevail.

Approved by:



Director of Osteonika LLC

Svitlana Burburska

Date: «19» February 2026

(Company seal)

