



delmont imaging



Ethics policy

The ethics policy describes the way in which Delmont imaging is committed to economic and social issues.

We, Delmont imaging, have drawn up this policy with the aim of identifying the conduct, values and principles that should guide our work and our decisions within our company, with our partners and in our community in order to fulfil our mission:

To improve the care and management of all patients, whatever their age and whatever their future, by providing the profession with innovative, effective and less traumatic solutions.

We are committed to respecting these principles in everything we do, so that our activities reflect positively on our employees and our company.

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Our ethical commitments

➤ Contributing to human progress

For our patients and users, we are not content to simply keep up with medical developments. We want to be an active driver of medical and technological progress in gynaecology and are constantly looking for new ideas and improvements. This is a key value in establishing partnerships with our customers based on the care of the woman who, ultimately, must benefit from our efforts.

➤ Building relationships based on trust

For our partners, we want to be the trusted and local contact who is always there when they need us. We are committed to working with a strong sense of honesty and integrity in all our dealings.

➤ Showing empathy

An open atmosphere that encourages the emergence of new ideas has been crucial to the dynamic development of our company. We see the world through the eyes of our users, enabling us to tailor our products and services precisely to their needs. It's this approach and open communication that enable us to achieve the kind of collaboration that makes outstanding achievements possible.

Safe working environment

Responsibility for ethical policy

We ask all our employees, including management, to comply personally with the contents of our ethical policy. It is distributed on adoption and annually thereafter to every employee, officer and director of the company, as well as to every new employee.

As such, it applies to all Delmont imaging employees, worldwide. We expect them to internalise these values and principles and apply them in their work. Each employee plays an important role in the ethical decision-making process and, consequently, plays an important role in the implementation of this company commitment.

Management has a special responsibility and must act as a role model. We expect the company's management to adhere fully to these values and principles and to share their importance with the people with whom they work. It always defends the interests of the company, including its economic success. It actively encourages collaboration and trustworthy interaction between the company's various departments. Assignments and responsibilities are delegated clearly and consistently.

Compliance with this commitment is a condition of employment at Delmont imaging. We are all expected to read and understand it and our policies and procedures, and to strive to meet the principles of integrity and ethics set forth in it. No waiver of this commitment will be tolerated. Any employee who breaches this commitment will be subject to disciplinary action. The fact that our competitors may behave differently is no excuse for failing to meet the high professional standards required of Delmont imaging employees. We do not compromise these responsibilities in order to achieve financial plans or maximize profits.

It is the responsibility of each manager to ensure that the laws and requirements of this commitment are known and complied with in their department. They are responsible for violations that could have been avoided or made more difficult by proper supervision. If violations become known, they must report them immediately.

Our company's internal organisation takes into account the objectives of this commitment. The application of the principle of dual control, the separation of incompatible functions and comprehensive documentation help to prevent irregularities and facilitate the recognition and correction of any inconsistencies.

Fairness and respect

We recognise that all employees and people in general must be treated with respect and dignity and must have access to the rights and freedoms set out in the United Nations Charter of Human Rights, and we act accordingly.

We do not authorise child or forced labour by our company, nor do we work with business partners who employ children or forced labour.

We respect workers' freedom of association as defined by local laws. Our employees are able to speak openly with management about their working conditions without being threatened with reprisals or intimidation.

We offer wages and benefits that do not fall below the minimum wages established by law or company practice, and working hours comply with the legal working hours of the country in which we operate. Under no circumstances do we force employees to work excessive overtime.

Employee privacy

We respect privacy. Personal and medical records, salary, benefits and terms and conditions of employment are considered confidential and access to this information is restricted. Personal information is only disclosed to third parties with the employee's approval, except to meet legitimate requirements from competent authorities.

Personal items, messages or information that you consider private should not be placed or kept anywhere in the Delmont imaging workplace, such as telephone systems, computer systems, offices. Delmont imaging management has the right to access your computer, e-mail, voice mail and work areas as well as any other Delmont imaging facility. Employees, however, must not access another employee's workspace, including electronic files, without prior approval from management.

Anti-discrimination and anti-harassment

We are committed, within the framework of the laws and statutes in force, to providing a workplace free from all forms of discrimination and harassment. We demand equal opportunities and equal treatment for our employees.

This includes, for example, any discrimination against employees on the grounds of gender, racial, ethnic or cultural origin, disability, social origin, political or religious convictions or belief, age or sexual orientation. This also includes the exclusion of any unacceptable behaviour towards employees, such as physical violence, sexual or personal harassment, related to gestures, physical contact and the use of appropriate language.

This treatment applies to all phases of the employment relationship: recruitment, training and promotion. Employees are expected to behave appropriately in the workplace and to apply normal standards of courtesy and consideration in their dealings with colleagues, as well as with any other person who may have dealings with the company.

Health, safety and security

We provide our employees and visitors with a safe and healthy working environment. We spare no effort to prevent accidents and continuously improve workplace safety. We identify occupational as well as external risks and implement risk-proportionate programmes to actively prevent or mitigate commonly known risks. Health and safety conditions for employees must comply with legislation.

You must report immediately to the appropriate management any incident or injury sustained in the workplace, or any environmental, health or safety concerns you may have. Appropriate and timely action will be taken to correct unsafe conditions.

Protection and use of company assets

You are responsible for protecting Delmont imaging's assets, including physical assets such as facilities, equipment and inventory, and intangible assets such as patents, copyrights and trade secrets. This requires that you protect all company-owned property assigned to you or any vendor or customer-owned equipment entrusted to Delmont imaging.

Use and maintain these assets with the utmost care and respect, avoiding waste, abuse, theft and neglect. Be aware of costs and alert to opportunities to improve performance while reducing them.

Delmont imaging's assets may only be used for legitimate business purposes. Use of Delmont imaging assets for any other purpose is permitted only with the approval of officials having the authority to permit such use.

Reporting misconduct and avoiding reprisals

We encourage all our employees to report deviations from the principles expressed in this commitment and illegal activities in the workplace, and we protect them against reprisals.

If you become aware of this, you must inform your manager, or if he or she is the cause, his or her line manager, or failing that, ethics@delmont-imaging.com and you must report any illegal activity, in particular any violation of laws relating to health devices, confidentiality laws, environmental laws or any other state or foreign law, rule or regulation to the appropriate regulatory authority.

You can make any report anonymously, but it may be easier to investigate if you identify yourself. And, of course, we will not be able to follow up if you do not identify yourself. Unless otherwise decided, the Quality Manager will be responsible for managing the investigation of any report of a breach of this commitment.

We will not tolerate retaliation against any person who, in good faith, raises a concern or complaint regarding compliance with this Commitment. Similarly, we will not tolerate retaliation against any person who participates in an investigation conducted in accordance with Company procedures or procedures available under any law. Any retaliation against an employee for having, in good faith, sought assistance or filed a report will be subject to disciplinary action up to and including dismissal.

Reliable professional practices

Quality policy and manufacturing reliability

We ensure the safety, quality and performance of our products to the highest level of certification available today. We have put in place a quality policy and a quality management system in accordance with international standard ISO 13485. All our teams are involved in implementing this system and must comply with it, from design to manufacture and disposal.

Compliance with public health legislation

We comply with the applicable regulatory requirements relating to public health, medical devices and clinical investigations in all the countries in which we operate. Our medical devices are only placed on the market once these requirements have been met. A corporate compliance officer is appointed for this purpose and is the point of contact for any questions from the authorities, staff and our partners.

Confidentiality of personal data

We respect personal data protection rights and inform individuals, companies and organisations about the collection and processing of their data. This is only permitted for specific and legitimate business purposes. We comply with the requirements of applicable national data protection laws and protect data from unauthorised access.

We will not use or disclose to any third party any personal information that is not considered to be in the public domain without express permission. We will protect such information from loss and keep it confidential internally unless dissemination or disclosure is properly authorised. This includes compliance with patient confidentiality laws, electronic trading laws and similar laws and regulations designed to protect the confidentiality and integrity of personal or sensitive information.

To this end, a data protection officer has been appointed and a confidentiality undertaking has been drawn up, which we invite our employees and partners to refer to. In the same way as this commitment, each employee of Delmont imaging must consult it and accept it on recruitment.

Respect and confidentiality of intellectual property

We respect the intellectual property rights of third parties. We will not knowingly infringe the copyrights, trademarks or patents of any party, nor will we unlawfully appropriate the trade secrets of any party.

Similarly, we must preserve and protect proprietary and confidential business information belonging to Delmont imaging, our customers, suppliers and others with whom we have contractual relationships. This intellectual property is an important asset that helps the company distinguish itself in a competitive business environment and is often the result of a significant investment of the company's resources.

Therefore, you must take steps to protect the Company's intellectual property and avoid infringing the intellectual property rights of others. Unauthorized disclosure is prohibited, even after you leave Delmont imaging. Similarly, it often happens that people have access to or retain confidential or sensitive information of their former employers. We expect employees to respect the trade secrets of their former employers and their legal obligations to them. Delmont imaging employees are prohibited from using their former employer's confidential or proprietary information in connection with their work for Delmont imaging.

To avoid unauthorized disclosure, never provide confidential information to an outside party or accept such information from anyone unless Delmont imaging has a binding confidentiality agreement with that party. Never discuss with an unauthorized person information that Delmont imaging considers confidential or that Delmont imaging has not made public. Furthermore, you must not discuss such information, even with authorized Delmont imaging employees, if you are in the presence of other unauthorized persons. Nor should you discuss this information with family members or friends, as they may innocently or unintentionally pass this information on to someone else.

Finally, Delmont imaging has the legitimate business objective of being a principal competitor in the market. However, all information relating to Delmont imaging's competitors must be obtained lawfully. Delmont imaging and its employees will not seek to obtain or accept confidential or competitive information through misrepresentation, coercion or illegal or improper means.

Import and export controls

As a company operating internationally, we comply with the laws and regulations affecting import and export activities. Failure to comply with these regulations can have very serious consequences for the company, including severe administrative and criminal penalties, seizure of goods and denial of export privileges.

Such trade may be subject to strict conditions, require a licence or other approval and may, in some cases, be prohibited. It is our policy not to do business, without the prior approval of our government, with countries or third parties that have been identified as being subject to import or export embargoes, restrictions, refusals or bans.

Nor must our products be sold, directly or indirectly, as dual-use goods to support prohibited activities such as the proliferation of chemical and biological weapons, missile or nuclear technology.

Money laundering controls

We comply with laws designed to monitor and control international payment transactions. We do not support the entry of illegally obtained money into legal money flows ("money laundering"). Payments of dubious origin (e.g. from high-risk countries) are screened before acceptance. Cash payments are not accepted.

Controlling corruption

We firmly reject all forms of bribery and comply with all applicable anti-corruption laws and regulations. We do not participate in the creation of illegal incentives in our business dealings with companies, governments and healthcare professionals for the purpose of obtaining or retaining business or influencing government actions or decisions.

We succeed in the global market solely on the basis of the technological leadership of our products, our customer focus and our competitive prices. None of our employees is permitted to offer or be offered personal gifts or other benefits to business partners. Employees should also be aware that anti-bribery laws are not limited to their actions alone, but also apply to the actions of third parties acting on our behalf.

When selecting third parties, you must exercise care and due diligence to ensure that we only work with third parties who are committed to meeting our ethical requirements.

In some countries, the exchange of courtesies such as modest gifts, hospitality and entertainment are an integral part of doing business. Even if permitted, the provision of gifts, meals and entertainment may not be made conditional, expressly or impliedly, on a customer agreeing to purchase or prescribe, or recommending the purchase of Delmont imaging products. Nor may they be used to reward a customer for purchasing or prescribing Delmont imaging products. Similarly, you must never accept an object intended to improperly influence your decision-making.

In addition, when dealing with healthcare professionals, it is important to remember that in many situations they can be considered as civil servants. Throughout the world, healthcare professionals work in state-run medical establishments and act as researchers or teachers in state-funded educational establishments. As such, these healthcare professionals are considered civil servants under anti-corruption laws.

Controlling conflicts of interest

Everyone can be subject to conflicts of interest and loyalty. We consider it very important to avoid them at Delmont imaging in order not to harm our business. We expect our employees to work loyally and faithfully for Delmont imaging and to avoid any conflict of interest at all times.

If you, or any of your family members or close friends, suspect that you have, or may have, a conflict of interest, you must disclose it. Your supervisor will work with you to determine whether you have a conflict of interest and, if so, how best to deal with it. Take the initiative to disclose whenever you have a potential or apparent conflict in order to protect your own interests, as well as those of Delmont imaging.

A conflict of interest occurs when your personal interest interferes, or appears to interfere, with that of Delmont imaging. You should avoid relationships that could interfere with your ability to make objective decisions and avoid benefits or rewards related to Delmont imaging business that are not provided by or known to Delmont imaging. For example, you should avoid all of the following:

- Significant financial interests or shareholdings in suppliers, service providers, customers or competitors,
- Any employment or consultancy agreement with suppliers, service providers, customers or competitors,
- Receiving gifts, entertainment or gratuities (other than nominal value) from any company or individual,
- Be in a position to supervise, review or exercise any influence over the job evaluation, salary or benefits of a close relative or a person with whom you have a close personal relationship within Delmont imaging,
- Be in a position to place or influence the business of Delmont imaging with a company in which you, your family or close acquaintances have an interest or a role in the management,
- Seizing business opportunities for your own personal benefit.

In addition, anything that presents a conflict of interest for you would probably also be a conflict if it involved a member of your family or someone with whom you have a close personal relationship.

If management determines that there is an existing or potential conflict, the resolution of that conflict may require :

- Refrain from the activity, interest or relationship in question,
- To terminate or sufficiently modify the existing activity, interest or relationship within a reasonable period of time,
- Be transferred to another workstation,
- To be dismissed from employment with the company.

Controlling conflict minerals

We are committed to conflict-free sourcing of minerals. This means that our sourcing of minerals such as tin, tantalum, tungsten, gold and their derivatives, used in the manufacture of our products, does not come from sources that directly or indirectly finance or facilitate armed conflict in the countries concerned, such as the Democratic Republic of Congo, Angola, Burundi, Central African Republic, Republic of Congo, Rwanda, Southern Sudan, Tanzania, Uganda and Zambia.

We expect our suppliers to take an appropriate approach to traceability data and other relevant measures. If they become aware of elements along their supply chain that lead to the conclusion that the objective of using conflict-free minerals is not being met, they will immediately inform Delmont imaging. Upon request, they must be able to provide certificates, declarations, reports, audit(s) (including reports received by the subcontractor from its subcontractors and sub-suppliers) and any other information to adequately support their claim that their products are free of conflict minerals.

Transparency with healthcare professionals

We respect the need for transparency in our relationships with healthcare practitioners. We are required under the laws of certain jurisdictions to publicly disclose certain payments and transfers of value to physicians and other healthcare entities with whom we collaborate, particularly for the research and development of our products.

To help ensure compliance with applicable disclosure laws, you must collect and timely file the required information in accordance with the company's transparency procedures.

Accuracy of company records

We account for our transactions in accordance with generally accepted accounting principles and represent that we do not falsify, disguise or misrepresent our accounting records. All books, records and accounts of the Company are maintained in accordance with all applicable accounting and financial regulations, standards and policies of Delmont imaging, and must fully and accurately reflect the true nature of the transactions they record.

This is mandatory regardless of whether such records reveal disappointing results or a failure to achieve expected profits. Any attempt to conceal actual operating results by inaccurately reflecting revenues, expenses, assets or liabilities cannot and will not be tolerated.

No undisclosed or unrecorded accounts or funds shall be established for any purpose. No false or misleading entries shall be made in the books and records of the Company for any purpose and no disbursement of funds of the Company or other property of the Company shall be made without proper vouchers.

Virtuous community relations

Relations between employees and Delmont imaging

As an employee, officer or director of Delmont imaging, you will be seen as a reflection of the company. You are expected to be loyal and faithful to the principles of honesty, integrity and fairness in order to give credibility to yourself and the company. Ethical decision-making requires an understanding of the Delmont imaging values and principles detailed in this Pledge, combined with good personal judgment.

Employee relations

We recognise the diversity of people and their individual differences and value them as an enrichment. Good teamwork between all employees, characterised by mutual respect, empathy and open and honest interaction with each other, is the basis of our success. We strive to offer all employees stimulating and fulfilling options for their personal and professional development.

We aim to employ people of integrity who we believe are capable of delivering superior performance over the long term. We expect all employees to accept and respect each other as equals, with an attitude of cooperation, courtesy and consideration.

Delmont imaging will not tolerate any unlawful conduct by an employee that harasses, threatens, disrupts or interferes with the activities of another employee or that creates an intimidating, offensive or hostile work environment.

If you find that circumstances beyond your control are preventing you from working peacefully, speak to your manager as soon as possible so that he or she can take corrective action. If it is your manager who is concerned, contact the Quality Manager.

Relations with our customers and users

Delmont imaging is proud of the strong and reputable relationships we have built with our customers and end-users. We are constantly working with them to meet their needs. These relationships are essential to our success.

We will compete fairly and ethically for all business opportunities. When we are involved in bid preparation or contract negotiations, all statements, communications and representations to potential customers must be complete and accurate. Once awarded, all contracts must be performed in accordance with the specifications and requirements of the contract.

Do not misrepresent or exaggerate the properties of our products or services, even if an honest representation means potentially losing a sale. If silence about a fact could mislead a customer, disclose the information. Communicate clearly and accurately so that customers understand the features and benefits, but also the limitations, of our products.

Relations with the scientific and medical community

We are committed to working with healthcare professionals and the scientific community to advance the most virtuous medical practices for patients and public health in general. We will always choose patient benefits in the short and long term, even if this means lower economic returns for Delmont imaging.

Our interactions with healthcare professionals, which include doctors, nurses, hospital or medical practice administrators, are conducted in accordance with strict applicable regulations and must serve an appropriate and ethical scientific or commercial purpose and must not interfere with the independent medical judgement of the healthcare professional.

Relations with our suppliers and business partners

We expect third parties with whom we work to comply with applicable legislation, to adhere to ethical business practices and to meet the requirements set out in this commitment, particularly in relation to labour, health, safety and the environment. In selecting and dealing with our business partners, we will also act in accordance with the anti-discrimination principles set out above.

Our suppliers are an important part of Delmont imaging's ability to create superior products and services for our customers. We require our suppliers to be people of integrity and to produce components of excellent quality, with on-time delivery and at competitive prices. Delmont imaging will always use the most ethical business practices in the selection of sources, negotiation and administration of all our purchasing activities.

We recognise that serious breaches of our ethical commitment will not be tolerated by our suppliers and subcontractors and may result in the termination of our contract with them.

Relations with our competitors

We compete vigorously but fairly. We declare that we recognise and will act in accordance with the principles of free competition. We will operate with fair business practices in compliance with all applicable antitrust laws.

We will not engage in illegal activities such as price fixing, customer allocation, agreements to limit production, monopolies and cartels or boycotts or any other agreement that improperly restricts competition or interferes with the ability of the free market system to function properly. A formal agreement with a competitor is not necessary to prove a violation of antitrust laws. A general discussion followed by joint action is often sufficient to demonstrate the existence of an agreement.

Communications with competitors must be avoided unless they relate to a legitimate business venture or an authorised trade association activity. You must not engage in any communication with a competitor that could result, or even appear to result, in price fixing, customer or market allocation, boycotts or production limitations.

We protect the company's reputation and integrity through exemplary competitive behaviour that complies with the law. Business activity that benefits everyone in the long term can only exist on the basis of free and fair competition, and when the law is rigorously respected.

Compliance with the rules of free and fair competition also applies to trade fairs and association meetings. All employees are required to put an immediate end to conversations with competitors and, if necessary, to leave meetings immediately if they do not comply with the rules of free and fair competition. Participation, even passive, in such meetings must be stopped immediately and active disagreement must be expressed with everything that has been agreed.

Relations with the authorities

We must conduct our business in compliance with all applicable laws and regulations. As a manufacturer and supplier of medical devices, Delmont imaging is subject to additional laws and regulations designed to protect patients and improve the quality of healthcare services. Each of us is personally responsible for complying with these obligations. Managers must ensure that employees are aware of the requirements of the law and understand the importance of

complying with them. We undertake to cooperate with all legitimate government investigations, inspections and requests for information.

If you are contacted by a government authority in any country with such a request, the regulatory department must be informed so that it can ensure that we provide an appropriate response in accordance with the law.

It is important to note that, as you will understand from the rest of this Code of Conduct, compliance with the law is not the whole of our ethical responsibility, but compliance with the law is a minimum and absolutely essential condition for the performance of our duties.

Relations with independent auditors

We welcome all auditors likely to work for Delmont imaging in the best possible conditions, whatever the applicable audit framework, be it certification, regulatory or tax-related.

No employee, officer or director shall, directly or indirectly, knowingly make a false or misleading statement or omit to state a material fact to any person in connection with an audit. In addition, no employee, officer or director shall, either directly or indirectly, take any action to coerce, manipulate, deceive or fraudulently influence any independent auditor in the performance of an audit.

Information and entry into force

This policy is communicated individually to each employee when they are hired and annually during their personal interview. Any questions can be addressed to policies@delmont-imaging.com.

Please take the time to familiarise yourself with this policy. It is a resource to help you understand our principles and values, so that you know what is expected of you as a representative of the company, and also our partners, so that they know what they can expect from us.

If you find yourself in a situation that you believe may violate this policy, or if you have any questions or concerns related to this policy, please speak promptly to your manager or the Quality Manager. When in doubt, the company wants you to come forward and will not tolerate retaliation against anyone for coming forward. It is the responsibility of all employees to help ensure compliance with this policy.

