

Corporate Sustainability Policy

Effective date	19/07/2024
Approved use	Approved for external dissemination

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1. Purpose

The purpose of this Policy is to establish the general framework of activities for the management of the sustainability practices undertaken by Almirall deriving from the 2030 Sustainability Strategy approved by the Almirall’s Board of Directors and overseen by the Audit Commission.

2. Scope

This policy applies to Almirall, S.A. and the legal entities in its group (altogether, “Almirall”) and their respective employees involved in the relevant activity or facility.

3. Policy elements

3.1. Definition of Sustainable Development and Sustainability

Sustainable development is defined as “meeting the needs of the present without compromising the ability of future generations to meet their own needs”. In the corporate context, sustainability means that companies need to not only focus on financial performance but also need to take into account the risks and opportunities associated with the social and environmental impacts they may have in their own operations and along the full value chain.

3.2. General principles

The following business conducts generally adopted by Almirall shall also apply to the execution of our sustainability strategy:

- Alignment of all conducts with the principles contained in the Code of Ethics and other internal rules, which determine the expectations of all Almirall’s employees in the execution of their activities.
- Protection and respect of the universally recognized fundamental human rights within the scope of influence of Almirall and the principle of non-complicity in their violation.
- Communication and dialogue with main stakeholders through diverse communication channels, promoting relationships based on mutual trust.
- Transparency in the disclosure of information about Almirall's performance and activities and responsible communication practices to ensure reliability of information and to protect Almirall's integrity and reputation.
- Proactive management of non-financial risks and opportunities derived from markets and the business operational context.
- Reduction of the environmental impact of its activities in the areas where it operates, promotion of sustainable development and efficient management of natural resources.

3.3. Main stakeholders

- **Employees:** Almirall shall work to attract, promote and retain talent and train its employees to grow and develop their potential.

- **Health sector, scientific and academic community and patients:** Almirall's relationship with professionals in the health sector, and with the scientific community in general, shall be governed by the principles of transparency, proximity and cooperation, based on understanding the needs of these groups in order to carry out joint programs and projects that contribute to improving people's health and wellbeing.
- **Regulatory bodies, governments, administrations:** The company shall engage with regulators, governments and administrations globally as appropriate about the manufacture, development, review, approval and marketing of its products following the applicable regulations.
- **NGOs and other foundations:** Almirall shall partner with non-governmental bodies relevant to its sustainability priorities, to promote social action initiatives and employee participation in volunteering initiatives in these areas.
- **Shareholders, investors, financial institutions and auditors:** the company shall follow the applicable standards in its relationship with shareholders, investors, financial institutions and auditors.
- **Suppliers and other value chain partners:** the company shall operate with and expect from its providers the respect for the law and contractual commitments undertaken, the quality of the service and the good faith that constitute the basis of a valuable relationships between Almirall and its providers.
- **Society:** Almirall shall develop awareness of its surroundings and social needs of the different countries in which it operates.

3.4. Sustainability at Almirall

Sustainability is more than just a commitment; it's a fundamental pillar of Almirall's strategy to create long-term value and a foundational factor on how the company plans to achieve its Purpose of transforming their patients' worlds by helping them realise their hopes and dreams.

Sustainability shall be integral to the company's vision, values, strategy and operations. It shall be embedded in its business strategies and its way of doing business, covering Almirall's entire value chain including sourcing, own operations, and products and services sold.

Almirall's actions for impact shall be developed and executed under four strategic pillars - Planet, People, Patients and Partners – and a fifth overarching pillar Principles, which shall govern behaviours across the company.

3.5. Overview of main Sustainability pillars

All sustainability-related material impacts, risks and opportunities identified¹ and included in the sustainability strategy of the company will follow under these five pillars:

Through **Planet**, Almirall shall take actions on climate through its science-led, delivering energy decarbonization and energy efficiency, sustainable mobility and net zero supplier engagement plans. Almirall shall also act on other key environmental vectors by promoting actions towards pollution prevention, water stewardship, circular economy and sustainable use of resources, and nature protection.

Through **People**, the company shall focus on implementing a strong global diversity, equity and inclusion plan, enhancing its talent management to unleash employees' full potential, fully implement its corporate holistic Wellbeing Programme, as well as ensure the maximum level of health and safety in the workplace, and deploy a corporate volunteering programme.

¹ An Impact, Risk and Opportunity Assessment is carried out periodically to ensure relevance of material topics identified.

The **Patients** pillar shall allow Almirall to strengthen its commitment to patients through its patient organizations engagement plan with a special focus on the wellbeing of people with skin diseases. Almirall shall embed a Patient Centric Mindset across the company.

Through **Partners**, Almirall shall deploy its sustainable procurement programme, ensuring effective governance and the respect for internationally recognised human and labour rights and reinforcing sustainability-related aspects across its value chain.

All of this shall be done whilst ensuring an ethical and transparent culture, applying a strong governance, and acting with good behaviour **Principles**. Almirall shall provide up-to-date information required by the applicable laws for corporate matters and other information considered relevant for investors and auditors and use a variety of communication channels that enable shareholders and the investor community to access it in an easy and appropriate way.

3.6. Sustainability Targets, Measurement and Link to Compensation

Almirall shall set measurable sustainability targets that are in line with the United Nations' (UN) Sustainable Development Goals for 2030 (SDGs) and the Climate Goals of the Paris Agreement.

The targets shall be measured via Key Performance Indicators (KPIs) and described as appropriate in the non-financial information or sustainability report, annual report and on the company's website. The Board of Directors of Almirall shall be responsible for the approval of such KPIs.

Sustainability targets shall be linked to the variable remuneration of key internal stakeholders including all members of the Management Board, Senior Leadership, individuals with sustainability direct responsibilities, both for the short and the long term.

3.7. Sustainability Management: Roles and responsibilities

- **CEO:** The CEO shall be responsible for the supervision and coordination of all activities related to sustainability and, specifically, for approving the plans, the necessary management and control measures, and for overseeing the different programs and initiatives.
- **Corporate Sustainability Committee:** The Corporate Sustainability Committee shall report to the company's Management Board and has the mission and responsibilities described in the company's Corporate Governance Policy. The Chairman of the Corporate Sustainability Committee shall be the Chief People & Culture Officer, the Secretary being the Global Sustainability Executive Director.
- **Global Sustainability Executive Director:** The Global Sustainability Executive Director, reporting to the Chief People & Culture Officer, shall be responsible for the management and supervision of all sustainability-related aspects in coordination with the departments involved.
- **Area Directors and affiliates' General Managers.** As a general rule, 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 principles contained in this Policy in their respective fields of competence.

3.8. Relationship with other Corporate Policies

This policy is aligned with and is complemented by some other Corporate Policies such covering human rights, risk control, People & Culture, health, safety and environment, Global Procurement, anti-bribery and anti-corruption, among others. This Policy takes into account recommendations 53, 54 and 55 included in the Code of Good Governance of Listed Companies approved in June 2020.

4. Governance

Corporate Policy Sponsor: Chief People & Culture Officer		
Corporate Policy Owner: Executive Director, Global Sustainability		
Overview of changes	Version	Effective Date
	1	19/07/2024

All employees are required to report any suspected violation of this Policy in accordance with 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](#).