

Human Rights Policy

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Content

Section 1	Purpose	Page 2
Section 2	Scope	Page 2
Section 3	Policy Elements	Page 2
Section 4	Governance	Page 4

1. Purpose

The purpose of this policy (the “**Policy**”) is to establish the commitments and general principles related to the respect and promotion of human rights within Almirall’s business activities and business relations along the value chains, in order to prevent its activities and commercial relations from provoking or contributing to generate negative human rights repercussions.

2. Scope

This Policy applies to Almirall, S.A. and all the legal entities of Almirall group (altogether, “**Almirall**” or the “**Company**”) and their respective employees involved in the relevant activity. In the event that an external third party is engaged by the Company to represent or work on behalf of the Company, they should know and abide by this Policy to the extent applicable.

3. Policy elements

3.1. Commitments and general principles

Almirall endeavours not to participate in or be complicit in actions that compromise or jeopardize the universal human rights recognized in national and international legislation. This Policy is based on the principles of the United Nations Universal Declaration of Human Rights, the International Labor Organization (“**ILO**”) Conventions, the ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises. As a signatory to the United Nations Global Compact, Almirall is firmly committed to its Ten Principles.

Almirall’s commitment to respecting and promoting human rights spans various areas within the Company’s scope of action, particularly in its relationship with employees, suppliers and other partners, patients and society in general.

3.1.1. Commitments towards employees

Employees are the foundation of the Company's success. Therefore, Almirall commits to:

- a. Not accept any type of discriminatory behaviour based on race, age, gender, nationality, social origin, marital status, sexual orientation, political opinions, religion or any other personal, physical or social condition of its employees and having the necessary procedures to report it, address it and act in such cases.
- b. Reject forced labour in all its forms and any manifestation of physical, sexual, psychological or moral harassment, abuse of authority or any other conduct that creates an intimidating or offensive environment for the rights of individuals, and to have the necessary procedures to report it, treat it and act in cases where necessary.
- c. Reject child labour in any of the Company's activities in any territory. The provisions of the International Labour Organization regarding the

- minimum age established to work, as well as the regulations of each country, will be respected in all of the Company's hiring processes.
- d. Recognise the right of employees to enjoy a dignified, safe and healthy work environment. Almirall promotes the dissemination and reinforcement of a culture of safety, developing awareness of risk, and encouraging responsible behaviour on the part of its employees.
 - e. Promote diversity and inclusion, as well as employees' wellbeing.
 - f. Guarantee the right to freedom of affiliation, association and the effective recognition of the right to collective bargaining.
 - g. Defend freedom of opinion, information and expression, respecting the diversity of opinions in the Company and promoting dialogue and communication.
 - h. Offer decent working conditions, with adequate remuneration and hours, and fair and equal treatment by avoiding different or less favourably treatment of people due to characteristics that are not related to their merit or the requirements inherent to the work.
 - i. Investigate and address any behaviours impacting human rights reported by Almirall employees through the SpeakUp channel or other mechanisms within the internal reporting system.

3.1.2. The commitment of our suppliers and other business partners

Almirall has a wide and diverse range of suppliers, including raw material suppliers and manufacturers, service providers, contract research organisations (“CROs”) and other business partners. All members of Almirall's supply chain are expected to operate their businesses responsibly, transparently, sustainably and ethically, respecting human rights and ensuring that modern slavery is not taking place in any part of its supply chain or in any part of its business. Through appropriate contractual agreements and procurement processes, Almirall ensures that consultants, agents, contractors and suppliers are aware of and duly comply with the principles set out in the Almirall Supplier Code of Conduct, which sets out the Company's human rights commitments, including those of their respective employees at all stages of the supply chain.

Suppliers and other business partners must respect and defend the human rights of their direct and indirect employees, treat them with dignity and respect and comply with all the commitments assumed in the [Almirall Supplier Code of Conduct](#) that reflects Almirall's human rights standards. This includes prohibition of child labour, non-abuse and non-harassment of psychological, sexual or verbal nature, prohibition of corporal punishment, adequate conditions of employment and freedom of association and collective bargaining, among others.

Almirall has a sustainable procurement programme that includes human rights auditing of its suppliers to continuously improve working conditions in their supply chains. The Company performs due diligence to prevent and mitigate negative human rights impacts in its value chain and monitors the results of such audits and implements action plans to assist its suppliers in complying with applicable laws and processes.

The Company expects all of its suppliers to act as a first line of defence for human rights, reporting any potential impact thereon through the SpeakUp channel or other mechanisms within the internal reporting system.

3.1.3. Commitment to our patients and healthcare professionals

As a biopharmaceutical company, Almirall is firmly committed to the healthcare community, in particular to its patients. Therefore, Almirall commits to:

- a. Protect the human rights, privacy, data protection and safety of its patients.
- b. Protect the human rights, privacy, data protection and safety of people participating in clinical trials. Almirall ensures compliance with all international and local legal requirements, and the CROs with which Almirall works are required to do the same, establishing controls in this regard. The guidelines of the Declaration of Helsinki, the European Regulation on the protection of personal data, as well as Good Laboratory Practices (GLP) and Good Clinical Practices (GCP) are strictly observed in clinical trials, which are also carried out in accordance with internal processes focused on protecting participants' rights.

3.1.4. Commitment to society and our communities

Almirall is committed to respect the economic, social and cultural rights of the members of the communities in which it operates and promotes social initiatives and activities that benefit society.

3.2. Compliance and monitoring

To identify, prevent, mitigate and respond to potential negative consequences on human rights deriving from its operations, Almirall carries out a continuous due diligence process in its direct and indirect activities with the aim of not violating and respecting the rights of the agents involved and ultimately redress any impacts if they occur.

For that, Almirall conducts regular human rights' risk assessments in its operations and supply chain to identify potential risks and impacts and implement appropriate actions to prevent and mitigate human rights risks. Finally, Almirall establishes grievance mechanisms and provides appropriate remediation and compensation for any human rights violations.

3.3. Human Rights Management: Roles and responsibilities

- **Corporate Sustainability Committee:** The Sustainability Committee shall report to the Company's Management Board and has the mission and responsibilities described in the Corporate Governance Policy, including human rights-related aspects.
- **Senior Leadership:** anticipation and prevention of any risks associated with human rights is the responsibility of the Senior Leadership. In addition, a continuous due diligence process is carried out to ensure that the rights of consumers and patients are always respected in all operations and services offered by the Company.
- **Area Directors and affiliates' General Managers.** It is the responsibility of the Directors of each department or area of activity of the Company (the General

Managers or Country Managers in the case of subsidiaries) to ensure the integration and application of the basic principles contained in this Policy in their respective fields of competence.

- **All employees:** The prevention and anticipation of any risk associated with human rights is the responsibility of all personnel, positions, departments, committees and organizational units of Almirall.

4. Governance

Corporate Policy Sponsor: Chief People & Culture Officer
Corporate Policy Owner: Executive Director, Global Sustainability

All employees are required to report any suspected violation of this Policy in accordance with the Almirall Code of Ethics and other internal guidelines. Suspected violations can be reported to the employee's direct manager, to People & Culture, the local Compliance or Legal representative or through the [SpeakUp! channel](#).