

Gender Equality Plan (GEP)

aap Implantate AG

March 2025

1. Introduction

aap Implantate AG (“aap”) is a globally active medical technology company based in Berlin, Germany. The company develops, produces and markets products for traumatology. The IP-protected portfolio includes the innovative anatomical plate system LOQTEQ® and a wide range of cannulated screws. In addition, aap Implantate AG has an innovative pipeline with promising development projects such as antibacterial silver coating technology and magnesium-based implants.

aap manufactures all its plates and screws in-house and operates a traditionally male-dominated production facility. Given the labor-intensive nature of production, this factor must be considered when assessing the overall workforce.

Rubino Di Girolamo has been elected by the annual general meeting as CEO since 2019. He has established a balanced personnel and leadership structure across all functional departments, which is also reflected in recruitment and succession planning. This commitment is embedded in the company’s Code of Conduct and Corporate Governance Declaration and in reference to the GRI standards.

Read more:

- Corporate Governance Declaration (only available in German), p.8:
[aap Implantate AG | Erklärung zur Unternehmensführung](#)
- Code of Conduct, p. 9 „Human Rights”
[Code of Conduct aap_EN_2401_final](#)

2. Objectives and Scope

aap knows that our employees are proud to work with the company and are committed to our purpose of making a meaningful impact to patient’s life and health. The company pays attention to gender equality and a balanced proportion of females in general staff and in leadership and management positions. The company strives for uniform pay for comparable functions and positions regardless of gender. The salary structure is based on standard market industry benchmarks and complies with German labor legislations for minimum wages and limits on weekly working hours.

The incentive scheme of the Management Board also includes non-financial KPIs counting for 10 percent of their variable bonus including target settings such as implementing and driving gender equality and training completion rates for all employees of 75%.

The Management Board is equally balanced, comprising of one male and one female with Rubino Di Girolamo (CEO) and Agnieszka Mierzejewska (COO), both bringing extensive experience in the medical devices and patient care industry.

Promoting gender equality means ensuring that women and men have equal opportunities to access leadership roles and career advancement. The Management Board recognizes the importance of gender equality and is committed to developing a comprehensive strategy to promote equal opportunities within the company. While no formal strategy is currently in place, the Board is actively exploring initiatives to continuously increase female representation in leadership roles. The focus will be on creating an inclusive work environment, removing potential barriers and implementing measures that support the promotion of women in traditionally male-dominated roles. These topics are ultimately responsible for a balanced workforce and management team.

Read more:

Compensation report 2023 on p.8

[aap Implantate AG | Vergütungsbericht](#)

3.Key Areas of action

a. Work life balance and organizational culture

To support a better work life balance *aap* is offering our employees the opportunity to work from home for up to three days per week. This flexible work arrangement allows employees to manage their professional responsibilities while also benefiting from a more balanced and productive work environment. In addition, the company introduced the support of E-bike leasing since this business year 2025. These initiatives reflect our commitment to employee well-being, health and performance, recognizing that a balanced work arrangement contributes to overall job satisfaction and success.

b. Gender Balance in leadership and decision making

The current KPI determines that by 30 June 2022, 33% of the Supervisory Board should be held by females, and there has been no target setting for the Management Board. New KPIs will be set in summer 2025 with the intention to keep the already existing equally balanced ratio in the future.

As of 31 December 2024, 50% of the Supervisory Board (2 male:2 females) is held by females and similar 50% (1 male:1 female) are held by females in the Management Board.

Succession planning at *aap* I aims to increase female representation in traditionally male- dominated roles, ensuring a more diverse and inclusive leadership pipeline. By fostering equitable opportunities, *aap* can cultivate a balanced workforce that benefits from diverse perspectives and skills. As part of this planning there are in the R&D and QM/Clinical department female deputies of the respective head of the department, being prepared for a potential succession of such leading positions.

c. Recruitment

aap is actively seeking to recruit female candidates for both existing and new positions. While skill set, qualifications, expertise and experience remain key factors in the selection process, recruitment firms engaged by *aap* are specifically instructed

to include female candidates, even for roles in R&D and traditionally male-dominated functions.

**d. Integration of gender dimensions in research and teaching
(Promote gender sensitive research)**

- The accounting for potential gender differences contributes to excellence, accuracy, reproducibility and creativity in research, enables a deeper understanding of needs, behaviors and approaches to problem solving, and increases the societal relevance of research and innovation.
- The gender dimension in the entire R&D cycle includes the setting of research priorities, the definition of concepts, the formulation of research questions, the development of methods, the collection and analysis of data, the evaluation and reporting of results and their transfer to markets, products and innovations. It is therefore highly important in many areas of R&I.
- Consequently, the management of the research and development department is equally balanced between female and male. Future *aap* training and development program plans to include mandatory courses on gender equality and diversity for the wider management team. With these courses, *aap* aims to raise awareness and promote an even more inclusive workplace.

e. Measures against gender-based violence and sexual harassment

As stated in the Code of Conduct, *aap* does not tolerate discrimination against people based on their gender, ethnicity, race, age, religion, nationality or sexual orientation.

Compliance with our Code of Conduct is supported by a whistleblowing system. This whistleblowing line is operated by an independent external third party, EQS Group, and allows employees to anonymously report concerns regarding potential violations of the Code of Conduct. The software-based solution helps to protect both people and our organizational values. It is available in German language, 24/7 and 365 days a year. Any concern will be investigated promptly and efficiently.

In 2024 no concerns on a potential Code of Conduct violation were raised.

Read more:

aap Implanate AG Code of Conduct on p. 9 (gender-based violence and harassment) and p. 12 (Whistleblowing system)

[EQS Safe Channel](#)

[aap Implanate AG | Whistleblowing System](#)

4. Implementation and Monitoring

The Supervisory Board is equally balanced, resulting in a 50:50 ratio. As the supreme management body of *aap* Implantate AG, it ensures diversity and strong corporate governance.

The management positions at the management level shows a balanced structure, with 50% of positions held by male and 50% by female, based on figures from 2024.

The management positions at the “head” or “director” level also show a balanced structure, with 60% of positions held by men and 40% by women, based on figures from 2024.

Leadership positions over the past five years:

	31/12/2024	31/12/2023	31/12/2022	31/12/2021	31/12/2020
Head/Director male	6	9	9	8	8
Head/Director female	4	4	4	4	2
Total	10	13	13	12	10

As of 31 December 2024, general staff (head count: 83) is composed by 31% female and 69% male, whereas on the male side the production facility is included which has an overweight of male employees.

The company also employs students at the R&D and related RA/Clinical department. As of 31 December 2024, the company employed 3 male students and 2 female students.

The Management Board, together with the Head of Human Resources, promotes gender equality and ensures that it is embedded in the corporate strategy and budget cycles of *aap* Implantate AG, while regularly reporting to the Supervisory Board on progress.

Read more:

Corporate Governance Declaration Report on p.8.

[aap Implantate AG | Corporate Governance Declaration](#)

Berlin, March 2025

Rubino Di Girolamo
CEO
aap Implantate AG

Agnieszka Mierzejewska
COO
aap Implantate AG