



# Consolidated Statement of Non-Financial Information and Sustainability Information of Almirall S.A. and Subsidiaries for 2024

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## 1. Introduction to the company

Almirall is a leading skin-health focused global pharmaceutical company that partners with healthcare professionals, applying science to provide medical solutions to patients and future generations. Founded 80 years ago and with headquarters in Barcelona, Almirall is listed on the Spanish Stock Exchange (ticker: ALM).

Almirall has become a key element of value creation for society, thanks to our commitment to our main shareholders and our decision to help patients by understanding the problems and challenges they face and using science to offer solutions applicable to real life. In 2019, Almirall defined its Purpose: "Transform the patients' world by helping them to make their hopes and dreams for a healthy life come true", which reflects our *raison d'être* as well as our essence today and for future generations. This Purpose conveys the goal of improving our patients' lives by focusing on their well-being. It is Almirall's legacy, the mark we will leave for future generations and our contribution to society.

Almirall's values are the basis upon which an organization is built, in which workers feel empowered as key players in the evolution of the company. These values drive the Almirall team and inspire us to work diligently day after day, leverage our knowledge and skills, to find effective solutions and improve patients' quality of life.

Almirall has refocused its strategy in skin health to better address unmet patient needs. We invest in innovation and substantially differentiated dermatology products to provide real solutions that improve patients' lives. We offer a wide range of medical solutions aimed at fighting skin diseases, helping people to improve their health.

With decades of investment in cutting-edge science and innovation behind us, at Almirall we're committed to continuing to develop our capabilities into the future. A collaborative mindset enables us to work closely with leading experts around the world to innovate and develop new technologies. Located in Barcelona, the hub for biomedical science and health innovation, Almirall's pharmaceutical R&D center is dedicated exclusively to skin health. Here, the team of leading scientists and experts in innovation are advancing their knowledge of skin science and identifying new skin treatment options by means of a variety of technologies.

Almirall generates its revenues mainly through its skin health product lines, offering a wide range of medical solutions to combat skin diseases. Our product portfolio is also complemented by therapeutic divisions that are divided into: central nervous, cardiovascular, gastrointestinal and musculoskeletal systems. Although Almirall generates income through the production of chemical products, this is minor, as the bulk of chemical production is for use in our in-house pharmaceutical production (more detail on this can be found at 4.2 "European Taxonomy"). Set out below is a breakdown of the Group's net revenue by geography and therapeutic area, as also presented in the Group's Annual Accounts for the financial year ended 31 December 2024:

	Thousands of Euros	
	2024	2023
Spain	305,232	296,916
Europe and Middle East	576,012	491,567
America, Asia and Africa	104,477	106,033
<b>Net turnover</b>	<b>985,721</b>	<b>894,516</b>

	Thousands of Euros	
	2024	2023
Dermatology and others	548,025	465,248
Gastrointestinal and metabolism	98,179	110,735
Respiratory	92,718	86,809
Cardiovascular	89,422	86,130
Central nervous system	82,441	74,800
Musculoskeletal	39,826	31,809
Other therapeutic specialties	35,110	38,985
<b>Net turnover</b>	<b>985,721</b>	<b>894,516</b>

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Finally, pursuant to the requirements of the CSRD (Corporate Sustainability Reporting Directive) on Sustainable Business Model disclosures (SBM-1), Almirall is not involved in the production or marketing of controversial weapons, the cultivation and production of tobacco, in the fossil fuel sector (coal, oil and gas) nor does it offer products or services that are prohibited in certain markets, therefore, it does not generate revenues deriving from these activities.

## 2. Governance

### 2.1. Corporate Governance

Corporate governance at Almirall is guided by the Group's Purpose (see section 5.1 "The Almirall Culture" for further details), which reflects the *raison d'être* and permanent essence of the company. The aim is to ensure that the management model and the decisions taken by the Board of Directors and its committees uphold the long-term interests of the different stakeholders and guarantee the company's sustainability.

The critical elements are a model based on the law and governance best practice, transparency, shareholder protection and clear accountability.

The Purpose and the company's corporate values are guaranteed not only through the systems established to comply with existing laws and regulations (as well as the governance best practice) applicable to Almirall but also by leading with levels of transparency that allow us to gain the trust of patients and healthcare professionals, as well as other stakeholders such as, for example, employees, shareholders, investors, regulatory authorities, the sector as a whole and the media, etc.

The internal corporate standards (corporate policies and their standard operating procedures) also determine the regulation of Almirall's essential corporate governance guidelines, which are periodically reviewed and updated to adapt to regulatory changes and best practices. In this regard, new corporate policies have been approved for 2024 and are available on the company's intranet as well as on the Group's corporate website: <https://www.almirall.es/politicas-corporativas>.

#### 2.1.1. Board of Directors

The Board of Directors carries out its duties with unity of purpose and independence, treating Almirall's shareholders equally and always guided by the interests of the company, with an absolute commitment to maintaining and protecting its value. It also oversees full compliance with laws and regulations, as well as compliance in good faith with its obligations and contracts, fully respecting the good practices of the sectors and territories where Almirall operates, and always complying with the principles of sustainability and social responsibility that the company has voluntarily integrated into its strategic objectives.

As at 31 December 2024, the Board of Directors comprises ten directors: one Executive Director, eight Independent Directors and one Proprietary Director, in addition to the non-director Secretary and the non-director Vice-Secretary.

The Directors are: Carlos Gallardo Piqué (Chairman and Chief Executive Officer), Enrique de Leyva Pérez (Vice-Chair, Coordinating Director and Independent Director), Karin Louise Dorrepaal (Independent Director), Seth J. Orlow (Independent Director), Alexandra B. Kimball (Independent Director), Eva-Lotta Allan (known as Eva-Lotta Coulter) (Independent Director), Ruud Dobber (Independent Director), Ugo di Francesco (Independent Director), Eva Abans Iglesias (Independent Director) and Antonio Gallardo Torrededía (Proprietary Director). Of the total number of Directors, 80% are Independent Directors and 40% are women.

The non-director Secretary is Daniel Ripley and the non-director Vice-Secretary is Isabel Cristina Gomes.

During the 2024 financial year, Tom McKillop resigned as an External Director and consequently as Vice-Chair of the Board of Directors and member of the Appointments and Remuneration Committee. Ugo di Francesco and Eva Abans Iglesias were also appointed as Independent Directors.

Information concerning the experience of all Board members is also available on the company's corporate website (<https://www.almirall.es/consejo-administracion>).

#### 2.1.2. Board Committees

There are four Committees of the Board of Directors: the Audit Committee, the Appointments and Remuneration Committee, the Dermatology Committee and the Governance Committee. Each of them operates with clear and defined roles, and their activity is regularly reviewed to ensure that the proposed objectives are achieved.

The committees meet quarterly and report their activities to the Board of Directors at each meeting.

### **Audit Committee**

The Audit Committee is responsible for reviewing the company's regularly published financial and non-financial information, ensuring compliance with all legal requirements and the correct application of current accounting standards. It also supervises the internal audit system, internal control systems and activities related to risk control and management, in addition to constant interaction with the external auditors.

The Audit Committee also assumes the functions related to oversight of all matters relating to sustainability and ESG, ethics and compliance, information security and cybersecurity.

Almirall implements both an internal audit function and an annual external audit process to ensure the integrity and accuracy of all the information it publishes. Similarly, an important function of the Committee is management of the company's risks, which it does by supervising a management project that has been in place for many years, on the basis of which all operational risks are assessed and other risks, such as reputational, sustainability, cybersecurity and information security risks, are duly managed.

The Audit Committee is composed of four directors, all of whom are non-executive directors, three of whom are independent directors and one of whom is an external proprietary director. The Committee President is elected from among the independent directors. This director must be replaced every four years and may be re-elected after a period of one (1) year has elapsed since leaving office. The duties of Secretary are performed by a non-member of the Committee. The Committee normally meets on a quarterly basis to review the periodic financial information to be submitted to stock market authorities and the information the Board of Directors must approve and include in its annual public documentation. It also meets at the request of any of its members and whenever convened by its President, who must do so whenever the Board or its President requests the issuance of a report or the adoption of proposals and, in any case, whenever it is appropriate for the proper performance of its functions.

In addition to the foregoing, the functions of the Audit Committee include:

- Giving an account of its activities and reporting on its work to the first plenary session of the Board of Directors following its meetings.
- Taking minutes of its meetings, copies of which it must send to all the members of the Board.
- Preparing an annual report on its activities, highlighting any relevant incidents that may have arisen in relation to its duties. In addition, when it deems it appropriate, it includes in this report proposals for improving the company's governance rules.
- Calling on, or even ordering, any of the members of the Company's management team or staff to appear without the presence of any other manager. Likewise, it may require the attendance of the auditors at its meetings.
- Seeking the advice of external experts when it deems it necessary for the proper performance of its duties.
- Supervising compliance with the company's corporate governance rules and internal codes of conduct, and ensuring that the corporate culture is aligned with its Purpose and values: in particular, establishing and supervising a mechanism that enables workers to report, confidentially and, if possible and deemed appropriate, anonymously, any potentially significant irregularities, especially those related to criminal, financial and accounting matters, that they become aware of within the Company (see section 2.2.4 "Prevention and detection of corruption or bribery" for further details).

In 2024, the Committee reviewed, amongst other matters, the company's periodic financial information, the most relevant operations, sought the opinion of external auditors, continuously monitored the company's main risks, reviewed the Group's Sustainability goals up to 2050, monitored the updating of the Information Security Program carried out and reviewed the observations and recommendations derived from the internal audit reports as well as compliance with its activity plan.

### **Appointments and Remuneration Committee**

The Appointments and Remuneration Committee oversees the selection process and the Remuneration Policy for Members of the Board of Directors and Senior Management of the company and its subsidiaries, as well as supervising and coordinating the global strategic activities of Almirall's People and Culture area.

The Appointments and Remuneration Committee is responsible for formulating and reviewing the criteria to be followed regarding the composition of the company's management team and its subsidiaries. It is also responsible for selecting candidates and evaluating their skills, knowledge and the experience required for the



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members of the Board of Directors, ensuring compliance with the Remuneration Policy, as well as reviewing potential conflicts of interest.

The Appointments and Remuneration Committee is made up of three independent directors. The members of the Appointments and Remuneration Committee are appointed taking into account their knowledge, skills and experience, as well as the duties of the Committee. The President of the Appointments and Remuneration Committee is an independent Director elected from among these directors. The duties of Secretary are performed by a non-member of the Committee. The Appointments and Remuneration Committee meets quarterly (normally). It also meets whenever convened by its President, who must do so whenever the Board or its President requests the issuance of a report or the adoption of proposals and, in any case, whenever it is advisable for the proper performance of its duties. The Committee must report on its activities and be accountable for its work to the first plenary session of the Board of Directors following its meetings. The Committee must take minutes of its meetings, copies of which it must send to all the members of the Board. The Committee must consult with the Chairman and Chief Executive Officer of the Company, especially on matters relating to executive directors and Senior Management. The Appointments and Remuneration Committee may seek the advice of external experts when it deems it necessary for the proper performance of its duties.

Notwithstanding other duties that may be assigned to it by the Board of Directors, the Appointments and Remuneration Committee has the following basic responsibilities:

- Formulate and review the criteria to be followed for the composition of the management team of the company and its subsidiaries, as well as for the selection of candidates.
- Report and submit to the Board of Directors the proposed appointments of directors, Senior Management and Senior Leadership so that the Board may proceed with their appointment.
- Report to the Board regarding issues of gender diversity and director qualifications.
- Propose to the Board of Directors the remuneration policy for directors and general managers or for those who perform their senior management duties under the direct supervision of the Board, executive committees or managing directors, as well as the individual remuneration and other contractual conditions for executive directors, ensuring that they are complied with.

Among other matters, the new Remuneration Policy for Members of the Company's Board of Directors was favorably evaluated during the 2024 financial year, after submission for approval by the Board of Directors and the Shareholders' Meeting. The policy, available on Almirall's website, was designed with the advice of corporate governance experts and with the objective of attracting and retaining talent on the Board, ensuring a remuneration scheme that is aligned with the dedication and responsibilities of the directors. It is governed by a series of key principles:

- Independence: The remuneration structure must respect the autonomy of non-executive directors.
- Competitiveness and Retention: The compensation will be competitive to attract relevant talent.
- Long-Term Sustainability: The policy is geared towards long-term sustainability and profitability, avoiding excessive risk-taking.
- Transparency and Fairness: The remuneration must be clear, proportionate and fair, taking into account the dedication and responsibility of each director.
- Regular Review: The Appointments and Remuneration Committee reviews and adjusts the policy periodically, proposing changes to the Board for approval at the General Meeting.

During the 2024 financial year, Tom McKillop's resignation as an External Director, and consequently as Vice-Chair and member of the Appointments and Remuneration Committee, was acknowledged and the proposed appointments of Ugo di Francesco and Eva Abans as independent directors of the Company were approved.

### **Dermatology Committee**

The Dermatology Committee verifies and discusses Almirall's medical dermatology strategy and oversees activities related to implementation of this strategy, as well as relevant R&D and business development projects before the Board of Directors decides on them.

The Dermatology Committee is composed of three Directors, one of whom is the Executive Director and the other two are Independent Directors. The duties of Secretary are performed by a non-member of the Committee.

The Dermatology Committee usually meets quarterly. It must also meet whenever convened by its President, who must do so whenever the Board of Directors or its President requests the issuance of a report or the

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adoption of proposals and, in any case, whenever it is advisable for the proper performance of its duties. Similarly, the Committee must take minutes of its meetings, copies of which it must send to all the members of the Board. The Board of Directors deliberates on the proposals and reports submitted to it by the Committee. The Dermatology Committee may seek the advice of external experts when it deems it necessary for the proper performance of its duties.

Its most important activities during the 2024 financial year were related to the review of potential business development operations, as well as the evaluation of R&D Innovation Roadmap 2.0 projects, for the 2025-2027 period.

### **Governance Committee**

The Governance Committee is composed of three Directors: the Coordinating Director and two other Independent Directors. The duties of Secretary are performed by a non-member of the Committee.

The Governance Committee has the following responsibilities:

- Advise the Coordinating Director in relation to the possible convening of the Board of Directors, as well as in relation to the inclusion of new items on the agenda of an already convened Board of Directors meeting.
- Advise, inform and provide support to the Coordinating Director in (i) the coordination and meeting of the non-executive directors and the transfer of the concerns received from them to the competent bodies; (ii) the management, where appropriate, of the periodic evaluation of the Chairman of the Board of Directors when he or she is an Executive Director, identifying any emergence of conflicts of interest or situations of lack of transparency; (iii) the contacts held with investors and shareholders to ascertain their points of view in order to form an opinion about their concerns.
- Analyze and review the governance assessments made by external agents such as proxy advisors and recommend appropriate measures to the Board of Directors.
- Hold meetings and maintain a direct and fluid dialogue with the areas of the Company in charge of Compliance and Governance
- Inform and support the Coordinating Director with respect to the coordination of the Chairman's succession plan, as well as advise and support the Coordinating Director with respect to the chairmanship of the Board of Directors in the absence of the Chairman and the Vice-Chairs, if any.

The Governance Committee ordinarily meets once every quarter and may also meet whenever convened by its President, who must do so whenever the Board or its President requests the issuance of a report or the adoption of proposals and, in any case, whenever it is advisable for the proper performance of its duties. The Committee must take minutes of its meetings, copies of which it must send to all the members of the Board of Directors. The Governance Committee may seek the advice of external experts when it deems it necessary for the proper performance of its duties.

Its most important actions during 2024 were the monitoring of the Investor Relations department's interactions with proxy advisors and investors, as well as the monitoring of the Company's key Corporate Governance milestone updates.

### **2.1.3. Corporate Committees**

The Corporate Committees are understood to be the Management Board and any other executive body to which the Management Board expressly delegates part of its functions.

#### **Management Board**

Almirall's Management Board is the internal committee that leads the company's executive management, led in turn by the Chief Executive Officer, and it represents the most important areas of the organization, defining the company's long-term objectives and strategies, establishing the principles and approving the contents of Almirall's various internal corporate policies, not reserved for approval exclusively by the Board of Directors.

The mission of the Management Board encompasses the following responsibilities:

- Directing all strategy and strategic decisions of the company not expressly reserved for the Board of Directors, in accordance with the general responsibilities and guidelines established by the Board of Directors or delegated by it to the Chief Executive Officer;
- Taking all extraordinary organizational decisions not expressly reserved for the Board of Directors or delegated to another committee, body or person;

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- Managing the organization in accordance with the general responsibilities and guidelines established by the Board of Directors or delegated by it to the Chief Executive Officer;
- Maximizing the strategic value of Almirall's personnel management policies and work environment.

The members of the Management Board are the Chief Executive Officer, who chairs the Committee, the Chief Financial Officer, the Chief Scientific Officer, the Chief Industrial Operations Officer, the Chief People & Culture Officer, the Chief Medical Officer, the Chief Commercial Officer Europe & International, the Chief Marketing Officer, the Chairman and General Manager of Almirall US and the Chief Legal Officer & General Counsel, who also acts as Secretary of the Committee.

Information concerning the experience of all Management Board members is also available on the company's corporate website.

There are also other internal committees, which are set out in detail below.

### **R&D Portfolio Committee**

Is responsible for (i) overseeing and approving the overall R&D strategy within the economic limits established by the Management Board, and under the guidance of the Board of Directors and the approved R&D Innovation Roadmap; (ii) overseeing the approval and prioritization of internal and external R&D projects; and (iii) monitoring and managing the progression of R&D projects and/or their completion from inception to launch.

### **R&D Scientific Committee**

Is responsible for reviewing projects from a scientific and medical point of view before submitting them to the R&D Portfolio Committee for approval.

### **Drug Safety Committee**

Oversees the pharmacovigilance and clinical safety activities of all Almirall's investigational and authorized drugs to ensure compliance with regulatory requirements, business needs and appropriate benefit/risk assessment throughout the product life cycle with the ultimate goal of protecting patient health. See section 5.4.3 "Patient health and safety" as tools to ensure product quality, health and consumer safety" for more details.

### **Quality Committee**

Establishes and preserves Almirall's commitment to quality, ensuring the correct functioning of the pharmaceutical quality system and guaranteeing that the quality of the products developed, manufactured and marketed by Almirall comply with the applicable health regulations.

### **Corporate Governance Committee**

Its functional scope includes corporate governance, corporate defense, risk management and internal auditing, as well as oversight in matters of compliance, cybersecurity and sustainability.

The Committee is composed of the Chairman and CEO of the Group (who also chairs the Committee), the Chief Financial Officer, the Chief People & Culture Officer, the Internal Audit Executive Director, the Chief Legal Officer & General Counsel and the Corporate Governance Counsel Associate Director, who also acts as Secretary of the Committee.

### **Sustainability Committee**

Is an internal committee reporting to the company's Management Board, chaired by the Chief People & Culture Officer and its Secretary, the Global Sustainability Executive Director. In addition, it has Directors who are responsible for the different areas of the company. Its objectives are:

- The management and leadership of sustainability goals, periodic action plans, programs, relevant projects and key initiatives aligned with the sustainability strategy approved by the Board of Directors and supervised by the Audit Committee, in the main pillars of the sustainability areas, namely Planet, People, Patients, Partners and Principles.
- To act as a link between the business areas, the corporation and the company's governing bodies, proposing the Sustainability Strategy to the Board of Directors, as well as transmitting the approval of proposals and results to the rest of the company.

The mission of the Sustainability Committee encompasses the following responsibilities:

- Validate the company's sustainability strategy and program for its presentation by the CEO to the Board of Directors, and promoting them throughout the organization.

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- Analyze, promote and supervise Almirall's Sustainability Strategy, including the company's sustainability objectives, action plans and practices in the main pillars of the sustainability areas, namely Planet, People, Patients, Partners and Principles.
- Support key initiatives in all key functions of the organization and follow up to ensure they are implemented and aligned with Almirall's purpose, values and culture, whilst maintaining transparent communicating with stakeholders.
- Support internal and external sustainability communication plans.
- Oversee compliance with the increasing number of auditing and reporting requirements related to ESG and sustainability from different stakeholders (authorities, partners, voluntary schemes, ratings, etc.) and ensure alignment with other requirements to which the company subscribes.
- Provide the necessary resources to the Global Sustainability area, which is responsible for drafting, coordinating and executing the Sustainability Strategy.

### **Tax Committee**

Is responsible for (i) discussing tax matters, proposing measures, guiding and overseeing the tax policies submitted to the Committee, with a view to establishing a long-term tax strategy in line with the business structure and corporate strategy, with emphasis on the correct alignment of these tax proposals with current tax regulations, monitoring good tax practices, improving legal certainty and reasonably minimizing tax risks; and (ii) reviewing corporate transactions (acquisitions and licensing agreements) that are reviewed by the Investment Appraisal Committee.

Further details on the Group's tax policy can be found at 2.4 "Responsible taxation".

### **Investment Appraisal Committee**

It is chaired by the *Chief Financial Officer*, with the *M&A & Corporate Development Director* acting as Secretary, and comprises other Directors responsible for different areas of the company. It is responsible for assessing and supporting the Management Board concerning investments with a major impact on the company.

### **Commercial Operations Committee**

This committee is composed of the *Chief Commercial Officer*, who chairs it, the *Chief Financial Officer*, *Chief Marketing Officer* and *Chief Medical Officer* and its functions are to align cross-functional strategies, plan business activities and advise on key operational aspects of the business, as well as to monitor the performance, results and risks of operations by submitting proposals to the Management Board, facilitating discussion and decision-making.

## **2.1.4. Risk management**

Almirall's Risk Management System is based on the preparation of a Risk Map that is updated every two years under the coordination and supervision of Internal Audit. The Risk Map is drawn up based on the consolidation of the analysis and assessment of events, risks, mitigation controls and action plans, carried out by the business and support units that make up the different company areas. For risks related to taxation, there is also a Tax Committee for controlling, managing and minimizing them.

Preparation and implementation of the Risk Management System is the responsibility of the company's Senior Management, and the function of overseeing its effectiveness is carried out by the Audit Committee and by the Corporate Governance Committee, which is functionally linked to the Chairman's Office, given that it refers directly to an essential responsibility of the Board of Directors itself.

The company operates in a sector characterized by great uncertainty about the outcome of R&D expenditures and in a highly competitive market in the therapeutic areas on which it is focused. The pharmaceutical industry is an industry subject to the decisions of health authorities for both approval of products and determination of marketing conditions, as well as being a highly regulated industry in terms of the environment, pharmacovigilance, quality and codes of good practice in promotional activities.

These factors result in a nature of risks that are addressed by taking a conservative stance, being very selective in resource allocation and establishing very rigorous and effective processes and controls in operations.

All risks that could have a significant impact on the achievement of company objectives are assessed. Risk factors to which Almirall is subject include:

- Regulatory risks, arising from regulatory changes established by the various regulators, or from changes in social, environmental or tax regulations. Examples include price reductions or volume limitations for existing products and difficulties in obtaining requested prices or reimbursement

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conditions for new launches due to decisions by health authorities, with the concomitant impact on sales forecasts.

- Market risks, related to the exposure of Almirall's earnings and equity to changes in prices and other market variables, such as exchange rates, interest rates, commodity prices, financial asset prices and others.
- Credit risk, in the event that a counterparty does not comply with its contractual obligations and produces an economic or financial loss for the company.
- Business risks arising from the uncertainty as to the behavior of the variables inherent to Almirall's business, such as the characteristics of demand, the supply of raw materials and the appearance of new products. Examples include revenue erosion and loss of market share due to the progressive entry of generics, deterioration of intangible assets due to a lower-than-expected net revenue stream in some businesses or an R&D pipeline that is not sufficiently balanced and differentiated in its different phases to nourish the product portfolio.
- Operational risks, referring to direct or indirect economic losses caused by inadequate internal processes, technological failures, human error or as a consequence of certain external events. Operational risks also include legal and fraud risks and ones associated with information technology and cybersecurity (cyber-attacks or security incidents that allow access to confidential information or disrupt business activities).
- Reputational risks, which include the potential negative impact associated with changes in the perception of Almirall by its different stakeholders.
- Geopolitical or climate change risks that may affect the supply chain.

The company also takes into account sustainability risks, including environmental, social and governance (ESG) risks, and pays close attention to those associated with climate change, human resources and talent recruitment, among others:

- Environmental risks: Almirall's environmental policy aims, among other things, to minimize the environmental impact of new products and developments, ensure compliance with applicable legal requirements and other principles to which the organization subscribes, and apply pollution prevention techniques. Section 4.1, "Environmental management", describes the main actions taken in relation to the environment.
- Risks to society: With respect to potential risks with social impact, Almirall's quality system covers the entire production process, from procurement of raw materials to the release of the finished product, in order to minimize the risk of releasing a product onto the market with compromised quality, efficacy or safety. The company has a complaint control and pharmacovigilance system for rapid detection of possible problems of product quality, efficacy or safety and the adoption of corrective measures. In addition, product traceability control systems would enable a quick and effective recall of any batch of product from the market. Section 5.4.3 'Patient health and safety' discusses these aspects in greater detail. Safety standards for staff are more rigorous than are legally required and are thoroughly documented. Product liabilities and potential incidents at facilities are covered by global risk management policies and insurance programs.
- Governance risk: the Group has policies established for corporate social responsibility, communication with financial markets and compliance with good practices in tax matters.

There is a Risk Management Policy that confirms the guidelines and reference framework for Almirall's entire risk management system, as well as a Risk Control Policy.

## **2.2. Business Conduct**

At Almirall, corporate responsibility, integrity and transparency are a fundamental part of our operations. We recognize the importance of non-financial factors in creating long-term value and, as a result, we are dedicated to conducting our business in a safe and environmentally sustainable manner as part of our commitment not only to improving the lives of the people suffering from skin diseases, but also to making a positive impact on our stakeholders.

This commitment is supported by means of a compliance program that focuses on communication, training, risk assessments, due diligence, policies and procedures, staff reporting systems, case management and related investigations, supervision and continuous improvement. Through the compliance program, there is a

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commitment to comply with the standards of ethical conduct applicable to the pharmaceutical industry and the provisions of its Code of Ethics, which reflects the principles, values and behavioral guidelines to be followed.

### **2.2.1. Organizational structure of business conduct at Almirall**

The Board of Directors is Almirall's highest decision-making, supervisory and controlling body, except in those matters legally or statutorily reserved to the General Meeting of Shareholders. The Board of Directors establishes Almirall's general policies and strategies; in particular the strategic and business plan, management objectives and the annual budget, and assures compliance with the applicable laws and regulations.

The Board of Directors delegates the day-to-day management of Almirall to the Management Board and, insofar as legally possible, to the Chief Executive Officer who leads it. In this way, the Board of Directors can focus its own efforts on the supervisory function and taking the most relevant decisions.

The Board of Directors is responsible for approving the Code of Ethics, the Internal Code of Conduct in the Securities Markets and the Corporate Policies below, among others:

- Policy on the internal information system of the Almirall Group in Spain and essential principles of the communications management procedure
- Corporate Governance Policy
- Sustainability Policy
- Risk Management and Control Policy

The Corporate Governance Committee reviews all Corporate Policies and submits them for approval by the Management Board and/or the Audit Committee and Board of Directors in accordance with the applicable legislation and internal regulations. All Corporate Policies are published on the corporate intranet and/or corporate website, as appropriate, so that all workers have access to them.

The Management Board operates in accordance with the general guidelines set by the Board of Directors and/or delegated by the Board to the Chief Executive Officer. This is Almirall's corporate executive committee, which determines and oversees the attainment of the Group's long-term goals and strategies. It also establishes the principles and approves the content of internal corporate policies that are not exclusively reserved for approval by the Board of Directors.

The Audit Committee, in the area of ethics and anti-corruption, is responsible for overseeing compliance with the company's corporate governance rules and internal codes of conduct, ensuring that the corporate culture is aligned with its purpose and values. The Audit Committee reviews and recommends approval of the financial and non-financial information that the company regularly publishes, ensuring compliance with all the legal requirements and the correct application of the relevant accounting standards. It also supervises the internal audit system, internal control systems and activities related to risk control and management. The Audit Committee also assumes the functions related to the supervision of all issues related to sustainability and ESG, ethics and compliance, information security and cybersecurity.

The Governance Committee, as defined in section 2.1.2 "Board Committees", supports and supervises the implementation and updating of the various risk management systems, among other functions.

The General Counsel area includes the Legal, Compliance, Privacy, Corporate Governance and Information Security areas. The main function of these areas is to protect the company's tangible and intangible assets, minimizing the risks assumed by the company, which always operates in line with the applicable legislation, Almirall's governance model and the adopted corporate policies.

The General Manager of each subsidiary acts as a multidisciplinary risk manager for all of the subsidiary's areas of activity, and is supported by the Compliance Officer appointed in each subsidiary and by the Legal area.

### **2.2.2. Impact, risk and opportunity management**

At Almirall, governance is based on a firm commitment to transparency, integrity and regulatory compliance. Through specialized committees and commissions, such as the Audit Committee and the Sustainability Committee, which report to the Board of Directors and the Management Board respectively, the company follows best governance practices and seeks to lead in transparency in order to gain the trust of all third parties with whom it interacts. This integrated approach fosters a culture of corporate responsibility and sustainability, gearing operations towards long-term value creation.

In terms of managing governance impacts, risks and opportunities, the 2024 Double Materiality analysis identified the most relevant factors, integrating them into a corporate process led by the Executive Director of Internal Audit, with each business area responsible for managing its own risks.

### Risks

- **Cybersecurity:** Disruptions in Almirall's business operations due to cyber-attacks that generate a significant disruption and/or leakage of secret information, especially in highly automated and digitized production and research and development processes. This could result in considerable financial losses and the erosion of customer and staff confidence.
- **Corruption and bribery:** Loss of reputation and increased risk of legal sanctions due to potential corruption and bribery practices within Almirall.
- **Artificial Intelligence (AI):** Increased ethical concerns due to the use of artificial intelligence tools and systems in Almirall's research and development activities. This could lead to biases in AI programming and learning.

### Opportunities

- **Corporate culture:** Almirall's corporate culture is characterized by a focus on transparency and the improvement of Health, Safety and Environment (HSE) standards through the digitization and automation of R&D and production processes. This contributes towards the development of safer and more effective medicinal products, in line with the company's purpose. Furthermore, the integration of sustainability principles in all of our activities strengthens the company's reputation.
- **Whistleblower protection:** Increasing transparency, accountability and a culture of integrity within Almirall by implementing robust mechanisms such as the "*SpeakUp!*" whistleblowing channel to protect whistleblowers who report misconduct or unethical behavior. This also reinforces ethical and legal compliance in general.
- **Animal welfare:** Improving Almirall's reputation and building public trust by implementing ethical standards and practices that ensure the welfare of animals, especially those involved in R&D activities. These measures not only align with industry regulations, but also resonate with consumers' ethical and responsible values, which could translate into greater support and loyalty from a socially conscious customer base.
- **Corruption and bribery:** Strengthening ethical standards and corporate reputation by implementing rigorous anti-corruption and anti-bribery measures. By establishing comprehensive policies and training programs that ensure transparency and integrity, Almirall can position itself as a leader in ethical business practices, building stakeholder trust.

### Negative Impacts

- **Whistleblower protection:** The lack of adequate whistleblower protection within Almirall may deter staff from reporting inappropriate or illegal conduct. If staff fear reprisals, such as dismissal, discrimination or harassment, they might not report incidents, allowing many to go unnoticed or unaddressed.

### Positive Impacts

- **Corporate culture:** Strengthening corporate culture by promoting transparent and participatory communication, value-based recognition, integration and talent development programs, and programs to foster work-life balance.
- **Whistleblower protection:** Increased organizational integrity and transparency at Almirall through the implementation of robust whistleblower protection policies, which fosters a safe and ethical work environment, positively impacting society by promoting values of honesty, integrity and ethics in the business world.
- **Corruption and bribery:** Almirall reinforces business integrity and ethics through corruption prevention and detection programs, together with the continuous training of its staff and a confidential whistleblowing system accessible to its workers and third parties. In this way it promotes a transparent business environment and contributes to the fight against corruption.

#### 2.2.3. Business conduct policies

The different policies and standard operating procedures in place at Almirall reflect the company's firm commitment to carrying out its activities in accordance with the legislation in force in each of the countries in which it operates, and always guaranteeing integrity in each of its activities and operations, in compliance with the United Nations Universal Declaration of Human Rights, the International Labor Organization (ILO) Conventions, the ILO Declaration on Fundamental Principles and Rights at Work, the OECD Guidelines for Multinational Enterprises and the principles of the United Nations Global Compact, among others.

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Almirall's Business Integrity Guide (ABIG) describes the principles that govern the company's interactions with its key stakeholders, based on legitimate objectives and business needs. The stakeholders with whom Almirall interacts vary according to the context and nature of the activity, which may cover different stages of the product life cycle, from development to marketing. These groups include, among others, healthcare professionals, health organizations, patient associations, patients, payers, regulatory agencies and legislators. This guide covers five topics: general company information, promotional activities, non-promotional activities, interactions with external experts and general issues.

The Personal Data Protection Policy provides the guidelines and principles to be followed for protecting the personal data of Almirall's stakeholders, within the scope of the activities carried out by Almirall's different departments and functional areas. All of this with the aim of ensuring compliance with applicable data protection laws, in particular the GDPR or General Data Protection Regulation. This section describes the most relevant policies, starting with the Code of Ethics, which establishes a reference framework for all of them.

### **Code of Ethics**

Almirall's Code of Ethics reflects the principles, values and behavioral guidelines that govern the actions of everyone who works in Almirall and that form the basis of all our Corporate Policies.

In the Code of Ethics:

- Company values are established
- The corporate governance and compliance system is described
- The people management model is determined (diversity, health, safety)
- Guidelines on asset protection, integrity and research and development, protection of stakeholders (patients, consumers, health professionals, public officials, suppliers and others) are specified
- It describes the service that the company provides to the community and our commitment to the environment.

More details on the Code of Ethics can be found at 5.2.2 "Policies related to own workforce".

### **Risk Control Policy and Risk Management Policy**

Almirall operates in a sector with high uncertainty in the results of R&D investment, within a competitive market and subject to decisions by the Health Authorities for the approval and marketing of products. We take a conservative approach to managing these risks, selectively allocating resources and setting up strict processes and controls in our operations.

The Risk Management System (described in section 2.1.4 "Risk management") is a comprehensive risk management model, under the responsibility of the Executive Director of Internal Audit, aimed at preventing and managing Almirall's business risks, which have a triple purpose: (i) prevent potential risks that may incur legal liability for the company and its directors, attorneys-in-fact and/or legal representatives, (ii) anticipate the management of such risks, and (iii) verify compliance with the relevant regulatory framework applicable to the company, both internally and externally.

These policies were approved in 2020 and the corresponding action plans and annual risk map, which facilitate the monitoring, control and update by the internal audit function, derive from it.

There is also the Criminal Risk Prevention and Management Model, approved by the Board of Directors on 27 July 2015 and extended by an addendum on 31 October 2021. It determines the system for the organization, prevention, management and control of criminal risks of Almirall and its subsidiaries. This model develops a plan for prevention of the commission of crimes by the company, and compiles the procedures and controls that currently exist for effective prevention and mitigation of criminal risks, based on a detailed analysis of those that could hypothetically arise in the Group's different areas, taking into account, on the one hand, the policies and controls already in place, and on the other, the sensitivity to criminal risks detected in the specific processes, depending on the sector and the activities that Almirall engages in.

The Corporate Governance Policy, updated in July 2024, which aims to establish the governance principles and structures that govern Almirall, S.A. and its group entities, guarantees a management model aligned with the corporate purpose and values. This policy is applicable to all Almirall Group entities, subject to local laws in each jurisdiction where it operates. Its content was approved by the Board of Directors, who also endorses compliance with the same, and it is applied broadly without prejudice to the legal and regulatory requirements applicable in the relevant jurisdiction where each subsidiary is incorporated and conducts its business operations. The governance model described in this Policy is based on the recommendations set out in the Good Governance Code of Listed Companies revised and published in June 2020 by the CNMV, the Articles of



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Association of Almirall S.A. (as Parent Company of the Group) and the Code of Ethics described above. It is implemented in accordance with the principles derived from Almirall's Purpose and corporate values and aims to ensure a management model is in place that defends the long-term interests of Almirall's different stakeholders and guarantees the Group's long-term viability and sustainability. All Almirall staff must report any possible infringement of the policy, either directly to their manager, to the People & Culture area, to the Compliance Officer, or via the *SpeakUp!* channel, promoting a culture of transparency and ethical compliance.

### **Supplier Code of Conduct**

This code, in its most recent 2024 version, sets out the expectations that Almirall has of its suppliers in the areas of ethics, human and labor rights, health and safety, the environment and management systems. Suppliers must accept these sustainability standards during the approval process and commit to comply with the same (and to ensure that their subcontractors do so also). See further details in section 2.3.1 "Supply chain management approach" of this report.

This document expresses, among other aspects, Almirall's zero tolerance stance towards the attitude, behavior or practice of corruption, bribery or influence peddling in relation to public officials or institutions, whether national or international, or in any other circumstance.

In addition, in the design of preclinical trials and in the relations with the Contract Research Organizations (CROs) to whom these trials are outsourced, Almirall requires a meticulous respect for the legislation in force in the field of animal research. The welfare of laboratory animals is a priority, as there is a moral responsibility towards the animals used for research, taking into account the principles of Replacement (use of technologies that avoid the use of animals), Reduction (minimizing the use of animals) and Refinement (use of methods that minimize the pain of animals and improve their welfare).

### **Sustainability Policy**

This policy has been updated in 2024 and is important for the company in the area of governance, as subsequently mentioned in chapters 3 "Sustainability Management and Double Materiality", 4 "Environment" and 5 "Social". This Policy defines the roles and responsibilities for sustainability governance and the various implications of these for the Board of Directors, Audit Committee and Management Board, as well as for the Chief Executive Officer, the Sustainability Committee, the Global Sustainability Executive Director, the Area Directors and the General Managers of subsidiaries.

This policy sets measurable sustainability goals that are aligned with the United Nations Sustainable Development Goals (SDGs) for 2030 and the Climate Goals of the Paris Agreement. These goals are monitored by means of indicators (KPIs) and are set out in detail in the sustainability report or non-financial information statement, in the annual report and on the company's website.

The sustainability goals will be linked to the variable remuneration of key internal stakeholders, including the members of the Management Board, Senior Leadership and those with direct responsibilities in sustainability, both in the short and long term.

This policy responds directly to the corporate culture identified as material in the double materiality analysis carried out.

### **Anti-Bribery and Anti-Corruption Policy (ABAC)**

Bribery and corruption are related to offering, giving, promising to give, receiving or accepting, actively or passively, anything of value or in exchange for an advantage, in order to induce or influence an action or decision for commercial, contractual, regulatory or personal gain.

Bribery, corruption and other similar types of conduct, whether between private individuals or with public and private officials or organizations, are prohibited at Almirall. Illegal and criminal practices of all kinds are also prohibited without exception and without limits. Political contributions and donations are completely prohibited. Almirall does not tolerate any attitude, behavior or practice of corruption, bribery or influence peddling in relation to public officials or public institutions, whether national or international. Nor does it tolerate misleading, fraudulent or malicious conduct that could lead the company to obtain undue or unfair advantages. Therefore, any practice that distorts, restricts or aims to eliminate competition, such as comparative, false or misleading advertising, as well as the denigration of Almirall's competitors, must be avoided. Almirall prohibits and utterly rejects any practice or conduct that involves incitement to prescribe its medicines in breach of regulations, in disparagement of the competition, or by means of false or misleading advertising.

Updated in 2024, the Anti-Bribery and Anti-Corruption Policy outlines the key principles of ABAC, supported by additional procedures and guidelines that describe how Almirall detects, prevents and mitigates bribery and

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corruption risks in its business activities, in response to the impacts, risks and opportunities identified in the double materiality analysis and related to corruption, bribery and corporate culture.

Almirall is also a member of EFPIA (European Federation of Pharmaceutical Industries and Associations) and IFPMA (International Federation of Pharmaceutical Manufacturers and Associations). We are therefore obliged and committed to comply with the requirements set out in EFPIA's "Code on the Promotion of Prescription-Only Medicines to, and Interactions with Healthcare Professionals", as well as local regulations. In addition, all Almirall workers, and especially those with specific control or supervisory functions, are responsible for the prevention, detection and reporting of bribery and other forms of corruption. For this reason, Almirall has established the control mechanisms necessary to prevent, detect and report such practices. All Almirall personnel are obliged to notify the relevant manager of any known or suspected situation or any suspicion that any situation of potential bribery and/or corruption has occurred or is about to occur, which could lead to or imply a breach of this Policy.

### **Channels of communication of Corporate Policies**

The Corporate Policy Guidance states that each corporate policy and SOP (Standard Operating Procedure) must have an owner, who will be a Director or the most senior person in the area covered by the policy and will be responsible for the lifecycle management of that corporate policy or SOP.

Such life cycle management involves the following:

- Identify the need for any corporate policy and propose that it be incorporated.
- Identify and draft the related SOPs.
- Identify the target audience for the Policy or SOP and its communication.
- Prepare and implement a training plan.
- Review and update the Corporate Policy or SOP as necessary.
- Identify a new owner of the Corporate Policy or SOP where necessary.
- Ensure that the Policy or SOP is available in Spanish and in the different local languages.

Corporate policies and other internal regulations on business conduct are published on the corporate intranet and/or on Almirall's corporate website, as appropriate, so that all Almirall employees have access to them. The Director responsible for each Policy is also responsible for its due internal communication and training on the reading and understanding thereof from the corporate platform.

### ***Statement on the Use of Animals for Scientific Purposes at Almirall***

Animal research is a small but essential aspect of the development of many products. When using animals in research, at Almirall we are firmly committed to our Statement on the Use of Animals for Scientific Purposes, adopted in 2018.

At Almirall, animal research is recognized as having great benefits for both human and animal health. We accept that it is impossible to completely avoid the use of animals in new drug research at the current time, and we understand that this is a matter of great concern to society.

The welfare of the laboratory animals housed in the facilities is an absolute priority for Almirall. Not only do we have a moral responsibility towards them, but we also believe that this translates into a higher quality science.

A key aspect of animal welfare is covered by the so-called three Rs (3Rs), which refer to:

- Replace animal research with other methods where possible (in silico or in vitro techniques).
- Reduce the number of animals used in studies (provided that this minimum number provides sufficient and relevant conclusions).
- Refine techniques to minimize pain and distress and improve the animals' welfare.

All procedures or projects involving animals are carefully evaluated by an internal Ethics Committee. This committee is a regulated body that oversees ethical compliance and adherence to the law. It comprises the Animal Welfare Specialist, who is responsible for the on-site supervision of the welfare and care of the animals in the facilities, and expert scientific members. The Ethics Committee also receives advice from the designated veterinarian, a specialist in laboratory animal medicine, who is responsible for advising on the health status and treatment of the animals, including a program of environmental enrichment and socialization for the animals.

The main functions of the Ethics Committee include the following:

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- Advise staff on animal welfare, especially with regards to the acquisition, housing, care and use of animals.
- Promote the principles of replacement, reduction and refinement of methods, and review technical and scientific developments in these areas.
- Oversee internal monitoring and animal welfare processes, as well as provide recommendations on animal relocation plans.

All procedures or projects, once evaluated by the Ethics Committee, must be approved by the competent authority (the Generalitat de Catalunya, in the case of the Sant Feliu center) before a single animal experiment can be performed.

There are protocols that cover the standards of care and ethical treatment of animals in research. These protocols define and drive the standards for working with animals and all research must comply with them.

All personnel involved in animal studies receive training in standards of care and ethics regarding the use of animals in research, which must be periodically re-accredited.

All facilities and programs comply with regional, national and European laws, guidelines and codes of conduct, and are regularly inspected by the competent authority.

### **Data Protection Policy and Privacy Program**

Almirall's Data Protection Policy, updated in 2024, sets out the rules and principles for protecting the Personal Data of Almirall's stakeholders, within the framework of the activities of its various departments, in order to ensure compliance with the applicable laws on Personal Data protection. This policy applies to Almirall S.A. and to the legal entities of the Almirall Group and is binding on all staff. In addition, third parties processing personal data on behalf of Almirall must also comply with this policy. The Global Data Protection Officer (GDPO) is primarily responsible for ensuring compliance.

The Data Protection Policy also includes the Privacy Program, which aims to protect the personal data of our customers, patients and other stakeholders with whom Almirall interacts (hereinafter, "data subjects"), always in accordance with the legislation applicable in the jurisdictions in which Almirall operates. The Almirall Privacy Program develops the commitments adopted through the Almirall Code of Ethics, with the purpose of maintaining and establishing a program that deepens and develops Almirall's commitment to the right to privacy of the stakeholders who interact with the company.

Almirall processes personal data in accordance with the principles of lawfulness, loyalty and transparency, purpose limitation, data minimization, accuracy, storage limitation and, finally, the principle of integrity and confidentiality. In this regard, Almirall's Privacy Program contains procedures and tools that can be used to document and demonstrate compliance with the above principles, which are arranged according to the following pillars:

- Governance, consisting of the adoption of a Global Corporate Data Protection Policy and various Operating Procedures and Protocols that, in practice, develop regulatory compliance in this area.
- Almirall Privacy Network, comprising a Global Data Protection Officer (GDPO), the Almirall Privacy Office - integrated with Almirall's Information Security function - and the local privacy network in each of Almirall's subsidiaries. All of them are responsible for implementing, supervising and monitoring the correct deployment of the Privacy Program at Almirall.
- Inventory of personal data processing, which reflects the data processing flows carried out at Almirall.
- Privacy by design, with the carrying out of the assessments that are necessary and relevant to each company project, with a focus on analysis and the adoption of technical, contractual and organizational measures in each case aimed at privacy by default.
- Information to data subjects, in relation to personal data collection processes, the company implements transparent mechanisms to obtain consent in the collection and processing of data from data subjects, where appropriate.
- Relations with suppliers or third parties involved by Almirall in the processing of personal data, whether they are processors, joint controllers or independent controllers, adopting the necessary contractual measures and safeguards to ensure that the processing of data is in accordance with the applicable legislation, including the management of international transfers of personal data.

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- Management of data subjects' rights, through mechanisms that ensure that requests made by data subjects are responded to in a timely manner in accordance with the provisions of the applicable legislation.
- Management of personal data security breaches, through a response service equipped with the means to manage and respond to any personal data security breaches that may occur.
- Internal staff awareness programs, focusing on staff awareness at all levels.
- Monitoring and auditing of the correct functioning of the Privacy Program

Almirall's Data Protection Policy and Privacy Program satisfies the privacy and personal data processing needs of the data subjects, and is identified as a key area by the company in its business processes. The policy is available to all Almirall staff on the corporate intranet.

#### **2.2.4.Prevention and detection of corruption or bribery**

Bribery and corruption are understood to be all activities related to offering, giving, promising to give, receiving or accepting, actively or passively, anything of value or in exchange for an advantage, in order to induce or influence an action or decision for commercial, contractual, regulatory or personal gain.

In pursuing its activities, Almirall is governed by a strong sense of corporate responsibility, integrity and transparency, as well as by strict and faithful compliance with current legislation.

Information related to anti-bribery, anti-corruption and Code of Ethics training can be found in the chapter 5.2.13 "Talent development and training" of this report.

In addition, each year Almirall publishes all value transfers made to healthcare professionals, healthcare organizations and patient associations, in accordance with the EFPIA Code and applicable legislation. This information is available on the Group's corporate website.

#### **Identification of corruption and bribery risk functions**

The functions identified by Almirall as those at risk of corruption and bribery are as follows, which are covered by related training programs:

- *Chief Commercial Operations Europe & International*
- *Chief Financial Officer*
- *Chief Industrial Operations*
- *Chief Legal Officer & General Counsel*
- *Chief Medical Officer*
- *Chief People & Culture Officer*
- *VP Corporate Development & Strategy*
- *Sr Dr Investor Operations*
- *Chairman & Chief Executive Officer*

#### **Training**

Training in the Code of Ethics, Privacy and ABAC (Anti-Bribery and Corruption Policy) is compulsory for all workers when they join the company and is valid for two years, to be repeated after this period.

Local training is also provided, based on the Promotional Compliance Policy, to all sales representatives on the guidelines for permissible and impermissible behavior and actions in the performance of their duties (welcome pack and regular training).

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The total number of workers who have received training on the company's Code of Ethics, as well as on anti-bribery, anti-corruption and privacy, in 2024, is shown below:

	Code of Ethics	Anti-bribery / Anti-corruption	Privacy
<b>Training coverage</b>	<b>98%</b>	<b>91%</b>	<b>90%</b>
Total employees receiving training	1,977	1,840	1,825
Total employees	2,026	2,026	2,026
<b>Methodology</b>			
Face-to-face	146	0	0
Online	1,831	1,840	1,825
<b>Frequency</b>	Every two years	Every two years	Every two years
<b>Main content of the training</b>			
Definition of bribery and corruption	X	X	N/A
Group Policies	X	X	N/A
Detection process	X	X	N/A
Speak-Up! channel operation	X	X	N/A

Table 1 Code of Ethics and ABAC training

### Investigation and management of corruption and bribery cases

All Almirall workers, and especially those with specific control or supervisory functions, are deemed responsible for the prevention, detection and reporting of bribery and other forms of corruption. For this reason, Almirall has the control mechanisms necessary to prevent, detect and report this type of practice in place. All Almirall workers are asked to notify the relevant manager of any known or suspected situation of bribery and/or corruption that may lead to or imply a breach of the Bribery and Corruption Policy. Almirall will always protect company personnel against any repercussions in the event that they reject or report any possible acts of bribery or corruption. Almirall has procedures in place and provides training to ensure that all employees and third parties with whom it interacts are aware of the Anti-Bribery and Anti-Corruption Policy. Any breach of this Policy and/or of the above responsibilities will result in internal disciplinary action(s), possible dismissal for gross misconduct and the application of appropriate legal liability.

During the case review process, only those individuals necessary to conduct a thorough investigation are involved. In the event that the People & Culture and Global Compliance & Privacy teams deem that an independent investigation cannot be conducted, the company will engage an independent third party to evaluate and close open cases.

Periodically, high-level summaries of recorded cases are submitted anonymously to the Corporate Governance Committee. Important cases, especially those involving bribery or corruption, are also shared with the Audit Committee. Corrective and preventive actions are taken as a result of the study of complaints received through SpeakUp! Cases are reported at least once a year to the *General Counsel* and to the Corporate Governance Committee.

In 2024, out of a total of 19 reported cases; 8 were substantiated, 6 were unsubstantiated, and 5 case are under investigation at the date of publication of this report.

None of the cases were related to bribery and corruption, human rights violations, forced or compulsory labor or child labor.

### Whistleblower channel (SpeakUp!)

*SpeakUp!* is the company's secure and confidential whistleblowing channel, for all employees and external partners to report any concerns. It provides a safe and confidential means to report any situations of bribery, corruption, fraud, abuse and other conducts, such as human rights violations, that are not in line with the Code of Ethics.

More details on how to use the *SpeakUp!* channel can be found in the chapter 5.2.4 "Processes to remediate negative impacts and channels for own workers to raise concerns".

### 2.2.5.Cybersecurity and Information Security Management

With regard to information security management, Almirall has and maintains an Information Security Program aimed at protecting strategic information and critical business processes, aligned with market standards such as the NIST Cybersecurity Framework and the NIST 800-53 series.

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The Information Security function in the organization covers an area from strategy to operations, and has the necessary organizational independence, empowerment and sponsorship. Supervision of risk management is integrated into the Corporate Governance mechanisms, with regular reports to the Management Board and, at least twice a year, to the Audit Committee of the Board of Directors. This supervision is based on monitoring the maturity of Information Security processes and a selected set of key risk indicators. This regular review also guides the annual update of the Information Security Program.

Almirall's approach to the Information Security Program is holistic and risk-oriented, covering the triad of Processes, Technology and People, and all NIST CSF Functions: Identify, Protect, Detect, Respond and Recover, with special emphasis on becoming a cyber-resilient organization.

Almirall also constantly focuses on staff awareness at all levels, with specific plans that are redesigned every year to ensure a high impact, as well as increasing levels of training among staff and a strong first line of defense. The other projects and initiatives aim to achieve and maintain the desired levels of maturity and to keep risks at acceptable levels, in line with the company's risk profile. A cybersecurity insurance policy is in place as a strategy for last line of defense.

At Almirall, our Information Security Program is integrated with Data Privacy, is guided by the principles of security by design and security by default, and covers third-party risk management with a risk-oriented approach.

### **Corporate Information Security Policy**

The purpose of this Policy, updated in 2023 by the Management Board, is to establish the basic guidelines and principles relating to the mission, scope and objectives of the Information Security (IS) function at Almirall. This policy is available to all staff on the company's intranet and its objectives are to:

- Define Almirall's principles and governance structure in order to ensure the protection of the key Information Security aspects: confidentiality, integrity and availability.
- Define guidelines for Information Security risk management.
- Define the internal regulatory system for the control and management of Information Security.

This corporate policy applies to the entire Almirall organization, including all relevant areas, processes and systems related to Information Security risks, as well as Business Continuity in this context. People, processes and technologies (both IT and OT) are within the scope of Information Security.

The most relevant principles of this policy are as follows:

- Integral Responsibility: The whole organization is responsible for information security at all levels.
- Strategic Alignment: The security strategy should be aligned with the business objectives through constant communication with senior management.
- Risk-Based Approach: Implement security measures based on the risk assessment throughout the information and systems lifecycle.
- In turn, the ISMS (Information Security Management System) acts as a global framework to ensure the application of good security practices at Almirall. This system is defined in the Standard Operating Procedure (SOP) on Information Security.

Regarding risk management, a defined, repeatable and effective risk management methodology is established, aligned with standards and consistent with the Enterprise Risk Management guidelines drawn up by Internal Audit. In addition, Information Security incidents shall be managed in accordance with the Security Incident Management Protocol and its technical procedures. The participation of the Management Board is key in high-severity incidents.

### **2.2.6. Artificial Intelligence Management**

In response to the rapid emergence of Artificial Intelligence, Almirall is building an Artificial Intelligence Management and Governance Program to ensure that the use of these technologies is in accordance with the ethical principles of IFPMA (International Federation of Pharmaceutical Manufacturers and Associations), which Almirall has adopted as its own: (i) empowerment of people, (ii) equity and minimization of bias, (iii) privacy, security and safe design, (iv) accountability, (v) human control, and (vi) transparency, explainability and ethical use. Almirall has adopted an Internal Guide for the Use of Artificial Intelligence which includes the aforementioned principles and is applicable to all the company's employees. Almirall also carries out internal training actions to demonstrate the practical application of these principles and other actions aimed at specific areas especially interested in the use of these technologies.

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In addition to the above actions, Almirall has set up an Artificial Intelligence Working Group made up of different areas and departments of the company with the aim of establishing Artificial Intelligence Governance, focused on risk management, development of guidelines and protocols, establishment of internal processes aimed at demand management, and the responsible management of Artificial Intelligence. The Artificial Intelligence Working Group is currently immersed in the design of processes that ensure the correct use of this technology from an ethical point of view and in compliance with the applicable legislation on this matter.

## 2.3. Sustainable supply chain

### 2.3.1. Supply chain management approach

Respect for the law, the commitments assumed, the quality of service and contractual good faith form the basis of the relationship between Almirall and its suppliers. We demand quality, rigor, commitment and excellence from all of them, given that our suppliers are an extension of Almirall's activities and, therefore, one of our most important assets. Suppliers are required to be reciprocal and transparent in the provision of services and in the information they provide to us regarding their technical and financial solvency.

To ensure that the product supply chain is stable and sustainable, Almirall has supplier approval processes which, depending on the service provided or goods supplied and the geographic area from which they operate, ensure that they comply with the requirements established by Almirall and the regulatory framework in terms of quality, the environment (ISO certification, ecological criteria), occupational health and safety, and labor practices.

In recent financial years, Almirall has been working to increase and strengthen these processes. Specifically, the Global Procurement department leads the Sustainable Procurement Program, which is framed within Almirall's Sustainability strategy. This procurement program is designed to align with the company's 2030 strategy, in particular within two of the key pillars of the Act4Impact strategy: Planet and Partners, mentioned in section 3.1.3 "Sustainability Strategy". This new strategy of the sustainable procurement program was developed in 2023 and is currently being implemented.

#### **High-Risk Materials Project**

As a member of the Pharmaceutical Supply Chain Initiative (PSCI), Almirall has launched a project called "High-Risk Materials" to implement the PSCI recommendations included in the Environmental and Human Rights Impact Assessment Specific to Materials developed in 2020. The aim of this Environmental and Human Rights Impact Assessment is to identify the potential impacts of a set of materials agreed by PSCI's Human Rights, Labor and Environment Sub-Teams because of their importance to the pharmaceutical industry: rubber, corn, palm oil, aluminum, shellac, glass, sugar, talc, fish oil, castor oil/seed, soya, cellulose, ethanol and carnauba wax.

The assessment analyzed the impact on human rights and the environment in 11 key areas: land use change, overexploitation of species, intensive farming practices, water scarcity, industrial pollution, climate change, labor rights, gender rights, child labor, forced labor and land rights.

The entire supply chain was looked at in terms of impact, from mining/harvesting to refining and processing, all of which are necessary to deliver the finished raw material to the pharmaceutical sector.

At the close of this report, the following actions had been carried out:

- **Geographies most at risk:** Several regions were identified as being at high risk in terms of human rights, including increased risk of child labor or forced labor, and environment. These include areas in Asia, Latin America and Europe (Ukraine) where the extraction and processing of materials such as palm oil and aluminum present major challenges due to intensive farming practices, water scarcity and labor rights.
- **Materials purchased:** Of the 14 materials assessed, Almirall has specifically procured palm oil, corn, aluminum, talc, sugar, soy, ethanol, cellulose and carnauba wax. These materials are essential for pharmaceutical production and have been selected for their relevance and associated risk.
- **Development of the mapping and Due Diligence process:** A comprehensive supply chain mapping has now been done for each of the above-mentioned materials. This process has included identifying key suppliers, searching for information and public certifications, as well as assessing their practices in terms of human rights and the environment. At the close of this report, a more detailed Due Diligence process is being worked on, in addition to the audits mentioned in section 2.3.3 "Levers and tools for sustainable supply chain management", which already measure and assess the value chain of the main suppliers in terms of human rights and environment.

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This improvement plan envisages the possibility of conducting physical audits of key suppliers to obtain as much information as possible and mitigate any associated risks. These audits are designed to ensure that suppliers comply with the established standards and identify areas for improvement. In addition, plans have been made to contact manufacturers directly to verify that they hold the certifications recommended by the PSCI, thus ensuring compliance with certain standards. In the absence of such certifications, individualized action plans will be implemented.

Although the project is ongoing, Almirall is committed to finalizing all stages of the Due Diligence process to assure the sustainability and accountability of the supply chain, with the aim of moving forward with it in 2025 so it can be completed before the implementation of the Corporate Sustainability Due Diligence Directive (CSDDDD). As a result of the aforementioned report, there may be disproportionate impacts on certain groups or collectives in terms of human rights and health and safety at work at the sectoral level, limited to the areas analyzed and in very specific geographies. At the close of this report, Almirall has not identified any workers with particular characteristics, or who work in specific contexts or perform activities that may be at greater risk of suffering harm. Nor has it identified specific groups of workers in the value chain that could be disproportionately affected by the risks and opportunities identified in the following section.

For more information on how Almirall ensures a sustainable supply chain in terms of labor conditions and human rights, please see section 5.3 "Workers in the value chain". For specific details on sustainable procurement from an environmental perspective, see section 4.3.7 "Scope 1, 2 and 3 emissions".

### **2.3.2. Sustainable supply chain policies and processes**

Almirall is committed to integrating sustainability principles at every stage of the supply chain, not only by adopting responsible management practices, but also by promoting ethical standards and conduct, implementing sustainable procurement policies and establishing clear clauses in contracts with suppliers. In this way, we seek to ensure respect for the environment and human rights throughout our supply chain.

In the procurement and bidding processes, there are questions related to corporate social responsibility and sustainability actions that suppliers must answer and that are evaluated by the procurement technicians when analyzing the suitability of a supplier with a weight of between 5-10%. In certain cases, based on expenditure criteria in the project being tendered, the supplier's commitment to carry out a sustainability assessment after the award of the contract is required.

As regards assessments in sustainability issues, since 2023 there has been a new protocol available relating to the audits mentioned in section 5.3.3 "Procedures, actions and resources in relation to workers in the value chain" that sets out in writing the criteria for inclusion in the program, the roles and responsibilities of the Almirall teams involved, the criteria that determine the implementation of corrective actions with suppliers and other considerations. This policy is available on the intranet for all Almirall personnel involved in procurement management.

#### **Code of Ethics**

Almirall collaborates with a wide range of suppliers, vendors and other valued partners to achieve its business goals and bring innovative medicines to patients. In choosing these relationships, we select suppliers that not only share a commitment to quality and efficiency, but are also aligned with the company's ethical values, transparency and sustainability. The company's Chairman and CEO is responsible for implementing this selection.

To achieve this, in the procurement of goods and services, we follow procedures that are adequate and fair, as are the payment terms we offer. In this way, Almirall strives to choose collaborative relationships with its suppliers in a way that is ethical and sustainable. All these actions are reflected and mentioned in the company's Code of Ethics, updated in 2024.

Similarly, this code seeks to cover those issues directly related to risks, opportunities and impacts described at the beginning of the chapter that relate to working conditions, social dialogue, health and safety and diversity, equality and inclusion for workers in the value chain.

#### **Supplier Code of Conduct**

Almirall expects all suppliers in its value chain to comply with the ethical standards set out in this code, this being a central element in the evaluation and selection of workers.

Knowledge and acceptance of Almirall's Supplier Code of Conduct during the bidding and approval process is an important element in the evaluation and selection of a supplier, along with other criteria, to ensure that they are aligned with Almirall's ethical, social and environmental commitments. During the approval process, the



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supplier must accept and commit to compliance with it (and commit to requiring its subcontractors to do the same). The area responsible for ensuring compliance with the code is the Global Procurement department.

There are a number of key themes that were developed in this code, both in its first version in September 2019 and in the latest update in 2024, regarding ethical conduct and respect for human rights and workers' rights throughout Almirall's value chain, aligned with the new PSCI principles:

- **Privacy:** Almirall treats the personal data of its stakeholders with the utmost respect for their privacy and in accordance with the applicable laws on personal data protection. Whenever suppliers provide services to Almirall that involve personal data processing activities, Almirall expects them to comply with the applicable laws. They are required to obtain informed consent where necessary and especially when processing the personal data of patients.
- **Child labor:** Almirall explicitly states that its suppliers must adhere to the prohibition on child labor according to the ILO Minimum Age Convention.
- **Abuse and ill-treatment:** The supplier is expected to ensure equality by providing a workplace free from any form of discrimination, threat, intimidation, harassment, or psychological, physical, sexual or verbal abuse or harassment. In turn, suppliers' staff must be able to report concerns or illegal activities in the workplace.
- **Working hours, wages and benefits:** Suppliers must remunerate their staff in accordance with the applicable wage legislation and agreed employment contracts.
- **Freedom of association and collective bargaining:** Suppliers must respect the rights of the workforce, as set out in local laws, to associate freely, to bargain collectively, to join or not to join trade unions, to seek representation and to join workers' councils, as appropriate, and to bargain collectively.
- **Minimum standards of protection for workers:** Suppliers must protect workers from unhealthy exposure to chemical, biological, psychological and physical hazards in the workplace. Adequate equipment, facilities and services shall be provided to support the safety, health and welfare of workers.
- **Sustainability and the environment:** Suppliers must comply with current environmental legislation at all times and use their resources in a reasonable manner, implementing control mechanisms to minimize any pollution arising from their activities. This covers waste management, emissions, spills, releases and their impact on climate change and nature. Suppliers must also have risk and quality management systems in place to ensure compliance and the ongoing monitoring of issues related to environmental care, natural resource management, waste and emissions management, and leak and spill prevention. Suppliers are expected to progressively measure their Greenhouse Gas (GHG) emissions and commit to reducing them, so as to understand their environmental impact holistically, working to reduce and mitigate their current and potential footprint.
- **Animal welfare:** The welfare of laboratory animals is a priority for Almirall. The company assumes a moral responsibility for the animals we use for research when designing preclinical trials and in our relationships with the CROs (Contract Research Organizations), who are contracted to conduct these trials. In this way, Almirall demands meticulous respect for current legislation in the field of animal research. Suppliers are expected to comply with the three principles for the humane treatment of animals: Replacement, Reduction and Refinement.

### **Procurement Policy**

In the same vein, Almirall provides a set of basic principles to follow in relation to procurement.

This policy sets out the rules for structuring Almirall's procurement processes and strategies to ensure that the services and goods we procure are the result of transparent, objective, sustainable, risk-informed, timely and cost-effective decision-making and to monitor the risk and performance of our suppliers throughout the business relationship.

This policy applies to all Almirall Group companies and their respective workforces involved in the activity in question. Any third party contracted by Almirall to carry out any of the activities described in this policy must comply with this policy to the extent that it is applicable to them.

All parties involved in the procurement process must adhere to high ethical standards. This includes avoiding conflicts of interest, respecting confidentiality and rejecting any form of corruption. Almirall only does business with suppliers that respect and comply with all applicable laws.

The Global Procurement Policy has been updated in 2024 to ensure the correct selection of Almirall's suppliers, taking into account best practices and the processes of both corporate social responsibility and environmental

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care. In turn, this policy responds to those issues identified as risks within the Health and Safety Double Materiality analysis. The implementation of the policy is the responsibility of the Global Procurement area, and the Executive Director for Global Procurement is the policy owner.

### **Contracts with suppliers**

Currently, all the standard contract models delegated to the procurement team from the legal department contain clauses relating to suppliers' compliance with the social, ethical and environmental commitments set out in Almirall's Supplier Code of Conduct and acceptance, where applicable, of any ESG audits that Almirall may request. These contracts cover all the activities for which selection and contracting is managed by the procurement department, both for the procurement of goods classified as 'direct expenditure' (related to the production of our products) and 'indirect expenditure' (related to services not directly linked to production).

Likewise, Almirall's General Conditions for Purchasing have been implemented and are available on the corporate website, in the suppliers' area (in the different languages of companies of the Almirall Group), and include the same commitments on the part of the supplier. These conditions apply by default to all purchases in the absence of a specific contract and include commitments regarding adherence to the Supplier Code of Conduct and participation in any supplier platform required by Almirall, including the platform used for ESG supplier audits.

### **2.3.3. Levers and tools for sustainable supply chain management**

#### **Audits**

The supply chain has an environmental, ethical and social impact on the following aspects related to the consequences of the research, development, manufacturing, transportation, marketing and consumption of our medicines and pharmaceutical specialties:

- The natural environment, such as overexploitation or extinction of species, intensive agricultural practices, water scarcity, industrial pollution, climate change and the emission of greenhouse gases, as well as the felling of forests, the negative impact of which may entail risks of increased costs for companies as a result of penalties, taxes, damage to image, loss of customers, as well as scarcity of resources and deterioration of the planet's health.
- Human rights, working conditions, safety, health or social inclusion of local populations, the negative impact of which may pose a risk of generating conflicts, legal claims, loss of trust or boycotts by stakeholders.
- The financial performance and competitiveness of companies, the negative impact of which can risk generating losses, delays and interruptions in supply, leaving patients without access to the medicines they need.
- The values and moral principles that govern the behavior of companies and their stakeholders, the negative impact of which can generate risks of sanctions for non-compliance with regulations or the perpetration of crimes such as fraud, corruption, bribery and other legal infractions, loss of business talent and customers, as well as serious reputational damage.

To reduce the environmental, social and human rights impact of our supply chain, and in line with our Purpose, Almirall assesses its suppliers remotely through an independent global rating agency using the strictest ESG criteria, and individual action plans are implemented taking into account the results of each supplier's assessment and the potential risks identified during the assessment. Suppliers are included in the audit program on the basis of pre-defined criteria (determined by the type of service, the criticality of the service, the level of expenditure in the last twelve months prior to the screening and the geographic area from which the suppliers operate). Suppliers are included in the audit program on the basis of pre-defined criteria (determined by the type of service, the criticality of the service, the level of expenditure in the last twelve months prior to the screening and the geographic area from which the suppliers operate). Suppliers are included in the audit program on the basis of certain predefined criteria, as detailed below. These predefined criteria (determined by the type of service, the criticality of the service, the level of expenditure in the last twelve months prior to the screening and the geographic area from which the suppliers operate) are:

- **Criterion 1:** Supplies with an expenditure of more than 400,000 euros in all categories in the last 12 months or, if new, with this estimated annual expenditure.
- **Criterion 2:** Suppliers with an expenditure of more than 100,000 euros in the last 12 months in the following groups of most critical materials (direct and industrial materials): production of Active Pharmaceutical Ingredient (APIs), leaflets, auxiliary machinery, logistics operators (order-to-cash, shipping, storage), bulk products, Contract Sales Organizations (CSO), custom synthesis, electricity,

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production of excipients, finished products, folding cartons, gas, general maintenance (environmental policy), glass bottles, ground transportation, rental of industrial equipment, industrial facilities, intermediates, labels, lab equipment, waste destruction of finished products, waste management and environmental services.

- **Criterion 3:** Suppliers representing 80% of the carbon footprint in scope 3, categories 1 and 2, estimated by Almirall on an annual basis.
- **Criterion 4:** Suppliers who are involved in the supply chain of product brands representing 80% of the company's gross margin (top 20) under the Supply Risk Mitigation Plan and that in the last 12 months have had an expenditure of more than 50,000 euros.
- **Criterion 5:** Suppliers with an expenditure of more than 100,000 euros in the last 12 months outside the EU (non-EU, non-Japanese and non-US suppliers for direct materials and R&D, clinical studies).

In the aforementioned remote assessments, from the point of view of human and labor rights risks, human resources (workforce health and safety, working conditions, social dialogue, professional development management and training) and human rights (child labor, forced labor, human trafficking, diversity, discrimination and harassment, human rights of external stakeholders) are reviewed.

The issues have different weights according to the type of industry and size of the supplier. For example, in labor-intensive industries, these issues will weigh more heavily in the assessment. Larger suppliers, with a more significant impact on the supply chain, will be assessed using stricter criteria compared to the smaller suppliers. This differentiation allows for a more accurate and relevant assessment of each supplier, ensuring that the most critical risks are effectively identified and mitigated.

These assessments enable us to have visibility of our suppliers' practices, strengths and areas for improvement. It is for this reason that, at the close of the audits, the high/medium-risk suppliers (classified as such through the score obtained) are asked to take the corrective actions identified as "areas for improvement" in the audits based on an established action plan. They are also asked to undergo a re-evaluation within the following twelve months. Since the start of the collaboration with the audit platform in the ESG area, suppliers that had already been audited in previous years were re-evaluated, and a significant improvement trend was demonstrated in the evaluations.

As regards corrective action plans, they are configured on the basis of the main areas of improvement detected in the supplier evaluations in the four areas indicated. Depending on the complexity of their implementation and the weight of each measure in the overall assessment, considering the type of industry in which they operate and the supplier's overall strategy, our buyers request such measures from suppliers that have not exceeded the specified threshold score. They are given approximately one year to implement them, after which they will be re-assessed. Such measures may include, but are not limited to, some of the following:

- Have documentation at the policy and process level regarding environmental issues.
- Have an equality plan in place within the company when required by regulations.
- Measure greenhouse gas emissions scope 1, 2 and 3.
- Have certifications such as ISO 14001.
- Implement an occupational health and safety management system, such as ISO 45001 certification, to ensure a safe and healthy work environment.
- Monitor the occupational accident rate.
- Have a staff training program.
- Have a due diligence questionnaire with stakeholders, and a whistleblower channel when required by law.
- Have a risk analysis of the supply chain and what actions are taken with suppliers in relation to environmental and social impacts, etc.
- Develop an action plan for waste reduction and efficient resource management, aligned with circular economy principles.
- Foster diversity and inclusion in the workplace by implementing policies and practices that promote equal opportunities and non-discrimination.
- Establish an ethics and compliance committee to oversee the implementation of corporate policies and handle allegations of non-compliance in a confidential and effective manner.

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- Follow-up is done with suppliers who decline to participate to discover the reasons for their decision and action is taken accordingly.

Follow-up is done with suppliers who decline to participate to discover the reasons for their decision and action is taken accordingly. The metrics of the supplier ESG audits at 31 December 2024 were as follows:

	No. of suppliers	% Expenditure (*)
Audited suppliers	373	62%
Suppliers that passed the audit	350	61%

Table 2 Supplier audits

(\*) The reference to '% Expenditure' refers to the percentage represented by the expenditure invoiced to these suppliers in the last 12 months with respect to the total expenditure on suppliers for the same period and managed by the Procurement and External Sites Operations departments, the latter being responsible for the CMOs.

### **Resources: Training and specific objectives**

Since 2019, all Almirall professionals involved in the Sustainable Procurement Program have a specific objective linked to the support and activities related to the program and have received specific annual training on sustainability and Sustainable Procurement, management of the program and use of the audit platform, implementation of mitigation plans for identified risks and specific training on climate change and decarbonization.

Since 2020, specific communication materials have been available to suppliers covering the objectives and expectations of the program, and post-evaluation feedback was provided along with resources and assistance for improving the score and implementing the requested corrective actions, all with the aim of ensuring alignment with the Group's expectations, commitment to sustainability and continuous improvement on the part of the suppliers.

In addition, suppliers have a voluntary training program with specific materials on various topics including sustainability, environment, climate change, sustainable procurement, diversity and inclusion, codes of conduct, etc.

### **Supplier diversity**

The philosophy of the Almirall Group includes fostering relationships with local suppliers in order to promote value creation and generate a positive impact on local society. In this regard, to maximize our positive social impact, we contract Special Work centers (CET) for part of the services of supplying office material and Personal Protective Equipment (PPE), event logistics, as well as the reprocessing and handling of finished products and displays.

#### **2.3.4. Memberships and external recognitions**

As part of Almirall's commitment to sustainability, as of September 2022, the company is a member of the Pharmaceutical Supply Chain Initiative (PSCI). The PSCI is a non-profit organization, comprised of a large number of companies in our industry, whose purpose is to bring together its members to define, establish and promote responsible and ethical practices, human rights and environmental sustainability in the pharmaceutical industry supply chain. Through this membership, Almirall seeks to:

- Access the knowledge and experience of experts in supply chain sustainability.
- Contribute to setting the objectives of the pharmaceutical industry in this area.
- Access a database of sustainability audits of suppliers worldwide, complementary to the audit program mentioned above.
- Help develop our suppliers' capabilities in sustainability.

Furthermore, in 2024, Almirall improved its score in the EcoVadis ESG audit compared to 2023, revalidating its platinum medal for the fourth consecutive year. This result places Almirall in the Top 1% of companies rated by Ecovadis worldwide, which has more than 100,000 rated companies from more than 200 sectors of activity and in more than 180 countries. Part of the substantial improvement in the overall rating is due to the improvement in the results achieved in the Sustainable Procurement dimension, which places us in the top 1% of the companies with the best Ecovadis evaluation in this dimension in our sector.

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### 2.3.5. Sustainable Supply Chain goals and targets

In order to measure and monitor the development and success of the Sustainable Procurement Program, the KPIs have been defined and adjusted over the last few years. The latest revision of the 2024-2030 targets of the program was adopted in 2024.

In 2024 the KPIs have not only been met but also substantially exceeded.

Name of the KPI	Description of the KPI	KPI target/year	% reached in 2024
Suppliers with ESG (*) audit results	% expenditure (**) invoiced to suppliers with results available in the ESG audit program	2024: 62% 2025: 64% 2026: 66%	62%
Suppliers that have accepted Almirall's Supplier Code of Conduct	% expenditure (*) invoiced to suppliers who have accepted the Almirall Supplier Code of Conduct	2024: 57% 2025: 60% 2026: 63%	61%

Table 3 KPIs Sustainable procurement program 2024-2026

(\*) The reference to "results" refers to supplier evaluations that are 2 years old or less

(\*\*) The reference to '% Expenditure' refers to the percentage represented by the expenditure invoiced to these suppliers in the last 12 months with respect to the total expenditure on suppliers for the same period and managed by the Procurement and External Sites Operations departments, the latter being responsible for contract manufacturing organizations

## 2.4. Responsible taxation

### 2.4.1. Almirall's tax policy

The fundamental objective of Almirall's tax strategy is to guarantee strict compliance with the applicable tax regulations and ensure adequate supervision of the tax policy implemented by its subsidiaries in all the territories where it currently operates: Spain, Germany, the United States, Italy, Switzerland, France, Austria, Luxembourg, Portugal, the United Kingdom, Denmark, Sweden, the Netherlands, Belgium, Poland, Czech Republic, Slovakia, Norway and China. It does this while seeking maximum legal certainty, contributing to the fulfilment of the business strategy in the short, medium and long term, and maintaining a position of collaboration and transparency with the respective tax authorities.

Almirall has no presence in territories classified as tax havens, and its commercial transactions with third parties located in these or in any other territories are within the framework of its ordinary industrial and commercial activity. Furthermore, it rejects artificial transfers of earnings to these territories and the opacity provided by the lack of transparency of these territories, in accordance with the international taxation principles and recommendations of the OECD's Committee on Fiscal Affairs. Accordingly, it does not use structures of an artificial nature, unrelated to its activity, for the purpose of reducing its tax burden or transferring earnings.

Transparency of information on tax matters is considered essential to Almirall's tax policy. For this reason, it acts by providing, in the most complete manner, the information and documentation with fiscal significance requested by the competent tax authorities in the shortest possible time. Likewise, it develops and promotes a cooperative and fluid relationship with tax authorities based on respect for the law, trust, good faith, reciprocity and cooperation.

In May 2014, Almirall's Board of Directors agreed to adhere to the Code of Good Tax Practices in Spain, which includes a series of recommendations aimed at achieving application of the tax system through cooperation between the public administration and companies. This adhesion is aligned with the principles and guidelines for action in tax matters established in Almirall's tax strategy.

Almirall is also sensitive to and aware of its responsibility in the economic development of the territories in which it operates, contributing to the creation of economic value through the payment of taxes.

Almirall's tax policy is based on a prudent interpretation of the regulations in force in each jurisdiction. To avoid significant tax risks, the Group implements internal reporting and control systems, supplemented by advice from independent tax experts of recognized reputation. In the event of disputes, we work with the tax authorities to seek solutions that prioritize non-litigious avenues and provide certainty in the tax criteria applied.

The Audit Committee monitors the effectiveness of internal control, internal audit and fiscal risks, reviewing any weaknesses identified during the audit process. It also ensures compliance with accounting and legal standards, and holds quarterly meetings for a continuous follow-up with the external auditors. For more details on the functions of the Audit Committee, please refer to section 2.1.2 "Board Committees".

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Almirall has established a transfer pricing policy for all transactions with related parties that is aligned with the principles established by the main competent international bodies. This policy is reviewed annually to avoid any deviation from these principles. With the aim of achieving legal certainty and increasing transparency and cooperation, since 2007, Almirall, S.A. has been periodically entering into Preliminary Valuation Agreements (hereinafter, APA for *Acuerdos Previos de Valoración*) with the Spanish Tax Agency for transactions between related persons and entities with respect to the distribution of its products by the Group's international subsidiaries. The last Agreement was signed in 2019 and Almirall, S.A.'s request for renewal of this APA has been approved until 2026.

The tax policy as well as the transfer pricing policy are available to all Almirall employees on the intranet.

Likewise, Almirall's Internal Code of Conduct in the Securities Markets, approved by the Board of Directors in 2007, aims to align the actions of the company, its management bodies, staff and representatives with the rules of conduct applicable to activities related to the securities market. This enables Almirall to ensure a conduct that meets the highest standards of diligence and transparency, minimizing the risks of conflicts of interest and ensuring proper disclosure to investors, which contributes to market integrity.

The regulation also addresses insider dealing, rules of conduct in relation to transferable securities and financial instruments, portfolio management and treasury operations. The Audit Committee is responsible for overseeing effective compliance with the obligations set out in the regulations, and reports annually to the Board of Directors on the measures taken to ensure such compliance.

On the other hand, by ticking the Solidarity Company box, Almirall is involved in social transformation by allocating 0.7% of the full amount of its corporate income tax to finance Third Sector projects, i.e., private organizations dedicated to charitable purposes considered to be of general interest that seek to create a fairer, more equal and inclusive society.

#### 2.4.2. Country-by-Country (CbC) Tax Information

The following tables include information for the year ended 31 December 2023 for all tax jurisdictions in which the entities included in Almirall Group Consolidated Financial Statements are resident for tax purposes. In accordance with tax regulations, the figures presented in this table may differ from those in section 2.4.4 "Pre-tax net profit by country" due to the elimination of results from valuation adjustments of investments in subsidiaries or the consideration of consolidated results for those companies that consolidate for tax purposes (as is the case of Spanish and US companies):

Tax jurisdiction (data in thousands of euros)	Income			Earnings before tax	Payments / (Receipts) for company income taxes	Current income tax expense
	From third parties	Related parties	Total			
Austria	33	5,289	5,322	536	106	106
Belgium	4,179	1,866	6,045	368	199	196
Denmark	5,123	3,597	8,720	323	58	74
France	9,272	8,525	17,797	2,548	1,764	840
Germany	151,970	74,446	226,416	50,501	14,402	15,693
Italy	25,479	19,464	44,943	10,477	4,355	4,766
Netherlands	2,997	26,607	29,604	400	40	68
Portugal	1,712	2,312	4,024	421	174	114
Spain	447,223	442,111	889,334	-42,015	-6,531	61
Switzerland	47,142	40,194	87,336	45,263	10,946	7,767
United Kingdom	28,399	7,141	35,540	1,150	86	284
United States	54,631	28	54,659	-72,562	172	217
Others	35	7,169	7,204	283	100	81

Table 4 Tax information country by country

The reasons for the differences between the recorded company tax expense (effective rate) and the theoretical company tax expense (which would have resulted from applying the nominal rate) are detailed below for those jurisdictions where the difference is most relevant:

- Italy: due to non-tax deductible expenses
- Spain: due to non-tax deductible expenses and the application of R&D deductions.
- United States: due to entities' losses and non-recognition of tax credits in their balance sheet.
- Switzerland: due to the exemption of part of the income as a result of entering the patent box regime.

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- Other geographical areas: there are no significant differences, in most cases due to certain expenses not being deductible under tax criteria.

Tax jurisdiction (data in thousands of euros)	Share capital	Unallocated results	Average number of employees	Tangible assets (excluding cash)
Austria	36	2,252	16	74
Belgium	1,203	2,741	14	342
Denmark	17	3,694	6	720
France	12,527	3,750	43	2,066
Germany	25	36,761	342	83,645
Italy	9,211	253,788	97	2,144
Netherlands	4,000	318	9	1,694
Portugal	1,500	3,208	12	296
Spain	80,861	891,574	1,290	228,939
Switzerland	901	7,350	15	9,962
United Kingdom	571	13,907	32	7,352
United States	0	-910,029	80	14,887
Others	1,493	48,018	27	15

Table 5 Financial data by tax jurisdiction

### 2.4.3. Tax contribution

The Total Tax Contribution measures the total impact of a company's tax payments. This assessment is made from the standpoint of the total contribution of taxes paid directly or indirectly to the different administrations as a result of the Company's economic activity.

A distinction is drawn between the taxes that represent a cost to Almirall and the taxes it collects:

- The taxes borne are those taxes that Almirall has paid to the administrations of the different states in which it operates. These are taxes that have represented an effective cost for Almirall, and they basically include payments for income tax, local taxes, miscellaneous taxes and Social Security contributions payable by the company.
- These are taxes that have been paid as a result of Almirall's economic activity without entailing a cost to the company other than that involved in managing them. They basically include net value added tax, withholdings for employees and third parties, and social security contributions payable by workers.

With respect to taxes borne, and more specifically to income taxes paid or collected, for the last three years, the information is as follows (the aggregate amounts are not detailed under "Other countries" as they are not individually significant):

Millions of euros Payments/(Charges) by location	2023			2024		
	Relating to prior years	Payments on account for the year	Total	Relating to prior years	Payments on account for the year	Total
Spain	-8.0	2.9	-5.1	-7.3	0.0	-7.3
Germany	-0.2	10.8	10.6	2.4	12.1	14.5
Italy	0.5	2.2	2.7	1.0	3.3	4.3
Switzerland	1.4	2.9	4.3	7.3	3.3	10.6
United States	0.0	0.0	0.0	0.0	0.0	0.0
Other countries	0.0	1.0	1.0	0.7	1.4	2.1
<b>Group Total</b>	<b>-6.3</b>	<b>19.8</b>	<b>13.5</b>	<b>4.1</b>	<b>20.1</b>	<b>24.2</b>

Table 6 Income tax collected and paid by country

### 2.4.4. Pre-tax net profit by country

Below is a detail of the pre-tax net profit generated in each of the countries included in the Almirall Group's consolidated group. This net profit has been calculated on the basis of IFRS accounting principles at the individual level, in each of the countries indicated, before incorporating consolidation adjustments, which is why it does not coincide with the net profit or loss for the year attributable to the Parent Company in the consolidated annual accounts:

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Net profit before tax (Thousands of euros)	2023	2024
Spain	-53,064	187,775
Holland	-168	313
Belgium	276	367
Portugal	291	536
United Kingdom	845	1,145
France	3,690	2,586
Poland	50	61
Germany	46,018	50,518
Austria	439	524
Italy	8,361	253,447
Denmark	294	329
United States	-211,642	-72,965
Switzerland	42,093	45,243
Czech Republic	48	59
Slovak Republic	23	31
Norway	20	28
Sweden	37	39

Table 7 Pre-tax net profit by country

The increase in pre-tax net profit in Spain and Italy is mainly due to the distribution of dividends from various subsidiaries of Almirall S.A. (Parent Company of the Almirall Group) in which it has direct and/or indirect shareholdings. The dividend amount is €229 million in Spain and €243 million in Italy. As these dividends are distributions of funds between subsidiaries of the same Group, they have no impact on the Group's pre-tax net profit.

Finally, the reduction in pre-tax losses for the United States is due to lower impairment on investments and intangible assets in 2024 compared to 2023.

## 3. Sustainability Management and Double Materiality

### 3.1. Sustainability governance

#### 3.1.1. Context

Almirall has a Sustainability strategy, in line with its commitment to increase its contribution to society, integrating environmental, social and ethical issues in its decision-making process. The sustainability criteria are present in Almirall's day-to-day activities and at all levels of the company, from the Board of Directors, its Committees and the Management Board to its professional teams, also including all its relationships with stakeholders.

This Sustainability strategy, linked to the Group's Purpose and global strategy integrates ethical, social and environmental issues in its more operational implementation, in close collaboration with its stakeholders, attaining a number of objectives, of which the following are most significant: (i) maximize the creation of shared value for our shareholders and other stakeholders and for society in general; (ii) foster a culture of ethical conduct that increases corporate transparency; (iii) strengthen the company's reputation and external recognition; and (iv) identify, prevent and mitigate any adverse effects that might be caused by its activity.

Almirall's Chief Executive Officer is responsible for internal oversight of all sustainability-related activities and for establishing control and management measures, as well as for reviewing sustainability initiatives and programs. The Sustainability Committee reports directly to him or her. The Audit Committee and, in particular, its Chairman, assume the functions related to oversight of all matters relating to sustainability.

In addition, integrity and transparency are fundamental pieces in the sustainability of the company and are integrated into all its processes and activities. In keeping with its commitment to transparency, Almirall clearly and consistently gathers, builds and provides accurate and complete information that is accessible to all of its stakeholders in order to generate credibility and trust in the company. Furthermore, the company and all its European subsidiaries adhere to the Code of Practice of the European Federation of Pharmaceutical Industries and Associations (EFPIA), as well as those of the corresponding local associations in the European countries



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where Almirall operates, such as Farmaindustria in Spain, strictly complying with the applicable legislation in force in each country. In this regard, the company publishes information on payments and value transfers to healthcare professionals or organizations for activities such as consultancy, meetings and advice, in accordance with the corresponding legal provisions. This information is available on the Group's corporate website(www.almirall.com) in the Transparency section.

### **3.1.2.Sustainability Policy**

In July 2024, Almirall's Board of Directors approved an update of the company's Sustainability Policy, the last version of which dated back to 2020. As in recent years, the Chief Executive Officer is responsible for internal oversight in this area. The Corporate Sustainability Committee (formerly known as the Corporate ESG Committee), reporting to the Management Board, is tasked with the following:

- Manage and lead the plans, programs, projects and relevant initiatives related to the sustainability strategy approved by the Board of Directors; and
- Act as a link between the business areas, the organization and the company's governing bodies, proposing the Sustainability Strategy to the Board of Directors, as well as transmitting the approval of proposals and results to the rest of the company.

Almirall understands Sustainability as the meeting of present needs without compromising the ability of future generations to meet their own needs. In the corporate context, sustainability means that companies should not only focus on financial performance, but also take into account the risks and opportunities associated with the social and environmental impacts they may have on their own operations, those of their subsidiaries and along the entire value chain.

Sustainability is a fundamental pillar of Almirall's strategy to create long-term value and a major factor in the way the company runs its activities and plans to achieve its Purpose of transforming the world of its patients, helping them to realize their hopes and dreams of a healthy life.

In order to achieve the aforementioned objectives, Almirall adopts the following general principles in its sustainability policy:

- Align the conduct of its staff with the principles contained in the Code of Ethics, as well as in the rest of the internal policies and regulations, which determine the conduct expected of Almirall employees in the performance of their activities.
- Protect and respect universally recognized fundamental human rights in Almirall's sphere of influence, avoiding any complicity in the violation of the same.
- Foster communication and dialogue with our main stakeholders detailed in section 3.2.5 "Stakeholder identification" through various communication channels, promoting relationships based on mutual trust.
- Promote transparency in the information disclosed on Almirall's performance and activities, and adopt responsible communication practices to prevent manipulation of information and protect the integrity of Almirall's reputation.
- Proactively manage the non-financial risks and opportunities arising from the markets and from the context of business operations.
- Reduce the environmental impact of our activities in the geographies where we operate, promoting sustainable development and the efficient use of natural resources.

The policy is available to all staff on the company's intranet and on the corporate website for all other stakeholders.

### **3.1.3.Sustainability Strategy**

Considering the current context that Almirall is facing, both from a regulatory and market point of view, based on the results of the double materiality analysis (see section 3.2 "Double materiality assessment" further on) and applying a prospective approach, a new 2030 Sustainability Strategy, called "Act4Impact", which was formulated in 2023, validated by the Audit Committee and approved by the Board of Directors in November 2023. This new strategy, which replaces and expands upon the previous one, is positioned as a fundamental lever to achieve the company's Purpose.

The strategy is structured according to four first-level strategic pillars - Planet, People, Patients and Partners - and a fifth cross-cutting pillar - Principles - that governs the way we act in all areas of the company, as shown below:

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- **Planet:** Almirall aims to take effective action on climate change through its science-based Zero Net Emissions Strategy, which includes decarbonization and energy efficiency plans, sustainable mobility and sustainable procurement programs with suppliers. In addition, Almirall is committed to acting on other key environmental vectors by promoting actions in favor of pollution minimization, water management, the circular economy, the sustainable use of resources and the protection of nature.
- **People:** The company is committed to implementing a strong Global Diversity, Equity and Inclusion Plan, enhancing its Talent Management Program to unleash the full potential of its workers, implementing and consolidating its holistic Corporate Wellness Program, ensuring the highest level of occupational health and safety and deploying a Corporate Volunteering Program.
- **Patients:** Almirall will strengthen its commitment to patients through its Engagement with Patient Organizations Plan, with a special focus on the well-being of people with skin diseases. Almirall will also continue to make progress in reinforcing a patient-centered mindset throughout the company, prioritizing patients' needs and placing them at the center of our decisions.
- **Partners:** Almirall intends to consolidate and continue to improve its sustainable procurement program, implementing processes and tools that guarantee an effective governance and ensure respect for internationally recognized human and labor rights, the environment and business responsibility, reinforcing sustainability-related aspects throughout its value chain.
- **Principles:** All of this is to be carried out following Principles of Good Conduct, which guarantee an ethical and transparent culture, applying sound governance, being accountable for all of Almirall's actions and applying best practices in Product Responsibility, Pharmacovigilance, Commercial and Marketing Practices, Transparency and Corporate Culture, Privacy, Corporate Governance, Ethics and Regulatory Compliance.

The Sustainability Strategy, and its work areas and initiatives, are aligned with the Sustainable Development Goals (SDGs) of the United Nations 2030 Agenda, thus confirming the commitment acquired through Almirall's adherence to the United Nations Global Compact in 2022. Although Almirall's business impacts all 17 SDGs to a greater or lesser extent, we have prioritized those in which our contribution is most significant and where Almirall has the greatest capacity for impact and action, as detailed below, in each of the pillars of our strategy:

- **Planet:** Good health and well-being, Affordable and clean energy, Climate action.
- **People, Patients and Partners:** Good health and well-being, Gender equality, Decent work and economic growth.
- **Principles:** Good health and well-being, Reduced inequalities, Decent jobs and economic growth, Peace, justice and strong institutions, Partnerships for the goals.

## ALMIRALL'S PURPOSE

### PRIORITY SDGs



### UNDERLYING SDGs



The initiatives that are part of this strategy will be key to meeting the commitments acquired through a Sustainability Dashboard that was approved by the Board of Directors in June 2024 and is periodically updated. The remaining sections of this report detail information on achievements and progress in the different working areas of the Sustainability Strategy during 2024.

### 3.1.4. Sustainability and ESG goals; initiatives and projects

Almirall has set ambitious sustainability goals that are in line with the United Nations (UN) 2030 Sustainable Development Goals (SDGs) and the Climate Goals of the Paris Agreement.

In defining the sustainability goals, Almirall incorporates the perspective of several key areas to ensure a full alignment with our corporate values and commitments. These goals are developed in collaboration with the heads of strategic areas, who formulate them based on their specialization and technical knowledge, integrating benchmark practices and the views of our stakeholders. Once defined, the proposals go through a rigorous validation process in specific commissions and committees and are then approved by the Board of Directors. Furthermore, a smooth and transparent communication with staff is ensured and they are kept informed through their employee representatives, including the European Works Council. Finally, this process includes a periodic review of the metrics and goals, enabling their continuous adjustment to respond to the needs and expectations of all our stakeholders.

These goals have been defined taking into account a number of issues related to Almirall's products and services, the patients and the geographical areas where we operate.

In the case of products and services, these goals have been set whilst taking into consideration the business as a whole, the patients, therapeutic areas, and the diseases that Almirall focuses on, both because of their high prevalence and because they are diseases that require treatment, such as atopic dermatitis, hidradenitis suppurativa, alopecia areata, vitiligo, psoriasis, (non-melanoma) skin cancer, and rare skin diseases, aware that each of these has a different impact on the attainment of these goals. Likewise, the key regions where the penetration of Almirall's products and services is highest have been identified as Europe, the United States, China, Japan and Australia, which have been taken into account equally when setting the objectives, taking into consideration the potential of these areas to contribute towards them.

Furthermore, the sustainability goals are linked to the variable remuneration of key internal stakeholders, including all members of Almirall's Management Board, the senior leadership, people with direct responsibilities and other relevant stakeholders, both in the short and long term.

With regard to the short-term goals of Almirall's Management Board, that is, for 2024, these are set out in detail below, including an assessment of their level of attainment at the end of 2024:

What	How	Assessment
Promote in all areas of the company the internalization and execution of the principles and initiatives of the sustainability strategy approved by the Board of Directors.	<ul style="list-style-type: none"> <li>Review and update the 2025-2030 Sustainability Dashboard approved by the Board of Directors, after the first full year of data to assure their relevance, accuracy and alignment with best practice.</li> <li>Overall attainment of the goals set for 2024 that are included in the Sustainability Dashboard.</li> </ul>	<p>The results obtained in 2024 for the various indicators do not give rise to concern that the targets set for 2025-2026 will not be met. However, a review and potential update of the indicators and associated targets will be carried out in 2026 to ensure their validity and relevance.</p> <p>Act4Impact, our new 2030 sustainability strategy has been validated by the Corporate Governance Committee, the Management Board, the Sustainability Committee and the Audit Committee, and approved on 8 November 2023 by the Board of Directors.</p> <p>The new Sustainability Dashboard was approved in June 2024 by the Board of Directors and was previously also endorsed by the Sustainability Committee, the Corporate Governance Committee, the Management Board and the Audit Committee.</p>
	<p>Maintaining the current level of excellence in external ESG ratings (Sustainalytics, Ecovadis and CDP) will modulate the degree of attainment of the 5 rating levels for this goal, as described below in the section on KPIs.</p> <p><u>KPIs</u></p> <ul style="list-style-type: none"> <li><u>Underperformance</u>: More than 50% of the KPIs included in the Sustainability Dashboard have not reached their 2024 target.</li> <li><u>Opportunity for improvement</u>: More than 25% of the KPIs included in the Sustainability Dashboard have not reached their 2024 target.</li> <li><u>Targets achieved</u>: All KPIs included in the Sustainability Dashboard have reached their 2024 target.</li> <li><u>Exceptional value</u>: More than 25% of the KPIs included in the Sustainability Dashboard have exceeded their 2024 target.</li> </ul>	

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What	How	Assessment
	<ul style="list-style-type: none"> <li><b>Role model:</b> More than 50% of the KPIs included in the Sustainability Dashboard have exceeded their 2024 target.</li> </ul>	<ul style="list-style-type: none"> <li><b>EcoVadis:</b> in 2024, Almirall improved its ESG scoring by 4% (87/100 vs 84/100). We retained the Platinum Medal.</li> <li><b>CDP:</b> With regard to the Climate Change evaluation, the results reported during the year 2024 and corresponding to the year 2023 are taken as a reference, in which the A-rating has been maintained with respect to the previous evaluation, and in terms of Water Security, it obtains a rating of B in its first year of evaluation (2023).</li> </ul> <p>Taking into account the results in attaining the defined KPIs compared to the targets set for 2024, as well as the overall improvement of the external ESG ratings, the proposed level of attainment for Management to validate, would be "Exceptional value" or "Model to follow".</p>

In addition, a new long-term incentive plan (2024-2026) called the Performance Shares Plan, which is available to the company's senior leadership, was adopted in 2024 and includes two objectives linked to sustainability:

- An objective linked to the Employee Satisfaction - eSat survey that measures social impact through a related question in internal culture surveys: "How happy are you working at Almirall?", which has a weighting of 7.5% of the total incentive. The eSat will be measured according to the following attainment scale with linear interpolation between the thresholds (keeping it above the external 'Top 25% Global' benchmark):
  - o 150% if eSat scores 81 or more.
  - o 100% if eSat scores 79.
  - o 70% if eSat scores 74.
  - o 0% if eSat scores below 74.
- Another target linked to the reduction of the Carbon Footprint in Scope 1 and 2 (i.e., direct emissions and purchased electricity measured against the 2019 baseline and calculated in accordance with the Greenhouse Gas (GHG) Protocol, in line with our Strategic Plan; a target that has a weight of 7.5% of the total incentive. This metric will be measured according to the following scale of achievement with linear interpolation between the thresholds:
  - o 150% if the reduction reaches 25% (corresponding to the target foreseen in 2027).
  - o 100% if the reduction reaches 18% (corresponding to the target foreseen in 2026).
  - o 70% if the reduction reaches 12% (corresponding to the target foreseen in 2025).
  - o 0% if the reduction reaches 8% (corresponding to 2023 data).

The following tables summarize the main projects and initiatives linked to each of the pillars of the Act4Impact strategy and the KPIs included in the Sustainability Dashboard, which will be reviewed periodically to assure its relevance, making the necessary adjustments.

**Planet (not including PLA3 - Zero net emissions, to be activated in 2050)**



Ref.	Initiatives	Indicator	2021	2022	2023	Result 2024	2024 Target	2025 Target	2030 Target	SDG
PLA1	<b>Net zero emissions strategy:</b> - Decarbonization plan (energy) - Sustainable mobility plan - Neutralization strategy	% reduction in carbon footprint scopes 1 and 2	3%	-9%	10% <sup>1</sup>	16%	> 10%	> 12%	> 50%	
PLA2	- Supplier engagement program - Decarbonization plan (logistics operators)	% reduction in carbon footprint scope 3	10%	11%	4%	13%	> 4%	> 8%	> 28%	

Table 8 Sustainability Dashboard - Planet

<sup>1</sup> In accordance with the calculations detected during the AENOR audit, this result that was reported in the 2023 Statement of Non-Financial Information as 8%, was ultimately 10%.

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PLA1: % reduction in carbon footprint scopes 1 and 2: % reduction in carbon footprint in scopes 1 and 2 vs 2019 baseline.

PLA2: % reduction in carbon footprint scope 3: % reduction in carbon footprint in scope 3 vs 2019 baseline.

### People

Ref.		Indicator	2021	2022	2023	Result 2024	2024 Target	2025 Target	2030 Target	SDG
PEO1	Holistic staff welfare and occupational risk prevention program	% occupational accident incidents rate	5‰	7‰	7.7‰	4.4‰	< 8‰		< 7‰	3 SALUD Y BIENESTAR 8 TRABAJO DECENTE Y CRECIMIENTO ECONÓMICO
PEO2	Corporate Talent Program and global strategy of the People & Culture Department	Average no. of hours of training per worker	11	15	33	36.3	> 33	> 35	> 45	8 TRABAJO DECENTE Y CRECIMIENTO ECONÓMICO
PEO3		% turnover	12%	12%	10%	8.9%	< 10%			
PEO4		eSat (satisfaction survey)	N/A	75	77	79	> 78		> 81	
PEO5	Diversity, equity and inclusion program	% women in senior leadership	24%	36%	40%	40%	> 40%		45-55%	5 IGUALDAD DE GÉNERO
PEO6		% gender pay gap	N/A	-2.9%	-2.5%	-2.7%	+/-2.5%		+/-2%	

Table 9 Sustainability Dashboard - People

PEO1: % occupational accident incidence rate: number of work-related accidents resulting in sick leave per 1,000 workers.

PEO2: # hours of training per employee: annual number of training hours vs average number of employees.

PEO3: % turnover: % annual number of persons leaving vs average annual number of workers.

PEO4: eSAT: % score in the annual culture survey

PEO5: % women in senior leadership: % number of women in grade 11+ (at end of year) vs total number of women and men in grade 11+ (at end of year).

PEO6: % reduction in gender pay gap: weighted average per country taking into account the distribution of Equal grades and the weighted average number of workers per country. See further details of calculation in section 5.2.11 of this report.

### Patients

Ref.	Initiative	Indicator	2021	2022	2023	Result 2024	2024 Target	SDG
PAT1	Program of engagement with patient associations and generation of a patient-focused corporate mindset	Patients impacted by our dermatological strategic portfolio (x 1,000 patients)	N/A	N/A	N/A	Not available at the date of preparation of this report	>731	3 SALUD Y BIENESTAR

Table 10 Sustainability Dashboard - Patients

PAT1: Thousands of patients treated by our strategic dermatology portfolio in one year (in 2024: Ebgllyss, Ilumetri, Klisyri and Wynzora)

### Partners

Ref.	Initiatives	Indicator	2021	2022	2023	Result 2024	2024 Target	2025 Target	2030 Target	SDG
PAR1	Program for Sustainable Procurement and Supplier Engagement for carbon footprint reduction	% spending with ESG audited suppliers	46%	58%	59%	62%	>62%	>64%	>75%	9 INDUSTRIAL INNOVACIÓN E INFRAESTRUCTURA 17 ALIANZAS PARA LOGRAR LOS OBJETIVOS
PAR2		% spending with suppliers that have accepted the Code of Conduct	36%	41%	54%	61%	>57%	>60%	>75%	
PAR3		% emissions with suppliers that have a carbon scorecard	N/A	N/A	53%	57%	>55%	>58%	>69%	

Table 11 Sustainability Dashboard - Partners

PAR1: % spending with ESG audited suppliers: % spending with suppliers for which we have ESG audit results.

PAR2: % spending with suppliers that have accepted the Code of Conduct: % spending with suppliers that have accepted Almirall's Supplier Code of Conduct.

PAR3: % emissions with suppliers that have a carbon scorecard: % greenhouse gas emissions from suppliers with a valid Ecovadis carbon scorecard impacting our Scope 3, Cat 1 & 2 carbon footprint

The expenditure referred to in these KPIs is that which is managed by the Global Procurement and External Sites Operations teams

## Principles

Ref.	Initiatives	Indicator	2021	2022	2023	Result 2024	2024 Target	2025 Target	2030 Target	SDG
PRI1	Diversity and independence in the Board of Directors	% independent directors on the Board of Directors	62%	67%	67%	80%	>50%			5 EQUIDAD DE GÉNERO
PRI2		% women on the Board of Directors	31%	33%	33%	40%	>40%			9 INDUSTRIA, INNOVACIÓN E INFRAESTRUCTURA
PRI3	Sustainability in governance	% staff trained in sustainability	-	-	-	KPI not active	Not applicable	>40%	100%	16 PAZ, JUSTICIA E INSTITUCIONES SÓLIDAS
PRI4	Ethical behavior and integrity	% staff trained in the Code of Ethics	38%	85%	93%	98%	>95%	100%		8 TRABAJO DECENTE Y CRECIMIENTO ECONÓMICO 9 INDUSTRIA, INNOVACIÓN E INFRAESTRUCTURA

Table 12 Sustainability Dashboard - Principles

**PRI1:** % independent directors on the Board of Directors: % number of independent directors on the Board of Directors vs total number of members.

**PRI2:** % women on the Board of Directors: % number of women on the Board of Directors vs total number of members.

**PRI3:** % workers trained in Sustainability: % of Almirall workers trained in year n-1 + % of Almirall workers trained in year n.

**PRI4:** % employees trained in the Code of Ethics: % of Almirall workers trained in year n-1 + % of Almirall workers trained in year n.

Almirall, as a pharmaceutical company, faces several future challenges related to sustainability. Some of the most relevant challenges are climate change, scarcity of natural resources, new environmental regulations, working conditions in the supply chain, and the expectations of consumers and patients who demand sustainable products and greater transparency in business practices. The transition to a circular economy, environmental protection and the preservation of biodiversity are also included.

To address these challenges, the company has developed a number of innovative projects and solutions, which are explained in more detail in each section of this report. Some examples are given below:

- The "Energy Masterplan", which identifies key areas of investment for the coming years, seeks to address renewable energy in all business units, including the purchase of green energy with Guarantee of Origin and the promotion of self-generated renewable energy.
- The progressive electrification of the car fleet, starting to replace internal combustion vehicles with electric or hybrid plug-in vehicles, not only reduces the carbon footprint, but also improves the energy efficiency of operations. This includes the installation of on-site charging infrastructure to facilitate the transition towards the decarbonization of the fleet.
- The Supplier Engagement Program, which involves suppliers that represent a high impact on the carbon footprint, aims to align their goals with the ambition in Scope 3 and identify specific opportunities for improvement and a positive impact on Almirall's footprint.
- The *YouFeelWell* program, which takes a holistic approach to well-being, focuses on improving the physical and mental health of staff, promoting sporting activities and good lifestyle habits.
- The talent management and development programs reflect Almirall's commitment to the professional development of its workers, ensuring that they have the necessary tools and knowledge to grow within the company and contribute to its strategic objectives.
- The initiatives led by an interdisciplinary team implement and drive forward policies and actions that incorporate the concept of "eco-design" and sustainable packaging in order to reduce the environmental impact of the products.

However, in the future, Almirall must continue to work on other projects and initiatives to address the challenges mentioned above. This includes strengthening practices in order to comply with the new regulations on sustainability and the environment, ensuring that these do not negatively affect market competitiveness. We must continue innovating in products and processes to meet patients' expectations, which means developing more sustainable and effective medicines. Furthermore, it is crucial to develop strategies to integrate sustainability into all phases of research and product development.

In the coming years, continuous training programs for staff must be encouraged, ensuring that they are trained in the latest sustainable practices and emerging technologies. This will not only improve operational efficiency,

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but also strengthen the corporate culture around sustainability. The company is also considering increasing its involvement in global initiatives that promote sustainability in the pharmaceutical industry.

In addition, Almirall will continue to invest in the electrification of its vehicle fleet and in the implementation of energy-efficient technologies in its facilities, as planned. These efforts will contribute to reducing the carbon footprint and meeting emission reduction targets. The continuation of projects aimed at the sustainability and resilience of the supply chain is essential for ensuring that all suppliers comply with the standards on sustainability and environmental and social responsibility. In short, a holistic and proactive approach is required in order to meet future challenges, ensuring that sustainability remains as central a component of business strategy as it is today.

### 3.1.5. Sustainability assessments and ratings

In 2024, Almirall received the results of the Sustainability and ESG assessment carried out by EcoVadis, having obtained a score of 87/100, which represents an improvement of more than 4% over the previous year, maintaining the Platinum Medal. Since 2019, we have improved our score by more than 43%, demonstrating ongoing improvement. Compared to the 2023 results, in which Almirall obtained an overall score of 84/100, in 2024 there has been considerable improvement in the areas of "Sustainable Procurement" and "Ethics".

EcoVadis is a universal provider of sustainability and ESG ratings, having assessed over 100,000 companies in over 200 business sectors in more than 180 countries. It is worth noting that Almirall is in the top 1% of companies evaluated by Ecovadis worldwide.

Likewise, in 2024, Almirall's overall ESG management and performance was assessed and rated by other ESG rating agencies and entities. For example, Sustainalytics conducted an assessment of Almirall's environmental, social and governance aspects, awarding an ESG Risk Rating of 16.3, within the Low Risk category. This result slightly improves on the one obtained in 2023, placing Almirall in the Top 4% of companies in the "Pharmaceuticals" business sector top-rated by Sustainalytics, ranking 33 out of 852 companies. Additionally, as of the closing date of this report, Almirall has been included in Sustainalytics' list of companies with the best ESG Risk Rating Scores for 2025. This recognition highlights the leading companies in ESG risk management at global, industry and regional levels. Almirall is on the list of companies with the best ESG Risk Rating Scores by industry, ranking in the top 6.7% of companies with the lowest ESG risk within our peer group.

Sustainalytics, a Morningstar company, provides high-quality environmental, social and corporate governance (ESG) analytical research, ratings and data for institutional investors and companies. Sustainalytics' ESG dashboards provide detailed information on environmental, social and ethical risks in 172 countries, having assessed more than 20,000 companies worldwide.



Almirall has been included in the IBEX ESG index since its creation in October 2023. The IBEX ESG index was created by Bolsas y Mercados Españoles (BME) with the aim of providing independent information to the market on the performance of companies in environmental, social and governance (ESG) aspects. In its initial composition, Almirall was included along with 46 other listed companies and has remained in the first update made by BME in September 2024. The IBEX ESG index selects its constituents according to certain sustainability criteria and is weighted by free float-adjusted capitalization.

Apart from these overall ESG ratings, other specific scores on specific aspects of ESG are listed in this document, e.g., ISO 14001:2015 certification for environmental management, ISO 50001:2018 certification for energy management, ISO 45001:2018 certification for occupational health and safety management, 'Top Employer' certification, CDP score on climate change, etc.

### 3.1.6. Other ratings: CDP Disclosure

As an exercise in transparency, since 2014, Almirall has reported its environmental performance on climate change to CDP. CDP assesses climate change performance through a form and classifies it into 4 levels, from the most basic level, Disclosure D, to the highest, Leadership A.

It is also broken down into two sub-levels, each level indicating the lowest category with a "-" (as shown in the following picture):

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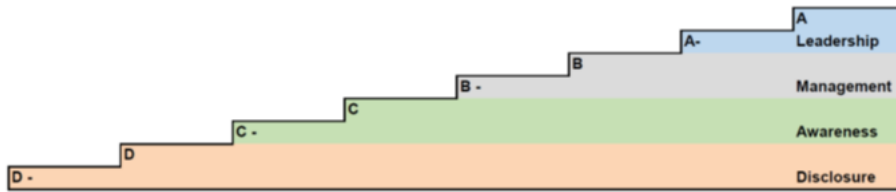


Illustration 1 CDP Ratings

In 2022 and 2023, Almirall achieved the Leadership A- rating, which was revalidated in 2023. On the date of this report, the rating for the year 2024 is not yet available. Of the various dimensions assessed by CDP to obtain our overall rating, Almirall’s management of “Objectives” and “Management of scope 1, 2 and 3 emissions” stand out at the Leadership level, while the dimension with the greatest opportunity for improvement is “Emissions reduction initiatives”, which is expected to improve as and when all the actions on our roadmap towards zero net emissions are developed and implemented.

Almirall	2022	2023	2024
CDP score	A-	A-	Not available

Table 13 Evolution of Almirall's CDP score

In terms of Water Security, Almirall obtained a B rating in its first year of assessment (2023). In 2024, the CDP questionnaire on water cycle management has been submitted, but the result has not yet been obtained as of the date of preparing this report.

### 3.1.7. Stakeholder relations

Details of how Almirall interacts with the different stakeholders are set out below:

- **Working people:** Almirall must work to attract, promote and retain talent and to empower 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, must be governed by the principles of transparency, proximity and cooperation, based on knowledge of the needs of these groups in order to implement joint programs and projects that contribute towards improving people’s health and well-being.
- **Regulatory bodies, governments, administrations:** The company must involve regulators, governments and administrations around the world in the manufacture, development, review, approval and marketing of its products.
- **NGOs and other foundations:** Almirall must collaborate with non-governmental entities in its sustainability priorities, promoting social action initiatives and our employees’ participation in volunteering initiatives in these areas.
- **Shareholders, investors, financial institutions and auditors:** the company must follow the highest standards in its relationships with shareholders, investors, financial institutions and auditors.
- **Suppliers and other partners in the value chain:** the Company must operate with suppliers and other third parties on the basis of respect for the law and the assumed contractual commitments, quality of service and contractual good faith, and expect the same from them, with this constituting the basis of the relationship between Almirall and its suppliers.
- **Society:** Almirall must act with full awareness of its environment and the social needs of the different countries in which it operates.

Almirall uses a variety of communication mechanisms to ensure that administrative, management and supervisory bodies are informed about the views and interests of those stakeholders affected with regards to sustainability-related impacts. These mechanisms include:

1. **Regular meetings:** Meetings are held with workers’ representatives to gather their concerns, including local works councils and the European Works Council. Regular intranet publications and internal meetings are also held with areas and departments to inform them of sustainability initiatives and to gather their opinions and suggestions.
2. **Working Groups:** Almirall is involved through representatives in pharmaceutical industry working groups (in Spain's case, Farmaindustria), at European level (EFPIA) and other industry initiatives (the



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Pharmaceutical Supply Chain Initiative) to jointly address common industry challenges and opportunities and implement best practices.

3. **Information and interaction with investors, financial institutions and auditors:** Almirall regularly organizes Investors' calls and private meetings with investors to discuss different topics including the company's sustainability plans and strategy. It also prepares information that is reviewed by the company's internal and external auditors.
4. **Exchange with suppliers:** Within the framework of the Supplier Engagement Program and the Key Supplier Relationship Program, exchanges of information are carried out regarding Almirall's sustainability programs and key suppliers and partners, to identify potential synergies and action plans in relation to carbon footprint reduction, among others.
5. **Open communication with regulators, governments and administrations:** Almirall maintains open and transparent communication with regulatory bodies and administrations. This includes disclosing relevant information on its products, processes and sustainability practices, as well as responding to any queries or requests for information from these bodies.

All the information gathered through these mechanisms is shared with specific Advisory Boards that have been set up for the Planet and People pillars, and is also channeled through the Sustainability Committee, which reviews and discusses the proposed strategies and actions. Ultimately, this information and the actions that can be derived can be prioritized and incorporated into the overall company strategy during its definition and implementation. The final strategy is approved by the Management Board and the Board of Directors, ensuring full alignment with corporate objectives and a strong commitment to sustainability.

### 3.1.8. Specific sustainable financing

Almirall's goal is to minimize impact on the environment and in particular on climate change. As proof of this, the renewal of the revolving credit facility for the amount of 275 million euros was made on the basis of compliance with a series of ratios linked to sustainability that will affect the Parent Company. To this end, different environmental ratios have been included to credit the variable interest rate margin of this loan:

#### KPI 1: Carbon Footprint

**Description of the KPI:** Absolute Reduction of Greenhouse Gas Emissions (Scope 1, 2 and 3).

	Description	Base year	2024	2025	2026
KPI 1	CO2e emissions - GHG Reduction vs. Baseline Emissions Inventory Scope 1, 2 and 3 follows the guidelines of the Greenhouse Gas (GHG) Protocol of the World Business Council for Sustainable Development (WBCSD) and World Resources Institute (WRI).	Scope 1 + 2: December 2019: 6.865 (tCO2e)	-10%	-12%	-18%
		Scope 3: December 2019: 162.840 (tCO2e)	-4%	-8%	-8%

#### KPI 2: Suppliers Carbon Scorecard

**Description of the KPI:** % of greenhouse gas emissions from suppliers with a valid Ecovadis<sup>2</sup> carbon rating, impacting the carbon footprint in Scope 3, Categories 1 and 2.

	Description	Base year	2024	2025	2026
KPI 2	Percentage of emissions with suppliers assessed through the EcoVadis platform	Performance 2023: 53%	55%	58%	60%

<sup>2</sup> The EcoVadis Carbon Rating provides an independent assessment of the carbon management system and performance of suppliers. The score will identify the levels of carbon management performance and show specific strengths and areas for improvement targeted at each level.

### Result achieved

KPI	2024 Target	Result 2024	KPI compliance
KPI 1	Scope 1 and 2: -10%	-16%	Yes
	Scope 3: -4%	-13%	Yes
KPI 2	53%	57%	Yes

As at 31 December 2024, all targets set in the revolving credit facility agreement for the various KPIs have been achieved.

## 3.2. Double materiality assessment

### 3.2.1. Introduction

The European Commission aims to transform the European Union into a modern, resource-efficient and competitive economy with net zero greenhouse gas emissions by 2050. This goal aligns with global efforts in the midst of a climate crisis. The legally binding Paris Agreement established in 2015 seeks to limit the global temperature increase to less than 2°C above pre-industrial levels, with the aspiration of restricting it to 1.5°C. This requires reductions in greenhouse gas emissions, an enhanced adaptive capacity and the promotion of climate resilience and sustainable development.

In addition to its climate commitments, the European Union seeks to safeguard the natural capital and protect the health and well-being of citizens from environmental risks. The Corporate Sustainability Reporting Directive (CSRD) is central to this effort. This legislation requires improved standards for sustainability reporting by companies, on a par with financial reporting. It aims to improve the transparency and comparability of environmental, social and governance (ESG) performance data, enabling more informed and sustainable decision-making for both investors and stakeholders.

The CSRD requires large companies to disclose detailed information on risks, opportunities and impacts related to ESG issues. This directive introduces the concept of Double Materiality, which considers both the impact of business activities on the environment and society, and the associated financial risks and opportunities, as well as the dependencies between them. Within this regulation topics will be disclosed such as climate change (E1), pollution (E2), water use and marine resources (E3), biodiversity (E4) and the circular economy (E5), as well as social and governance aspects, such as own staff (S1), workers in the value chain (S2), affected communities (S3), consumers and end-users (S4) and business conduct (G1).

The structure of the dissemination of these material topics within the framework of the CSRD is organized around four main areas: Governance, Strategy, Risk Management and Metrics and Targets. This holistic approach ensures that companies not only identify and manage their ESG impacts, but also integrate these considerations into their business strategies and decision-making processes.

For companies such as Almirall, which meet at least two of the following three requirements: having more than 250 employees, a net turnover of more than 50 million euros or assets of more than 25 million euros, the CSRD requires compliance with the directive for reports published in 2025, corresponding to the 2024 financial year.

### 3.2.2. Double materiality

Double Materiality is an approach that takes into account two essential dimensions when it comes to assessing the relevance of sustainability issues for a company: impact materiality and financial materiality. This concept, fundamental to the CSRD, guides companies in identifying material issues to disclose. Furthermore, it implies that a company must assess both the impacts of its activities on people and the environment (inside-out approach) and the financial effects of sustainability-related risks and opportunities (outside-in approach).

The Double Materiality assessment process is divided into two components. Impact materiality refers to the significant effects, positive or negative, that the company's activities have on the environment and the people along its value chain. This includes both internal operations and interactions with suppliers, customers, partners and local communities. These impacts are identified through a detailed analysis of the company's activities and their environmental and social consequences.

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Financial materiality, on the other hand, focuses on the risks and opportunities that sustainability issues present to the company from an economic, compliance and reputational perspective. This covers how environmental, social and corporate governance issues can influence financial performance, market position, company reputation, access to capital and debt markets, and other critical aspects of the business. The assessment considers both current and future risks, whether short-, medium- or long-term.



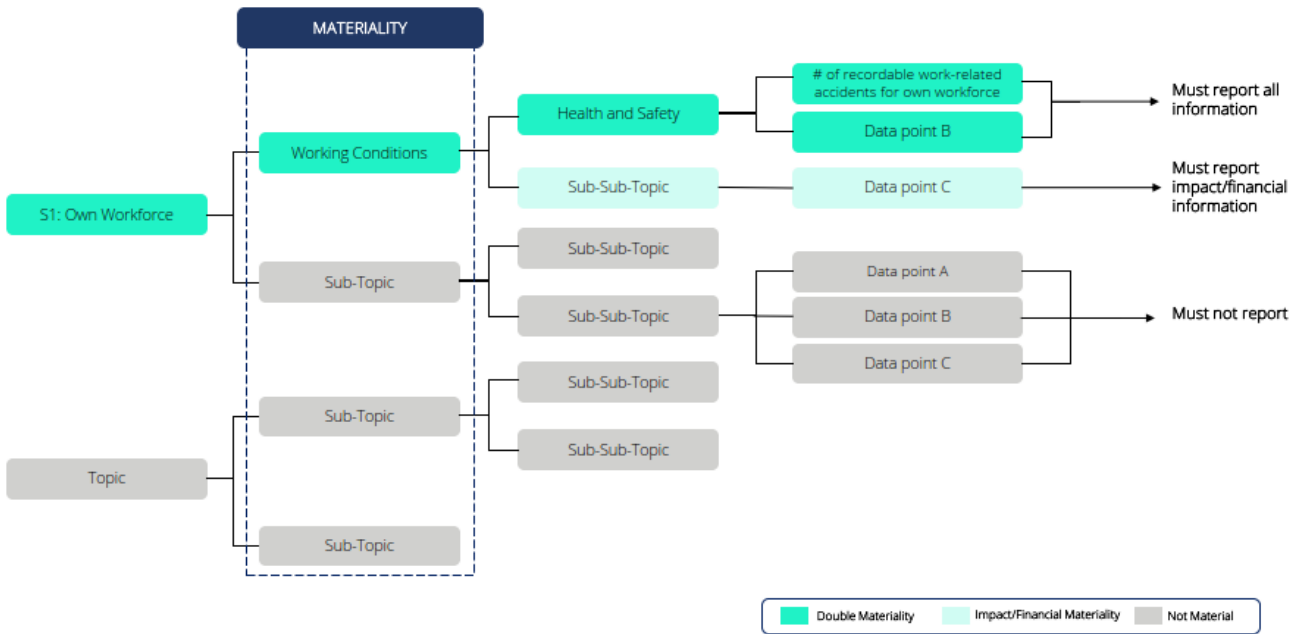
The results of the Double Materiality assessment are essential to comply with the disclosure requirements of the CSRD. They provide a basis for the company to report on the most relevant material issues, aligning its sustainability practices with regulatory and market expectations. Furthermore, these results help to integrate sustainability into business strategy, improve risk and opportunity management, and strengthen the transparency and confidence of investors and other stakeholders. For Almirall, this practice is fundamental to ensure a sustainable and resilient activity in the sector, aligned with sustainable development objectives and current regulatory requirements.

This assessment also serves to categorize issues that are relevant to Almirall and to determine whether they should be reported. The CSRD structures the contents to be reported in a hierarchical format that includes Topics, Sub-Topics, Sub-Sub-Topics and specific indicators, also known as "Data Points".

- **Topic:** A broad area of interest or focus that is considered essential within the sustainability reporting framework (e.g., own staff).
- **Sub-topic:** A specification within a broader topic that allows for a more detailed and specific analysis of a particular aspect (e.g., equal treatment and opportunities).
- **Sub-Sub-Topic:** An even more detailed division of a sub-topic that allows you to focus on very specific and technical aspects within a Sub-topic (e.g., Diversity).
- **Indicator ("Data Point" or "DP", hereinafter):** A quantitative or qualitative metric used to measure and evaluate performance or impact in relation to a specific Sub-Topic or Sub-Sub-Topic (e.g., percentage of functionally diverse workers in own workforce broken down by gender).

This approach facilitates a clear understanding and effective communication on how companies address various aspects of sustainability. Following this structure and with the aim of disseminating the information to be reported with the highest possible granularity, a decision tree logic is used, as shown below. This tree indicates that if a Sub-Sub-Topic is assessed as material, Almirall must report its corresponding Data Points. However, if a Sub-Sub-Topic is assessed as relevant in its financial dimension only, Almirall should only report DPs related to risks and opportunities, but not those related to impact.

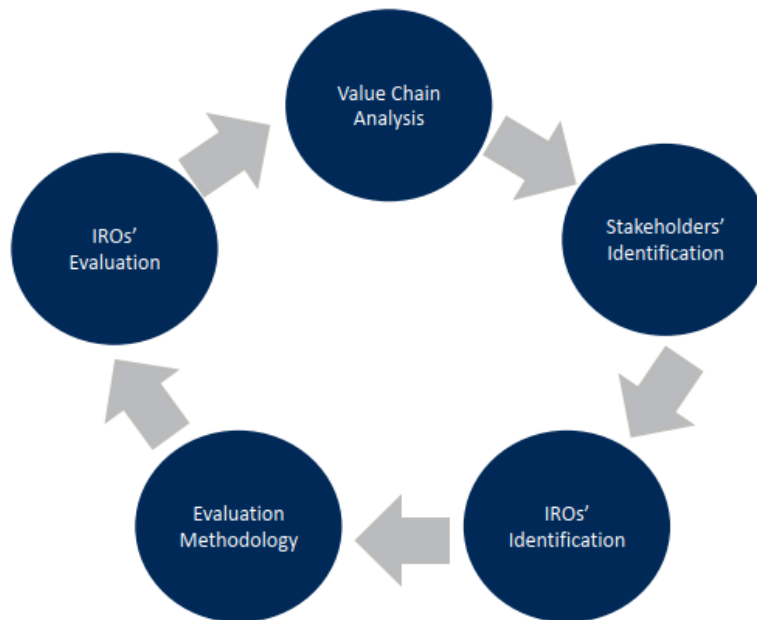
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This logic is based on the assessment of IROs (Impacts, Risks and Opportunities) aligned with all Sub-Topics and Sub-Sub-Topics defined by the CSRD. This assessment facilitates the dissemination of the Sub-Sub-Topics and their associated Data Points. As a result, a list is obtained with all the Sub-Topics classified into material and non-material and all the DPs to be reported.

### 3.2.3. Assessment process

A comprehensive assessment process has been carried out, starting with the value chain analysis and ending with the assessment of all identified IROs. Each stage of this process has been carefully defined and delineated to meet the requirements of the CSRD.



The assessment process includes the following five steps:

- **Analysis of the value chain:** Almirall's value chain is mapped, delineating the boundaries and scope of each phase to ensure a thorough understanding of operational impacts and interconnections.
- **Identification of stakeholders:** Internal and external stakeholders are identified, including the allocation of geographies, and the definition of the commercial relationships that influence Almirall's operations.

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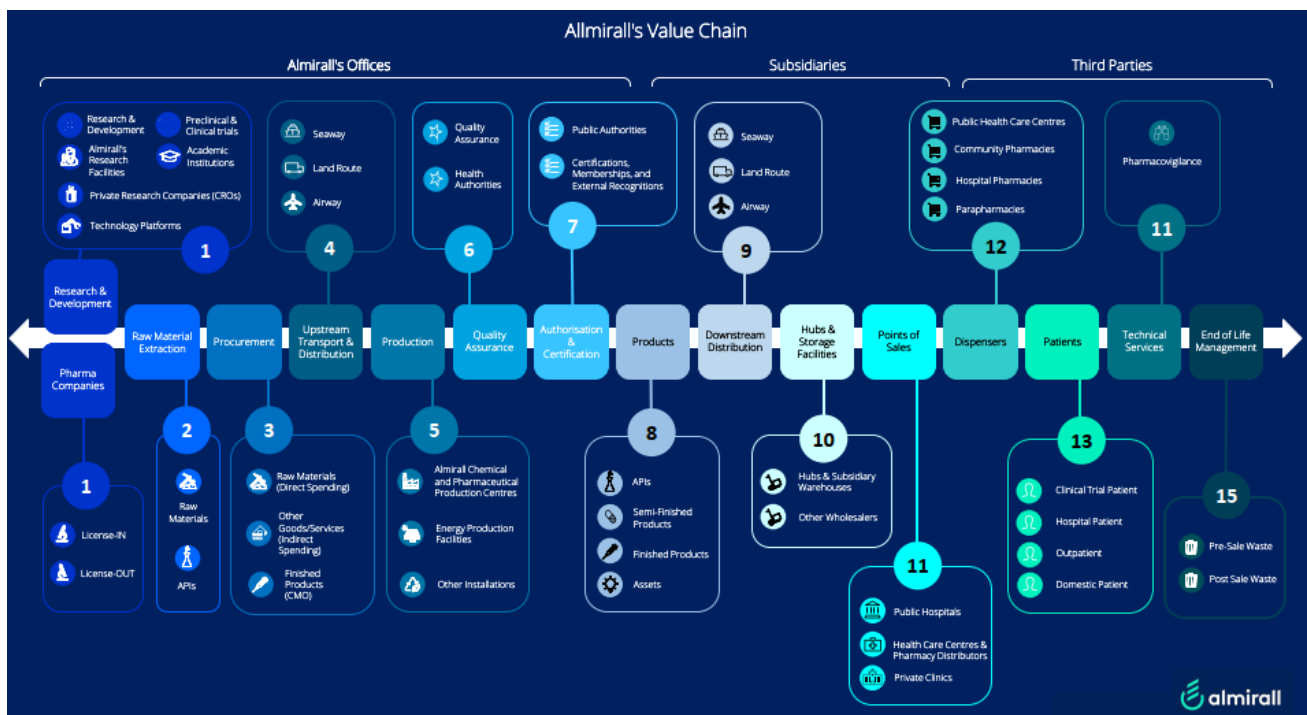
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- **Identification of IROs:** IROs are defined for each Sub-Sub-Topic (according to the tree described above), ensuring that all potential areas of impact are considered and adequately addressed.
- **Assessment methodology:** Common standards are established for carrying out the assessment of the IROs. This includes the establishment of criteria for the quantification and final assessment.
- **Assessment of IROs:** IROs are assessed with all stakeholders, with the aim of validating the findings and ensuring the accuracy and relevance of the assessment results.

Within the framework established by the CSRD, Almirall's needs have been aligned, adapting certain degrees of adjustment to ensure the reasonableness, tangibility and applicability of the results. Furthermore, the implementation of Double Materiality is not only fundamental for standardizing these results and facilitating comparisons between companies, but also as a tool for understanding the current situation in terms of the company's own sustainability and to establish action plans that promote real changes.

### 3.2.4. Analysis of the value chain

In order to accurately identify the IROs related to Almirall's operations, a value chain analysis was carried out as a first step. This analysis involves mapping the company's main activities, distinguishing between internal and external activities, the locations in which we operate and our main business relationships. The ultimate goal is to validate the extent to which IROs affect the different stages of the value chain, as shown below:



In addition, the assessment of business relationships assumes a critical role, as they often influence the sustainability and ethical implications of a company's operations. Through the analysis of these connections, Almirall can identify potential Risks and Opportunities associated with suppliers, partners and other external entities involved in its value chain.

This analysis serves both to identify areas where sustainability practices can be improved and to identify vulnerabilities where the company's operations could be negatively affected by external factors. In addition, this comprehensive scrutiny helps the company to enforce sustainability standards across its network, ensuring that all business relationships are aligned with the company's sustainability objectives and regulatory requirements.

### 3.2.5. Stakeholder identification

In the 2023 Double Materiality exercise, a wide range of documentation was collected and analyzed to thoroughly assess and identify key sustainability challenges. This involved the use of supplier questionnaires to measure external business impacts, consultations with investors to understand their perspectives on sustainability priorities, and surveys of Almirall employees to gather internal views and know-how. In addition, internal documentation from partners and other relevant stakeholders was reviewed to ensure a holistic understanding of the environmental, social and governance (ESG) factors influencing the organization. This methodical approach facilitated a sound analysis, aligning the company's sustainability efforts with the expectations and requirements of all key stakeholders.

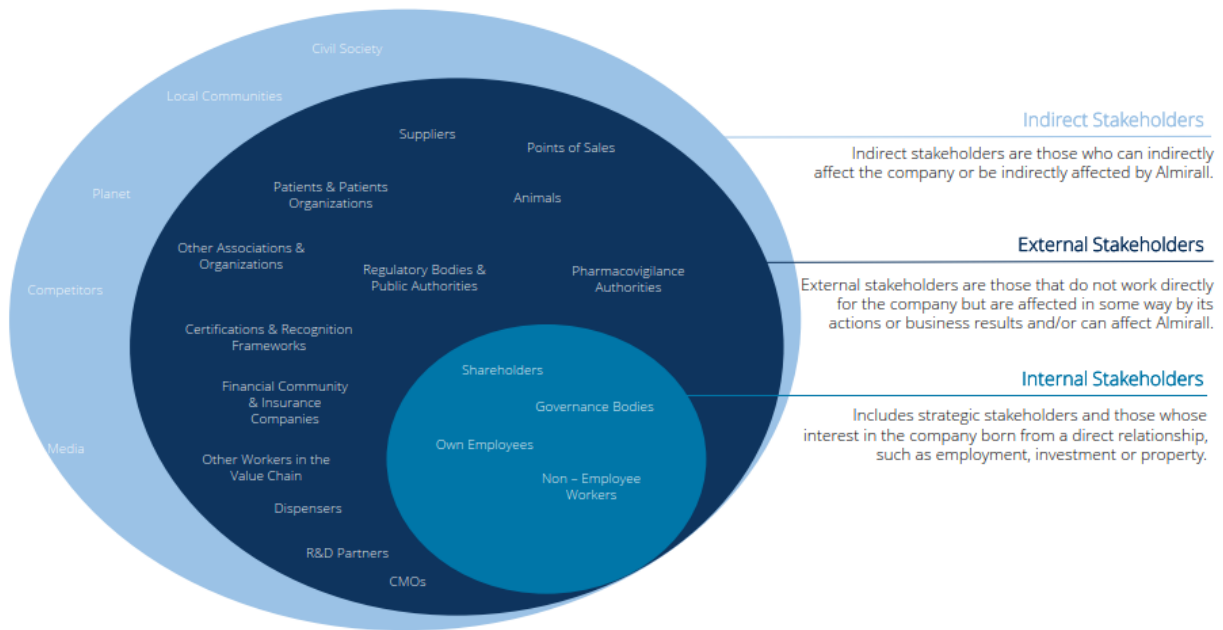
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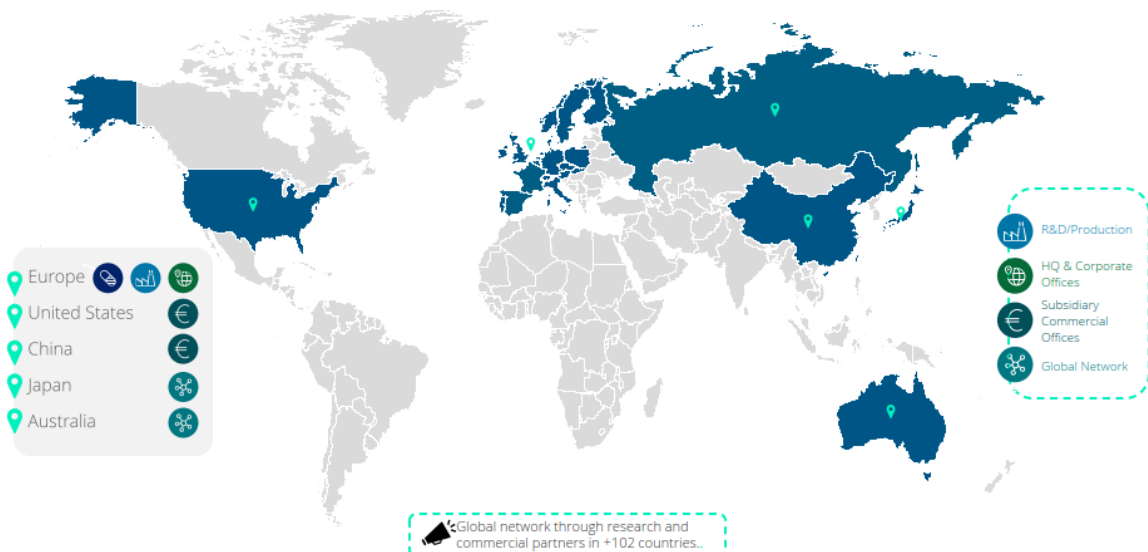
This Double Materiality exercise carried out in 2024 also involves the systematic identification and assessment of Impacts, Risks and Opportunities, which are essential to understanding both the effects of the external environment on the organization and the impact of the organization on the environment and society. To carry out this exercise effectively, key stakeholders are classified into two main groups:

- Internal stakeholders: they are primarily responsible for identifying and assessing risks and opportunities that directly affect the internal operations and strategic direction of the company. This includes investors, executives, employees and internal departments whose day-to-day operations and decision-making processes are critical to the company's sustainability initiatives.
- External stakeholders: This group is responsible for identifying and assessing the positive and negative impacts that the company's activities may have externally on society and the environment. This includes suppliers, customers, local communities, regulators and non-governmental organizations, among others, whose input helps shape the company's external sustainability practices and policies.

The following chart illustrates the interconnections between internal stakeholders, external stakeholders and indirect subsidiaries. It also provides detailed information on which stakeholder groups fall into each of these three categories:



Initially, the entire value chain has been mapped to identify how Almirall's operations affect different geographies and stakeholders (internal and external). This comprehensive assessment covers all related activities and business relationships to ensure a comprehensive coverage and understanding of potential impacts at each stage. Subsequently, all identified IROs are mapped to these value chain elements.



### 3.2.6. Identification of IROs

The identification of IROs has been carried out at the level of Topic, Sub-Topic and Sub-Sub-Topic to ensure that all sustainability issues specified by the CSRD are covered. In this way, a total of 255 have been identified and mapped within the value chain to identify those activities most likely to be affected by them.

No entity-specific IROs have been identified beyond the Topics established by the ESRS. The number of IROs identified by Topic is shown below.

Topic	Identified IROs
E1 – Climate Change	33
E2 – Pollution	14
E3 – Water and marine resources	12
E4 - Biodiversity and ecosystems	21
E5 – Circular economy	23
S1 - Own workforce	32
S2 – Workers in the value chain	41
S3 - Affected communities	17
S4 - Consumers and end-users	32
G1 - Business conduct	29
<b>TOTAL</b>	<b>255</b>

In identifying the IROs, special attention has been paid to understanding their interconnections. The process involves an analytical examination of how specific impacts within business operations or external environments are linked to potential risks and opportunities.

In this process Almirall has employed a systematic approach to identify, assess, prioritize and monitor potential and actual impacts on people and the environment. In this way, environmental and social governance standards are met, and their impact on these critical areas is managed proactively.

### 3.2.7. Assessment methodology

Once a complete list of all IROs has been compiled, an assessment of the impact materiality and financial materiality of each IRO is carried out. The methodology has been developed to streamline, as far as possible, a process that is qualitative in nature, as set out in the CSRD.

To ensure that the assessment is consistent with Almirall's previously established frameworks, some specific criteria of the risk assessment system already in place in the company have been incorporated into the methodology.

As a result, the assessment of IROs is integrated into the overall risk management process and is used to assess the overall risk profile and risk management processes. Given the relevance of this assessment to the company's strategy and vision, the framework set out in the assessment methodology is also integrated into the overall management process.

#### *Impact materiality*

Impact materiality is determined as the combination of severity and probability of occurrence. Severity is determined as the combination of scale (magnitude of impact) and scope and, in the case of negative impacts, the extent to which these could be remediated is also included in the assessment. The probability of occurrence is based on a combination of probability and time horizon.

All impact materiality factors are applied identically for all identified Positive and Negative Impacts, except for the scale factor. For Positive Impacts, the Scale assesses the impact of IROs on the magnitude of the Environmental and Social sphere. In the case of Negative Impacts, the Scale includes an additional assessment of their impact on Human Rights (HR). In both cases, the highest value of the two or three assessed quantities is taken. In addition, for each Impact, a binary assessment (YES or NO) is made on its influence along the different stages of the value chain (defined in section 3.2.4).

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### Financial materiality

Financial materiality is determined as the combination of probability of occurrence and severity. The probability of occurrence is assessed in the same way as for impact materiality. Severity, on the other hand, is determined as the assessment of different magnitudes of complementary scale. These magnitudes have been determined on the basis of Almirall's risk management model and are as follows: Strategic, Operational, Compliance and Reporting.

All financial materiality factors are applied identically for all identified Risks and Opportunities, except for the severity factor. In the case of Opportunities, severity is assessed in the Strategic, Compliance and Reporting magnitudes. For Risks, severity includes an additional assessment of the Operational magnitude. In both cases, the highest rating from among the three or four assessed variables is taken.

In addition, for each Risk and Opportunity, a first binary assessment (YES or NO) is made on its impact along the different stages of the value chain (defined in section 3.2.4). On the other hand, a second qualitative binary assessment (YES or NO) is carried out on the effect of the Risks and Opportunities on different financial magnitudes for Almirall. Based on the CSRD and Almirall's risk management, the following 6 financial magnitudes have been determined: Operational development of the company, financial performance, financial position, cash flow, access to capital and cost of capital.

#### 3.2.8. Assessment of IROs

During the process of assessing IROs, the representativeness of all stakeholders (defined in section 3.2.5) is ensured and the logic behind each of the factors assessed is assured. The assessment is organized by topics and their relevant stakeholder groups to ensure more efficient assessment meetings.

Each stakeholder group preliminarily assesses a specific set of IROs. These preliminary assessments are presented in a focus group meeting, where participants share, discuss and justify their assessments to agree on a consensus score for the factors of each IRO assigned to their group.

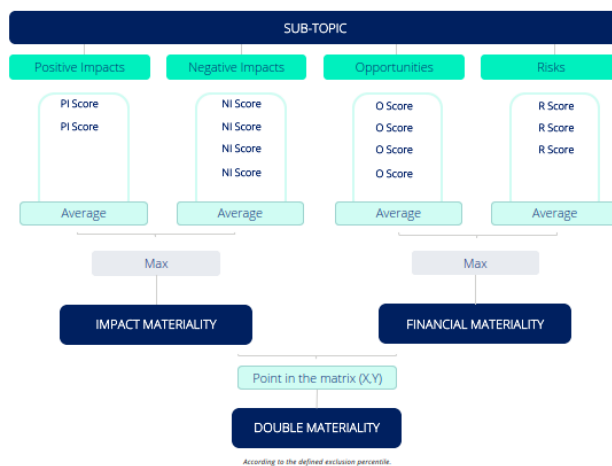
To facilitate the assessment process and unify the reasoning behind the scoring of the different factors of the IROs, a set of assessment criteria has been created in the form of headings. These headings set out the scoring ranges for each factor to be assessed and provide detailed descriptions for each range, minimizing subjectivity.

In general terms, the assessment ranges are on a scale of 1 to 10, in line with Almirall's risk management model. These ranges apply to all factors except the time horizon. For the time horizon, a distinction is made between short (up to 1 year), medium (1 to 5 years) and long term (more than 5 years), to which a weighting factor is assigned (100%, 90% and 80%, respectively). In the case of the evaluations on the value chain and on the different financial magnitudes, the general rule is not followed either, using binary evaluations (YES or NO) equivalent to ones and zeros.

#### 3.2.9. Assessment of double materiality

Once the individual score has been assigned to each IRO, an aggregate score is calculated for each Sub-topic on impact and financial materiality. The process requires a systematic approach to ensure that each Sub-topic receives an accurate score, reflecting its relevance in terms of impact and financial materiality, and a series of specific steps are followed to ensure consistency and accuracy in the assessment.

As mentioned above, each of the 255 identified IROs is assigned to one of the Sub-topics defined by the CSRD. This relationship enables the scores of the IROs for each Sub-topic to be aggregated, thus obtaining a score for impact materiality and financial materiality, as shown in the diagram below:





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This process is based on averaging the scores of all Positive Impacts, Negative Impacts, Opportunities and Risks per Sub-topic, resulting in four individual scores for each Sub-topic. The highest score between the averages of Positive Impacts and Negative Impacts is selected as the final impact materiality score for each Sub-topic. Similarly, the highest score is selected from the averages of Opportunities and Risks as the final financial materiality score for each Sub-topic.

### 3.2.10. Results

When the final results are obtained, they are examined from various perspectives to ensure a holistic view of Double Materiality. This analysis allows conclusions to be drawn that are more in line with Almirall's reality.

First, a comparison is made between the Double Materiality results of the previous period and those of the current year. The addition of material Sub-topics compared to the previous financial year is based on the acquisition of more clarifying evidence and a more in-depth identification and assessment of the IROs. Improvements in the details, democratization of the assessment process and streamlining of the qualitative assessments are key improvements compared to the 2023 financial year.

Secondly, the material sub-topics are analyzed from a more holistic perspective. The various stages of the assessment process consider the current and anticipated effects of material IROs on the business model, value chain, strategy and decision-making. This approach allows for a multi-dimensional assessment and understanding of how the company has responded or plans to respond to these effects. As a result, the depth of the Double Materiality analysis performed makes it possible to measure the resilience of the strategy and business model in terms of the ability to address material Impacts and Risks and to capitalize on material Opportunities.

The Double Materiality assessment for each of the sub-topics is detailed below:

SUB-TOPIC	MATERIALITY
Climate Change Adaptation	Impact and financial materiality
Climate Change Mitigation	Impact and financial materiality
Energy	Impact and financial materiality
Air Pollution	Impact Materiality
Water Pollution	Impact and financial materiality
Pollution of Soil	Financial Materiality
Contamination of Living Organisms and Food Resources	Non Material
Substances of concern	Non Material
Substances of very high concern	Non Material
Microplastics	Non Material
Water	Impact and financial materiality
Marine Resources	Non Material
Direct Impact Drivers of Biodiversity Loss	Non Material

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SUB-TOPIC	MATERIALITY
Impacts on State of Species	Non Material
Impacts on the Extent and Condition of Ecosystems	Impact Materiality
Impacts and Dependencies on Ecosystem Services	Non Material
Resources inflows, including resource use	Financial Materiality
Resource outflows related to products and services	Impact Materiality
Waste	Impact Materiality
Working conditions	Impact and financial materiality
Equal Treatment and Opportunities for All	Impact and financial materiality
Other work-related rights	Impact and financial materiality
Working conditions	Financial Materiality
Equal Treatment and Opportunities for All	Non Material
Other work-related rights	Non Material
Communities' Economic, Social and Cultural Rights	Non Material
Communities' Civil and Political Rights	Non Material
Rights of Indigenous Peoples	Non Material
Information-Related Impacts on Consumers or End-Users	Impact and financial materiality
Personal Safety of Consumers or End-Users	Impact and financial materiality
Social Inclusion of Consumers or End-Users	Impact and financial materiality
Corporate Culture	Impact and financial materiality
Whistleblower Protection	Impact and financial materiality
Animal welfare	Financial Materiality
Political Engagement and Lobbying Activities	Non Material
Management of Relationships with Suppliers including Payment Practices	Non Material

SUB-TOPIC	MATERIALITY
Corruption and Bribery	Impact and financial materiality

### 3.2.11. Previous year's results

It is worth noting that in the previous financial year, the Double analysis was carried out on an aggregated basis, that is, at the level of topics, and not at the higher level of granularity applied this year, i.e., the sub-topic level. Sector-specific issues were also included. Therefore, this year we have carried out a mapping between the topics analyzed by Almirall and those officially established by the ESRS, e.g., Pharmacovigilance, which has been assigned to the sub-topic of Personal Safety of Consumers or End-Users.

As for the results of the previous year's Double Materiality analysis, all of the identified material issues remain relevant this year. The main difference is the incorporation of new material topics, thanks to the increased granularity of the analysis. These new topics include issues related to pollution, water, biodiversity, circular economy, workers in the value chain, social inclusion of end-users, whistleblower protection and animal welfare.

## 4. Environment

### 4.1. Environmental management

Almirall is committed to sustainable development, efficient management of natural resources and pollution prevention. Achieving its goals is as important as the way in which it does so. Its commitment to society includes an environmental policy that guarantees the responsible use of resources, working towards a more sustainable planet.

#### 4.1.1. Occupational Health, Safety and Environment Policy

Almirall has an Occupational Health, Safety and Environment Policy approved in October 2024, which establishes occupational risk prevention and environmental protection, including energy performance, as priority and strategic objectives. The basic principles are:

- The effective management of the occupational health, safety and well-being of workers, as well as environmental protection, including the prevention of pollution, promoting its integration into Almirall's daily work processes.
- The elimination of hazards and reduction of risks to occupational health and safety.
- The efficient and sustainable management of resources, use of renewable energies, and strategies for mitigating and adapting to climate change, through programs to reduce greenhouse gas emissions in line with the climate goal of 1.5%.
- Support for the procurement of energy efficiency products and services that impact energy performance, as well as design activities to improve energy performance.
- The promotion of actions for water protection and management, the circular economy and the protection of nature.
- To provide the organization with environmental, occupational health and safety management systems, as well as strive to continuously improve its performance, complying with the applicable legal requirements and with other requirements to which Almirall voluntarily subscribes.
- Establishing a wellness plan that holistically addresses the physical and mental well-being of people who work in the organization. Almirall is committed to providing safe working conditions and promoting healthy lifestyles and habits both at home and at work.
- Integrating occupational health, safety and environmental protection into the different levels, processes and standards of the organization. All workers, and any relevant third parties, must receive information and training commensurate with their position and/or duties.
- Consultation and involvement of workers and their representatives on issues deemed relevant or required.
- Ensuring that the necessary information on Health, Safety and Environment (HSE) is available through specific manuals and/or standard operating procedures, which shall be maintained and periodically

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updated as necessary. Almirall must allocate the appropriate resources to support the effective implementation and continuous improvement of the HSE system and plan the use thereof appropriately.

- Establishing regular programs and actions to achieve the objectives in accordance with the applicable regulations, with Almirall's sustainability strategy, and with the risks and opportunities identified in terms of occupational risk prevention and environmental protection.

Respect for the environment is an objective of the company as a whole, and therefore responsibility for its achievement is shared by all Almirall's employees, regardless of their level or role. Efforts in this area extend throughout the Group's value chain.

#### 4.1.2. Almirall's integrated management system

From an organizational point of view, Almirall has an Environment Team, which reports to the Global Sustainability Executive Director, who, in turn, reports to the Chief People & Culture Officer. This team has three full-time staff members and is complemented in the different areas and work centers by the participation of other collaborators with specific functions assigned to environmental management on with part-time basis.

Almirall has an integrated occupational health and safety, environmental and energy management system. In 2022, Almirall successfully passed the TÜV Rheinland certification audit of the integrated management system, in accordance with international standards ISO 45001:2018, ISO 14001:2015 and ISO 50001:2018, at all its centers in Spain and Germany. In 2024, the second follow-up audit by TÜV Rheinland was conducted with a result of 6 minor non-conformities and 1 major non-conformity for the three standards. The major non-conformity relates to the effective review of actions resulting from the non-conformities.

Almirall has held ISO 14001 certification since 2004 and obtained the certification according to the most recent version of the standard (ISO 14001:2015) in 2018.

Likewise, in relation to energy management, after becoming, in 2013, one of the first pharmaceutical laboratories to obtain ISO 50001:2011 certification, in 2019 the system was adapted and certified in accordance with the new ISO 50001:2018 standard, revalidating the effectiveness of the system put in place.



The scope of the prevention and environmental management system, including energy performance, is as shown on the table below:

Country	Type of center	Center	Activity	ISO 45001	ISO 14001	ISO 50001
Spain	Offices	Headquarters	R&D activities, manufacture of active ingredients, manufacture and marketing of pharmaceutical specialties	X	X	X
		Sales network	Marketing of pharmaceutical specialties	X	-	-
	R&D Center	Sant Feliu	R&D activities	X	X	X
	Chemical Plant	Sant Celoni	Manufacture of active ingredients	X	X	X
	Chemical Plant	Sant Andreu	Manufacture of active ingredients	X	X	X
	Pharmaceutical Plant	Sant Andreu	Manufacture of pharmaceutical specialties	X	X	X
Germany	Pharmaceutical Plant	Reinbek	Manufacture of pharmaceutical specialties	X	X	X

Table 14 Scope of the system for prevention and environmental management, including energy management

The scope of the data reported in sections 4.5 "Water" and 4.7 "Resource use and circular economy" includes the environmental information of Almirall's production centers, the R&D center in Sant Feliu and the headquarters in Barcelona, excluding the international commercial subsidiaries. The excluded scope corresponds to environmental aspects related to the activity in rented premises where Almirall has no

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operational control over them and whose environmental impact is considered insignificant with respect to the rest of Almirall's activity.

In addition to the ISO certifications, Almirall's Barcelona headquarters has attained the Leadership in Energy and Environmental Design (LEED) certification for the Operation and Maintenance (O+M) of existing buildings in the Gold category. This certification values energy and water savings, the minimization of greenhouse gases, the use of environmentally friendly materials and resources, the environmental quality of the interior spaces, as well as the use of sustainable means of transportation by the occupants. In addition, a major project to eliminate greenhouse gas emissions associated with the site's energy sources and to improve energy efficiency, including the replacement of all of the building's natural gas appliances, has been underway since the beginning of 2023. Since March 2024, this headquarter's energy consumption has been exclusively electrical and comes from renewable sources, making it Almirall's first carbon neutral site. On the other hand, the canteen services in Almirall's centers in Spain have obtained certification as sustainable restaurants. The standards necessary to obtain this certificate include seven essential requirements: local purchasing and logistics with low environmental impact, nutritional control of food, waste recycling and revaluation, responsible consumption of resources, reduction of food waste, training and awareness of stakeholders and corporate social responsibility.

Almirall currently has a non-mandatory environmental risk insurance policy for its sites in Spain, with a cover of 10 million euros.

Almirall was not subject to any fines or sanctions for non-compliance with environmental regulations in 2024.

#### 4.1.3. Due Diligence Processes and Procedures

Almirall has established, implemented and updated various due diligence processes and procedures to ensure that the prevention and environmental management system is always adequate and effective. In the following sections, we make reference to each of the environmental management issues. Furthermore, details of the Sustainable Procurement Program are set out in section 2.3 "Sustainable supply chain", and range from the assessment of the environmental impact of the supply of critical materials with the "High-Risk Materials" project, the establishment of policies and processes, as well as sustainability clauses in contracts with suppliers, supplier approval systems and audits.

#### Supplier engagement program

Reducing the carbon footprint in value chain emissions (upstream/downstream - Scope 3) is one of the priorities of the sustainable procurement program since its first calculation in 2022, which corresponds to October 2021-September 2022.

It is for this reason that Almirall launched the Net Zero project, which has evolved, with respect to Scope 3, into a Supplier Engagement Program with those suppliers that have a high impact on our carbon footprint. Its objectives are to:

- Know the primary greenhouse gas emissions data of our suppliers in order to calculate their impact on our Scope 3 and be able to measure their progress.
- Communicate our decarbonization ambition in scope 3 (28% reduction in the absolute value of tons of CO<sub>2</sub> in 2030 compared to the base year 2019 and "net zero" in 2050) and get our suppliers to align with us on these objectives.
- Train those suppliers with a lower level of maturity in greenhouse gas emissions management, for which specific materials have been developed and are available online.
- Identify specific opportunities for improvement and positive impact on Almirall's footprint.

Since 2022 we have a new module on the platform of our audit provider that allows us to have more information on the level of maturity of our supplier base in the management of greenhouse gas emissions, where we capture part of the information necessary to adjust our carbon footprint and identify areas for improvement to move towards more optimal levels, prioritizing action plans and training actions with those suppliers that have a greater impact on our carbon footprint in order to reduce it to Almirall's targets for 2030 and 2050.

To be able to measure and monitor the development of the Supplier Engagement Program, the following Carbon Scorecard objective was set.

Name of the KPI	Description of the KPI	KPI target/year	% reached in 2024
Suppliers with a valid Carbon Scorecard in ESG audits(*)	% of greenhouse gas emissions from suppliers with a valid Ecovadis carbon scorecard impacting our Scope 3, Categories 1 & 2 carbon footprint	2024: 55% 2025: 58%	57%

Table 15 KPIs Supplier Engagement Program 2024-2026

(\*) The reference to "results" refers to supplier evaluations that are 2 years old or less

Similarly, during 2024, we had been working to define an optimal level of "Carbon Performance" (management and performance concerning greenhouse gas emissions). In this regard, the attainment of this optimum level is, in Almirall's opinion, linked to the following actions by the suppliers included in Scope 3, categories 1 and 2, with Almirall giving special priority to working with those suppliers that have a greater weight in this scope:

- Reporting: acceptance of the supplier code of conduct, reporting of Scope 1 and 2 emissions data, and reporting of Scope 3 (upstream and downstream) emissions at an aggregated level.
- Establishment of reduction targets in Scope 1, 2 and 3.
- Verification of emissions calculation by a third party (auditor) and the setting of targets validated by SBTi.
- Provision of emissions data at product level.

### **Energize**

This year, Almirall has taken a significant step towards sustainability by becoming a sponsor of the Energize program. The aim of this program is to increase the adoption of renewable electricity in the pharmaceutical supply chain. Through this initiative, Almirall not only reaffirms its commitment to reducing its carbon footprint, but also supports its suppliers in the transition to more sustainable energy sources.

The *Energize* program offers Almirall's suppliers the opportunity to participate in a series of educational sessions on renewable energy and provides them with tools for procuring renewable electricity. The program also facilitates the creation of cohorts of renewable energy purchasers, enabling suppliers to join collective efforts to reduce their greenhouse gas emissions. The criteria for the inclusion of suppliers in the program follows the same criteria used in our online audit program, which are shown in point 2.3.3 "Levers and tools for sustainable supply chain management". Since joining the program, Almirall has worked closely with Schneider Electric (the company that designed the program) to ensure an effective implementation and active engagement of its suppliers. To date, numerous suppliers have registered in the program, and training sessions have been held for Almirall's category managers.

This effort is in addition to Almirall's other sustainability initiatives, such as the reduction of energy consumption and the procurement of green electricity with a guarantee of origin.

With this initiative, Almirall not only seeks to reduce its own carbon footprint, but also to lead by example and encourage sustainable practices throughout the pharmaceutical industry.

## **4.2. European Taxonomy**

The European Commission adopted a comprehensive package of measures to help improve the flow of money to sustainable activities throughout the European Union. By enabling investments to be redirected towards more sustainable technologies and businesses, these measures will contribute to making Europe climate neutral by 2050. One of these measures is the Taxonomy Regulation, Regulation (EU) 2020/852, which was followed by two Delegated Regulations complementing the previous one. On the one hand, Delegated Regulation 2021/2139 of 4 June 2021, which established a list of economic activities that contribute substantially to the objectives of climate change mitigation and adaptation and do not cause significant damage to other environmental objectives. On the other hand, the Delegated Regulation of 6 July 2021 described the different key indicators to be reported by companies subject to the obligation to publish Non-Financial Statements in accordance with Articles 19 bis and 29 bis of Directive 2013/34. Thanks to these, a system of classification of sustainable economic activities was set up, where what is and what is not sustainable is defined on the basis of objective criteria. In this way, a common language is built for investors and companies that drives, on the one hand, investments towards more sustainable technologies and companies with a substantial positive impact on climate and the environment, and on the other hand, the fulfilment of the EU's climate goals, the Paris Agreement and the UN Sustainable Development Goals.

Ultimately, the Taxonomy establishes a set of harmonized criteria for determining whether an activity is sustainable, taking into account existing market practices and the initiatives and advice of a group of technical experts, thus laying the groundwork for the development of a set of standards and labels for sustainable financial products.

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The European taxonomy established six environmental objectives to identify environmentally sustainable economic activities:

- i. Climate change mitigation.
- ii. Adaptation to climate change.
- iii. Sustainable use and protection of water and marine resources.
- iv. Transition to a circular economy.
- v. Pollution prevention and control.
- vi. Protection and restoration of biodiversity and ecosystems.

The Taxonomy establishes two criteria for analysis:

- **Eligible activities:** an economic activity carried out by a company is eligible as long as it complies with the description of one of the activities listed in the annexes of Delegated Regulation 2021/2139 of 4 June 2021. Eligibility has a nature of potentiality, i.e., an eligible activity is one that could become green according to the European Taxonomy.
- **Aligned activities:** the alignment of an activity indicates its substantial contribution to one or more of the environmental objectives defined by the European Commission. This concept is the result of compliance not only with the requirements in the activity definitions, but also with the technical criteria of substantial contribution (mitigation and adaptation), the principle of do no significant harm (DNSH) to the other objectives (water protection, circular economy, pollution prevention and biodiversity) and minimum social safeguards.

The Regulation also establishes that three economic indicators must be reported: the percentage that eligible or aligned activities represent of total net sales, CAPEX and OPEX.

As of 1 January 2025 (for the 2024 reference period), all activities eligible under the six environmental objectives, as well as the alignment of all activities, must be reported.

As of 1 January 2024 (for the reference period 2023) it was necessary to report all activities eligible under the six environmental objectives, but only the alignment of the first two, since the delegated acts for the remaining 4 were published in 2023.

For this reason, certain figures are not available for some years in the KPI tables for the different activities at the end of this section.

#### 4.2.1. Adoption of the European Taxonomy

As a result of the analysis carried out by Almirall's Management with the different areas of responsibility of the Group, the following eligible activities have been identified:

Environmental objective	Eligible activity
Climate change mitigation.	7.6. Installation, maintenance and repair of renewable energy technologies
Pollution prevention and control.	1.1. Manufacture of active pharmaceutical ingredients (APIs) or active substances
Pollution prevention and control.	1.2. Drug manufacturing

Table 16 Eligible activities at Almirall

- **Installation, maintenance and repair of renewable energy technologies:** this activity mainly concerns the installation of photovoltaic panels at several of the Group's work centers, as described in large part in section 2 "Environmental management" of this report and in Note 29 to the Group's consolidated notes to the annual accounts. This activity only has OPEX and CAPEX KPIs, since the pharmaceutical sector is not identified as a critical sector in relation to greenhouse gas emissions.
- **Manufacture of active pharmaceutical ingredients (API) or active substances:** this activity is directly linked to the Group's own core business. However, the chemical production carried out by the Group is mainly for internal use in the manufacture of pharmaceutical specialties, so the percentage of net sales is not significant. As mentioned in the following sections, the Group has two chemical plants, both located in Spain, in Sant Andreu de la Barca and Sant Celoni, both in the province of Barcelona.
- **Manufacture of drugs:** this activity, like the previous one, is linked to the Group's core activity, since the largest percentage of net sales corresponds to the marketing of pharmaceutical specialties. The

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Group has two pharmaceutical plants, one located in Spain (Sant Andreu de la Barca) and the other in Germany (Reinbek), but it should be noted that part of the products are manufactured by third parties.

For the rest of the environmental objectives, no eligible activities have been identified.

The analysis of the alignment of activities has been carried out considering the information provided by different Group departments, located in the different business areas. Following the process of identification of eligible activities, the following have been analyzed:

- Technical criteria for substantial contribution
- Doing no significant harm to other environmental objectives (DNSH).
- Minimum social safeguards.

In accordance with the annexes of the Delegated Regulation, for each KPI linked to an eligible activity during the 2024 financial year, compliance with the requirements ("technical selection criteria") set out in these annexes for each activity has been analyzed. In this regard:

- For activity "7.6. Installation, maintenance and repair of renewable energy technologies" was considered non-aligned as it could not adequately trace related supplier information and had a qualitative physical climate risk analysis available, but lacked the quantitative part. Nevertheless, for the purposes of future investments in this activity or in other activities that may arise in the future, the Group is working to identify those key aspects that will ensure that eligible activities can also be considered aligned.
- For activities "1.1. Manufacture of active pharmaceutical ingredients (APIs) or active substances" and "1.2. Manufacture of medicinal products, the Group has also considered that they do not meet the technical criteria for alignment as these are very stringent, over and above the requirements of the ISO and GMP certifications held by the Group's production facilities.

The Minimum Social Safeguards are set out in Article 18 of the delegated Regulation 2020/852, which states:

1. The minimum guarantees referred to in Article 3(c) shall be the procedures applied by an enterprise engaged in an economic activity to ensure compliance with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight core conventions mentioned in the International Labor Organization Declaration on Fundamental Principles and Rights at Work and the International Bill of Human Rights.
2. When implementing the procedures referred to in paragraph 1 of this Article, companies shall comply with the principle of 'no significant harm' referred to in point 17 of Article 2 of Regulation (EU) 2019/2088."

In this respect, the requirements are grouped under four main thematic blocks: Human Rights, Corruption, Taxation and Fair Competition.

- Human Rights: Almirall is firmly committed to protecting Human Rights and strives to ensure that the activities carried out within its area of influence do not violate Human Rights. To this end, it has various tools and mechanisms in place to comply with this commitment (for further details see sections 2.2.3 "Business conduct policies" and 5.2.17 "Human Rights Incidents and Complaints").
- Corruption: Almirall is committed to a "zero tolerance" policy on bribery and corruption, rejecting any action that includes these practices as a means of obtaining its private interests (for further details see section 2.2.4 "Prevention and detection of corruption or bribery").
- Taxation: Almirall is committed to complying with all tax requirements and applying best tax practices, always communicating its activities transparently and complying with its tax obligations in a responsible and efficient manner (for further details see section 2.4.3 "Tax contribution").
- Fair competition: Almirall is committed to long-term success through fair competition, and without engaging in practices that affect the free market, as set out in its own Code of Ethics. For this reason, they promote ethical and respectful business management in accordance with competition laws, and must avoid any unfair practice that involves taking advantage of unfair advantages or that may affect free competition.

#### 4.2.2. Calculation of KPIs

To facilitate the understanding of the figures reported in this report and their consistency with the Notes to the consolidated annual accounts, below is a breakdown of what is included in the denominator of each KPI, as well as the calculation of each of the %.



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The following tables detail the composition of the OPEX and CAPEX denominators, which are common to the three eligible activities:

Thousands of euros	Reference	2023	2024
(+) R&D activities	Note 22	66,908	79,005
(+) Leases and fees	Note 22	39,672	54,949
(+) Repairs and maintenance	Note 22	23,225	22,002
(-) Royalties	Note 22	-25,913	-39,755
<b>Total taxonomic OPEX</b>		<b>103,892</b>	<b>116,201</b>

Thousands of euros	Reference	2023	2024
(+) Additions to intangible assets	Note 9	211,886	99,778
(+) Additions to rights of use	Note 10	10,353	8,173
(+) Additions to property, plant and equipment	Note 11	33,499	29,835
<b>Total CAPEX</b>		<b>255,738</b>	<b>137,786</b>

Table 17 Taxonomic OpEx and Group CapEx

The net sales figure coincides directly with that of the consolidated profit and loss statement, but it is only used for the activities of “Manufacture of active pharmaceutical ingredients (API) or active substances” and “Manufacture of drugs”.

The data for calculating the KPIs are extracted from the Group's accounting records, with the additional details that the analytical system makes possible, of separating the information by areas of responsibility, type of product or geographical area, among others. The information presented is prepared by applying consolidation criteria and under IFRS and therefore does not include transactions between the various legal entities that make up the Almirall Group. The % of eligibility for each of the activities is detailed below:

Installation, maintenance and repair of renewable energy technologies (Thousands of euros)	2023	2024
Turnover from the activity (a)	0	0
Turnover (b)	894,516	985,721
<b>KPI Revenue (a) / (b)</b>	<b>0.00%</b>	<b>0.00%</b>
CAPEX of the activity (c)	1,360	891
CAPEX (d)	255,738	137,786
<b>KPI CAPEX (c) / (d)</b>	<b>0.53%</b>	<b>0.65%</b>
OPEX of the activity (e)	31	6
Taxonomic OPEX (f)	103,892	116,201
<b>KPI OPEX (e) / (f)</b>	<b>0.03%</b>	<b>0.01%</b>

Table 18 KPIs for eligible activity 1

Manufacture of active pharmaceutical ingredients (APIs) or active substances (Thousands of euros)	2023	2024
Turnover from the activity (a)	6,686	10,266
Turnover (b)	894,516	985,721
<b>KPI Revenue (a) / (b)</b>	<b>0.75%</b>	<b>1.04%</b>
CAPEX of the activity (c)	4,832	2,502
CAPEX (d)	255,738	137,786
<b>KPI CAPEX (c) / (d)</b>	<b>1.89%</b>	<b>1.82%</b>
OPEX of the activity (e)	5,482	3,553
Taxonomic OPEX (f)	103,892	116,201
<b>KPI OPEX (e) / (f)</b>	<b>5.28%</b>	<b>3.06%</b>

Table 19 KPIs for eligible activity 2

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Drug manufacturing (Thousands of euros)	2023	2024
Turnover from the activity (a)	590,912	715,023
Turnover (b)	894,516	985,721
<b>KPI Revenue (a) / (b)</b>	<b>66.06%</b>	<b>72.54%</b>
CAPEX of the activity (c)	18,618	21,183
CAPEX (d)	255,738	137,786
<b>KPI CAPEX (c) / (d)</b>	<b>7.28%</b>	<b>15.37%</b>
OPEX of the activity (e)	13,411	14,590
Taxonomic OPEX (f)	103,892	116,201
<b>KPI OPEX (e) / (f)</b>	<b>12.91%</b>	<b>12.56%</b>

Table 20 KPIs for eligible activity 3

The standard tables required by the European Commission regulation can be found at 7.2 “Tables of indicators of economic activities that comply with EU taxonomy”.

### 4.3. Climate Change

In terms of climate change risk management and strategy, Almirall is aligned with the TCFD (Task Force on Climate-related Financial Disclosures) guidelines. The sections below explain how this has been approached in each of its 4 areas: governance, strategy, risk management and metrics and targets.

#### 4.3.1. Governance

Corporate governance plays a key role in Almirall’s climate strategy, fulfilling responsibilities towards all stakeholders. Sustainability principles are formally integrated into the company’s strategic objectives, reflecting a strong commitment that extends from Senior Management to the Board of Directors, which approves and validates the sustainability strategy, the key performance indicators (KPIs) and their annualized targets.

The responsibilities of corporate governance in the area of sustainability, including climate change management, are detailed in section 2.1 “Corporate Governance” of this report. In 2024, a new long-term incentive model for senior management, called the Performance Shares Plan (PSP), was set up, aligning its objectives with the corporate strategic objectives. This plan includes for the first time targets related to sustainability and consists of CO2 emission reduction targets. The weight of the objectives of these plans linked to climate change represents 7.5% of the total. For more details on incentives, including those of the Management Board, see section 3.1.4 “Sustainability and ESG goals; initiatives and projects”.

#### 4.3.2. Impact, Risk and Opportunity Management

Almirall integrates climate change risks and opportunities into its corporate risk management process. The company is committed to identifying, assessing and monitoring these risks and opportunities by means of an integrated, multidisciplinary process. For more details on the methodology used in the analysis of Double Materiality and the identification of Impacts, Risks and Opportunities, see section 3.2 “Double materiality assessment” of this report. In 2024, Almirall’s Double Materiality analysis made it possible to identify and update the key climate impacts, risks and opportunities in its value chain, covering physical and transition risks both in its operations and along the value chain; detailed below.

The Governance Committee is responsible for the supervision and control of the risk management system, as well as for the control and monitoring of the implementation of action plans to mitigate the risks. The Executive Director Internal Audit reports the relevant risks of the company to the Audit Committee and the Board of Directors. The company’s risk map is updated at least annually. The CEO and the members of the management committee are responsible for the execution and implementation of the annual risk map as well as the risk mitigation action plans.

Almirall has conducted a preliminary quantitative analysis of the most significant risks and opportunities of climate change, estimating the financial implications for the business. This analysis includes:

- Transition risks associated with the shift to a low-carbon economy, including regulatory, technological and reputational risks.
- Physical risks of climate change, which can be either severe events occurring in a short period of time (acute) or changes in long-term weather patterns (chronic).

The following time frames have also been determined:

- Transition risks and opportunities: 2025-2030 (short to medium term) and 2040 (long term). These time horizons have been chosen because transition risks are more likely to impact the company's business in the short to medium term.
- Physical risks: 2030 (medium term) and 2040 (long term). These longer time horizons have been chosen in order to consider climate-related inertia, maintaining a time frame that is relevant for Almirall for both existing assets and future investments.

Almirall is currently conducting a quantitative risk analysis that will make it possible to meet the deadlines set forth in the CSRD, using the scenario analysis methodology. For the physical scenarios, Almirall has considered the so-called Representative Concentration Trajectories (RCP) 4.5 and RCP 8.5 to explore physical risks such as floods, water shortages, extreme weather events or temperature increases. To measure transition risks, Almirall has considered adopting two scenarios; a scenario aligned with current global SPS commitments (between 2.7 and 3.3°C) and a low-carbon scenario, namely the SDS sustainable development scenario (1.5°C).

In 2024, Almirall's Double Materiality analysis made it possible to identify and update the key climate impacts, risks and opportunities in its value chain, covering physical and transition risks both in its operations and along the value chain. The most relevant risks, opportunities and impacts have been highlighted.

### **Transition risks**

- **Regulatory risks:** Almirall may be exposed to direct and indirect risks arising from the challenges of aligning with the EU's Net Zero carbon reduction targets and complying with increasingly stringent climate change regulations. These challenges could increase transitional costs, which include both operational and capital investments. To ensure compliance with regulatory standards, Almirall may need to restructure its current products.
- **Market and technological risks:** Failure to adapt in time to market demands and more sustainable practices in response to climate change could result in a loss of market share, with a consequent decrease in revenues. This is because consumers are increasingly inclined towards sustainable products and services, and Almirall's failure to respond to competition in this area could negatively affect consumer perception.
- **Reputational risks:** Non-compliance with environmental regulations, especially with regard to climate change, can severely damage the company's reputation in the short and medium term. Failure to comply with environmental regulations could result in a significant loss of business opportunities due to the damage to Almirall's reputation and image.

### **Transition opportunities**

- **Regulatory opportunities:** Optimization of energy use and increase in self-generated renewable energy at Almirall through the implementation of energy efficiency actions and the installation of photovoltaic plants. These initiatives not only reduce energy costs and dependence on the conventional electricity grid, but can also generate additional revenue from the sale of surplus energy. Adaptation to the new energy regulations offers the possibility of identifying innovative technological solutions, improving efficiency in production processes and R&D centers, and developing products with a lower carbon footprint, whilst complying with regulations on energy consumption and efficiency.
- **Market opportunities:** Better positioning and differentiation of Almirall from its competitors thanks to the execution of effective strategies against climate change and the implementation of sustainable practices. This includes enhancing reputation and transparency through the effective communication of environmental practices and emissions savings, strengthening both the company's image and its competitive advantage in the market.
- **Reputational opportunities:** Promoting dialogue on environmental, social and governance issues so as to raise stakeholder awareness of sustainable practices and strategies for addressing climate risks, taking the operational and regulatory complexity of the sector into consideration. This initiative may improve the perception of Almirall in terms of sustainability and strengthen the culture of environmental protection amongst its workforce.
- **Funding opportunities:** Increased funding from ESG investors and enhancement of the brand's reputation, thanks to Almirall's strong performance in sustainability, climate change and certifications. This includes securing Next Gen EU funding to accelerate energy efficiency and industrial digitalization

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projects, strengthening the company's competitiveness and its image amongst investors and shareholders.

### **Physical risks**

- **Floods and droughts:** Increased frequency and severity of river flooding, together with prolonged episodes of heavy rainfall, could cause disruptions to manufacturing and damage to Almirall's production facilities. Droughts can also lead to water and energy shortages, increasing the acquisition costs for water and raw materials. The localities of Barcelona and Sant Celoni in Spain are particularly vulnerable to these risks, with it being forecast for them to worsen in the long term.
- **Extreme weather events:** Disruption to Almirall's infrastructure and operations due to extreme weather events such as cyclones, hurricanes and typhoons. These events could increase the costs of procuring material resources (active ingredients, packaging, machinery, etc.), raise overheads and cause damage to logistics centers, negatively impacting the efficiency of the company.

### **Physical opportunities**

- **Adaptation and resilience:** Strengthening Almirall's adaptation and resilience to climate change by identifying opportunities arising from changes in ecosystems. This includes reducing vulnerability through geographical diversification and reducing costs through crisis management systems, security protocols and contingency plans.
- **Insurance policies:** Reduction of Almirall's exposure to large investments for climate change-related damages by working with insurers to develop customized policies that cover specific risks of extreme weather events and to mitigate significant increases in premiums.

### **Negative Impacts**

- **Operational and regulatory constraints:** The structure of Almirall's business model imposes restrictions that make it difficult for the company, its suppliers and third parties to adapt to climate change. These constraints include geographical barriers that complicate the relocation of activities and the integration of circular life cycles, with eco-design considerations constrained by the pharmaceutical sector's own regulations, which can limit the ability to implement adaptation strategies.
- **Generation of emissions and energy consumption:** Almirall's operations, including research, development, production and transport processes, are highly energy intensive, generating Scope 1, 2 and 3 greenhouse gas (GHG) emissions. These emissions, derived both from the company's own activities and those carried out along its value chain, increase the company's carbon footprint and aggravate the impacts on climate change.

### **Positive impacts**

- **Climate adaptation and decarbonization:** Almirall encourages the installation of photovoltaic plants at its production centers and is decarbonizing its fleet of vehicles, infrastructure and machinery, replacing fossil fuels with renewable energy sources to reduce its carbon footprint.
- **Energy efficiency and renewable energy:** Almirall is improving energy efficiency and increasing the use of renewable sources in its operations, reducing greenhouse gas emissions and supporting the transition to a more sustainable economy.

### **Climate resilience analysis**

Almirall plans to conduct an analysis of its climate resilience once the analysis of the financial impact of its risks has been completed. It should be noted that the main physical risks identified are associated with interruptions to the supply of products or raw materials. This risk is identified in the risk mitigation plan for strategic products which, among other actions, contemplates having a dual source of supply for all products identified as critical.

#### **4.3.3. Transition plan to mitigate the impact of climate change**

Almirall's transition plan includes past, present and future actions to ensure that its strategy, business model and financial planning are compatible with the transition to a sustainable economy, the global warming limit of 1.5°C and achieving climate neutrality by 2050.

With regards to the information that the European Sustainability Reporting Standards (ESRS) require about the transition plan to mitigate the impact of climate change, it should be pointed out that:

- Almirall has approved and validated science-based targets with the Science-Based Target Initiative aligned with the Paris Agreement and is committed to achieving net zero emissions by 2050, as

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explained in section 4.3.5 "Actions and resources in relation to climate change policies and Targets related to climate change mitigation and adaptation" of this report.

- Almirall's main strategic lines of action to carry out the transition are described in section 3.1.4 "Sustainability and ESG goals", while the actions taken in 2024 can be found in section 4.3.5.
- Almirall's climate strategy is integrated into the company's financial planning in the short and medium term. Almirall prepares and maintains an annual budget for the current year and a five-year forecast of its operating expenses (opex) and investments (capex). Operating expenses in 2024 include the purchase of electricity from renewable sources, the sustainable purchasing program, which has incorporated an evaluation of suppliers' performance with respect to their management of GHG emissions, the Energize program for suppliers, the flexible compensation plan that encourages the use of public transport, and the grant to purchase hybrid or electric vehicles for all Almirall workers in Spain. The investments made in 2024 related to climate change mitigation correspond mainly to energy efficiency projects and the extension of photovoltaic panel installations at the Sant Andreu de la Barca and Reinbek centers. Thus, according to the European taxonomy, the activity of "Installation, maintenance and repair of renewable energy technologies" has been identified as eligible for the company. For more details, see section 4.2.1 "Adoption of the European Taxonomy".
- No locked-in GHG emissions have been identified in the company's assets that would prevent it from achieving its 2030 GHG emission reduction targets and reaching net zero emissions by 2050.
- Almirall's business is not excluded from the "EU climate transition benchmarks" and the "EU benchmarks harmonized with the Paris Agreement" in accordance with Article 12 of Commission Delegated Regulation (EU) 2020/1818.
- The emission reduction targets, as well as the initiatives that make up the Climate Transition Plan, have been approved by the Management Board, validated by the Audit Committee and subsequently approved by the Board of Directors (see section 2.1 "Corporate Governance").
- The progress of the Transition Plan is monitored at a high level with the indicators defined in the Sustainability Dashboard (see section 3.1.4), and the breakdown of the evolution of greenhouse gas emissions (for more details see section 4.3.7 "Scope 1, 2 and 3 emissions").

#### **4.3.4. Policies related to climate change mitigation and adaptation**

Almirall has various policies in place to address the impacts, risks and opportunities related to climate change mitigation and adaptation. The company's Sustainability Policy and the Corporate Health, Safety and Environment Policy establish the basic principles and commitments of the company with regards to the pursuit of sustainable development and the prevention of and adaptation to climate change. This is achieved through programs to reduce greenhouse gas emissions, aligned with the 1.5°C climate threshold, efficient and sustainable resource management, the use of renewable energy and support for the procurement of energy-efficient products and services that impact energy efficiency, as well as programs to support design activities that consider improving energy efficiency, amongst others.

The company's programs are in line with its science-based net zero emissions strategy, the United Nations 2030 Sustainable Development Goals (SDGs) of Affordable and Clean Energy (SDG 7) and Climate Action (SDG 13) and the Climate Goals of the Paris Agreement.

These policies apply to all of Almirall's operations, including all of its legal entities and all workers involved in the relevant activity or site. They cover all of the Group's activities and locations, promoting practices that contribute to environmental sustainability along the entire value chain.

The Corporate Sustainability Committee, which reports directly to the Management Board, is responsible for ensuring the integration of these policies in all of the Group's areas. In turn, the CEO must approve the various initiatives and the Global Sustainability Executive Director is responsible for overseeing sustainability issues in coordination with the other departments.

The policies were developed taking into account the interests of staff, customers and local communities, ensuring an active participation and transparent communication on environmental and sustainability issues. The policies are available on the company's intranet, ensuring that stakeholders have access to information on how the company is addressing climate change challenges.

This approach to policies reflects Almirall's ongoing commitment to environmental sustainability practices and highlights the company's proactive measures to addressing climate change through a comprehensive and effective policy.

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#### 4.3.5. Actions and resources in relation to climate change policies and Targets related to climate change mitigation and adaptation

Following a GHG emissions reduction in the 2014-2021 period of 39% for Scope 1 and 2 emissions, in 2022 Almirall's Board of Directors approved ambitious GHG emissions reduction targets aligned with the Paris Agreement commitments, which were validated by the Science Based Target initiative (SBTI) in June 2023. The validated short- and long-term science-based targets (SBTs) aligned with a 1.5°C scenario are as follows:

##### **Short-Term Target: 2030**

Almirall is committed to:

- The absolute reduction of 50% of Scope 1 and 2 GHG emissions with respect to the base year 2019.
- Maintain the annual purchase of 100% renewable electricity.
- The absolute reduction of 28% of scope 3 GHG emissions compared to 2019.

For the short-term targets with a time horizon of 2030, an intermediate target has been set to 2025, as indicated in the approved Sustainability Dashboard for the environment. To achieve the targets, a road map and the main strategic lines to be followed have been defined.

##### **Long-term goals: 2050**

Almirall is committed to reducing its absolute scope 1,2 and 3 GHG emissions by 90% by 2050 compared to the base year 2019.

##### **Zero net emissions target**

Almirall is committed to achieving net zero emissions across the value chain by 2050. Almirall is not currently considering the use of carbon credits to meet the short-term target, reserving this option only for achieving net zero emissions.

In addition to these objectives, an intermediate target has been set for 2025, as indicated in the approved Sustainability Dashboard.

In order to achieve the objectives, Almirall has developed a program known internally as Net Zero within the 2030 Act4Impact-Planet strategy, which develops and implements the roadmap of actions necessary to attain the objectives.

In summary, the decarbonization targets and levers are shown below, as well as their estimated quantitative contribution broken down by Scope 1-2 and 3, aligned to our science-based targets. It also includes the capex associated with the projects envisaged for attaining the projects. The amounts of capex associated with climate change mitigation actions are not material to the Group's capex and so for this reason also cannot be reconciled with the Group's Consolidated Financial Statements.

Target reduction goals	2019 (Base year)	2025	2030	2050
Scope 1 and 2 GHG emissions (t CO <sub>2</sub> e)	6,864.6	5,354.4	3,432.3	686.5
Scope 1 and 2 GHG emission reduction ratio (%)	0	≥ 12%	≥ 50%	≥ 90%
Climate change mitigation actions	2019-2021	2023-2025	2026-2028	2029-2030
Energy efficiency and consumption reduction (tCO <sub>2</sub> e)	423.3	347.1	0	0
Fuel substitution (t CO <sub>2</sub> e)	0	0	218.1	0
Electrification in installations (t CO <sub>2</sub> e)	0	1,545.6	857.7	0
Hybridization/Electrification of vehicle fleet (t CO <sub>2</sub> e)	0	0	470.2	509.4
Installed solar photovoltaic power (kWp) at the end of the period	712.8	3,796	3,850	3,850
Percentage of renewable electricity consumed	100%	100%	100%	100%
CAPEX (€ thousand)	Not calculated	10,308	2,526	Not defined

Table 21 Scope 1 and 2 emission reduction targets and actions

For the 2019-21 period the reduction associated with energy efficiency and consumption reduction has been calculated with the actual values of effective reduction, as well as the annual self-generated power from

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photovoltaic panels. Years 2022 and 2023 year have been excluded from this period as it is not representative at the energy level due to the temporary stoppage of production at the Sant Celoni chemical plant.

Emission reductions associated with energy efficiency, fuel substitution and electrification projects in downstream installations are based on the estimated reduction of the projects.

Emission reductions from the vehicle fleet have been estimated based on the policy projection, which estimates a 24% reduction in 2027 and a 50% reduction in 2030. This initiative has no CAPEX associated with it, only OPEX.

The incremental financial CAPEX could not be calculated because of the complexity entailed, but corresponds to the total investment cost.

Target reduction goals	2019 (Base year)	2025	2030	2050
Scope 3 GHG emissions (t CO <sub>2</sub> e)	162,839.7	149,812.5	117,244.6	16,284.0
Scope 3 GHG emission reduction ratio (%)	-	≥ 8%	≥ 28%	≥ 90%

Table 22 Scope 3 emission reduction targets

Climate change mitigation actions	2019-2025	2026-2030
<b>Emissions from goods and services Cat.1</b> (t CO <sub>2</sub> e)	<b>20,942</b>	<b>24,653</b>
<b>Emissions from transport and distribution Cat.4</b> (t CO <sub>2</sub> e)	<b>350</b>	<b>1,638</b>
Replacing air shipments with sea shipments (t CO <sub>2</sub> e)	250	0
Bi-fuel use in road transport (t CO <sub>2</sub> e)	150	0
<b>Emissions from business travel Cat.6</b> (t CO <sub>2</sub> e)	0	6,298
<b>Emissions from employee commuting Cat.7</b> (t CO <sub>2</sub> e)	0	788

Table 23 Scope 3 emission reduction actions

The reduction of emissions from goods and services associated with the 2019-25 period has been calculated as the actual difference between emissions in 2024 vs 2019 and, for the 2026-30 period, as the difference between 2024 up to the target reduction of 2030, as it has not been possible to quantify the impact of the Supplier Engagement Program through concrete actions.

For category 4 transport and distribution, reductions have been calculated in specific actions and the 2026-30 forecast is accounted for as a reduction of the internal target by 2030.

For categories 6 and 7, Business Travel and Employee Commuting respectively, no reduction actions have been accounted for in the 2019-25 period, and therefore the internal reduction target by 2030 is accounted for as a 2026-30 reduction.

Below is a summary of the main initiatives implemented in 2024 associated with the actions:

### Scope 1 and 2 emissions

In relation to Scope 1 and 2 emissions, they are divided into those related to energy and those related to the vehicle fleet. The energy-related initiatives include the following:

- Expansion of the photovoltaic facility at the Sant Andreu pharmaceutical plant (Phase II) with a capacity of 893.5 kWp in addition to the existing one.
- Expansion of the photovoltaic facility for the offices of the Barcelona Headquarters with a capacity of 16.7 kWp in addition to the existing one.
- Installation of photovoltaic panels at the Reinbek pharmaceutical plant with a total output of 434 kWp.
- Update of the roadmap towards a 50% reduction in natural gas consumption by 2030 at Almirall sites. This roadmap includes natural gas phase-out projects based on the electrification of heat generation, as well as their associated cost.
- The Barcelona Headquarters office site has become the first Almirall site to achieve the goal of eliminating the use of natural gas in its facilities. This has been made possible by the energy transition to 100% renewable electricity sources, which has also improved energy efficiency.
- A project to upgrade the air-conditioning and hot water system, modifying the primary water circuits and replacing the hot and cold water production equipment, has been completed, and since May 2023 the

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building's kitchen operates with electrical, and specifically Variocooking, equipment. As a result, as of March 2024, the building has been operating without natural gas.

- Furthermore, from 2024, Almirall has committed to neutralizing residual emissions, making this the company's first carbon neutral building.
- Installation of Almirall's first electric boiler at the Sant Feliu R&D site to provide domestic hot water.
- Ongoing procurement of 100% renewable electricity.

On the other hand, initiatives related to the vehicle fleet are as follows:

- Approval in April 2024 of the vehicle fleet policy for the commercial network and benefit vehicles in Italy, where vehicle emissions are limited to 35 g CO<sub>2</sub>/km.
- In 2024, the corporate SOP (Standard Operating Procedure) for sustainable mobility was approved, setting out the criteria and recommendations related to sustainability to be included in the areas of fleet management, business travel, commuting and event organization. In particular, for fleet management, the aim is to reduce emissions by 24% by 2027 and by more than 50% by 2030.
- Start of the implementation of hybrid and electric car fleet policies in Spain and Italy. By the end of 2024, 17% of the commercial vehicle fleet in Spain was hybrid and 73% of company cars were hybrid or electric.

### **Scope 3 emissions**

For Scope 3 emissions, the initiatives are divided into those related to the purchase of goods and services, upstream transport and distribution, on the one hand, and those related to employee commuting on the other. The first include the following:

- Almirall is integrating Scope 3 GHG emissions reduction targets within the sustainable procurement program by means of the Supplier Engagement Program, through collaboration with suppliers, in order to be able to perform a more accurate GHG emissions calculation and to have primary data whenever possible, as well as to collaborate with suppliers to establish emissions reduction targets aligned with Almirall's reduction targets, as explained in greater detail in section 4.1.3 "Due Diligence Processes and Procedures". The program includes monitoring the level of maturity in suppliers' GHG emissions management (see section 4.3.7 "Scope 1, 2 and 3 emissions"), meetings with suppliers to share the Group's objectives and expectations, as well as training requirements and material on various platforms available to suppliers.

In relation to the transport of goods managed by Almirall, the following stand out:

- Substitution of air shipments by sea transport for long-distance shipments. This has required grouping consignments and adjusting safety stocks in some cases.
- Approval of an internal procedure that encourages the reduction of air shipments of product compared to other means of transport with lower emissions.
- Contracting sea transport with strategic suppliers that use biofuel (insetting).
- Extending supplier approval with the option of using land transport with biofuel (insetting).

On the other hand, in relation to employee commuting, the following stand out:

- Incentives for a more sustainable mobility of Almirall's workforce remain in place.
  - o The flexible compensation scheme that includes the purchase of public transport tickets.
  - o Subsidies for the purchase of hybrid and electric vehicles.
  - o Installation of electric chargers in car parks.
- Creation of parking areas for bicycles and electric scooters.
- In addition, all Almirall centers currently have charging stations for electric vehicles, thus promoting their use.

### **4.3.6. Energy**

Energy efficiency has been a pillar of the company's environmental strategy. In 2013, Almirall was already a pioneer in the chemical-pharmaceutical industry for implementing and certifying its energy management system in accordance with the international standard ISO 50001:2011 and, in 2019, adapting to the revision of the



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ISO50001:2018 standard. Almirall has developed a “2012-2030 efficiency plan” that aims to reduce energy consumption by 35% in 2030 compared to 2011.

Almirall’s energy efficiency model is based on the iterative search for projects and new technologies, applied progressively according to the needs of each site.

In this way, the company has implemented innovative technologies such as magnetic levitation and high-compression water mist humidification. These technologies make it possible to reduce energy consumption in compressors for refrigeration equipment and in traditional evaporative resistance and/or electrolysis systems, respectively. Since 2017, photovoltaic panels have been progressively installed at all of its sites for the self-generation of renewable electricity. After adopting a commitment to reduce its greenhouse gas emissions by 50% compared to the 2019 base year, Almirall has planned an energy transition until 2030 to massively electrify its facilities, partially or totally eliminating the use of natural gas.

Currently, Almirall’s main sources of energy consumption are electricity (56%) and natural gas (44%). With regard to electricity consumption, 100% of the electricity consumed in the Spanish and German centers comes from renewable sources with Guarantee of Origin. Almirall is committed not only to purchasing green energy with a Guarantee of Origin, but also to purchasing renewable electricity through a long-term renewable energy purchase agreement (PPA) as of 2023 and onsite solar self-generation.

The company installed solar panels at its Sant Celoni and Sant Andreu de la Barca centers in 2017 and 2019, respectively. In 2022, two new photovoltaic plants were commissioned, one at the company’s headquarters and the other at the R&D center in Sant Feliu de Llobregat. In 2023, the capacity of the photovoltaic plants in Sant Celoni and Sant Andreu de la Barca (Phase I) was increased and, in 2024, the photovoltaic plant in Sant Andreu de la Barca (Phase II) was expanded again and photovoltaic panels were installed in Reinbek. With these installations, Almirall reduced the company’s grid dependence by 2,807 MWh in 2024, that being 11% of Almirall’s total electricity consumption.

Furthermore, in 2025, the company plans to expand the existing photovoltaic plant of Sant Andreu de la Barca (Phase III).

The reduction in energy consumption compared to 2011 is 27%. However, the aggregate energy consumption in 2024 increased by 3% compared to 2023 due to the fact that the Sant Celoni chemical plant was operating all year round, unlike in 2023. To a lesser extent, the Sant Andreu pharmaceutical plant also contributed to the increase in consumption, increasing its production by 14% compared to the previous year. The rest of the sites continue to reduce their energy consumption through energy efficiency and decarbonization measures.

Energy consumption and energy mix	2022	2023	2024
(1) Fuel consumption from natural gas (MWh)	20,579	19,413	20,282
(2) Fuel consumption from diesel oil (MWh)	30	36	27
(3) Fuel consumption from LPG (MWh)	23	33	19
<b>(4) Total fossil fuel consumption (MWh) (sum of 1-3)</b>	<b>20,632</b>	<b>19,482</b>	<b>20,328</b>
<b>Share of fossil sources in total energy consumption (%)</b>	<b>44%</b>	<b>43%</b>	<b>44%</b>
(5) Consumption of electricity acquired from renewable sources (MWh)	24,494	23,416	23,123
(6) Self-produced renewable electricity consumption (MWh)	1,721	2,049	2,807
<b>(7) Total renewable energy consumption (MWh) (sum of 5-6)</b>	<b>26,215</b>	<b>25,465</b>	<b>25,930</b>
<b>Share of renewable sources in total energy consumption (%)</b>	<b>56%</b>	<b>57%</b>	<b>56%</b>
<b>Total energy consumption (MWh) (sum 4 and 7)</b>	<b>46,847</b>	<b>44,947</b>	<b>46,258</b>

Table 24 Energy consumption and energy mix for the 2022-2024 period

Natural gas is expressed in energy terms according to HCV (Higher Calorific Value). LPG and diesel consumption are obtained from invoices in units of liters and kg respectively, which are expressed in energy terms according to HCV. The conversion factors used are from the “Guia de càlcul d'emissions de gasos amb efecte d'hivernacle (GEH)” published annually by the OCCC (Oficina de Canvi Climàtic de Catalunya).

The energy intensity indicator is reported in accordance with ESRS E1 Climate Change for activities with a high impact on climate change. Almirall has the CNAE code 4646 - Wholesale trade of pharmaceutical products, which falls within the group “G: Wholesale and Retail Trade; Repair of Motor Vehicles and Motorcycle”, considered as a sector with activities with high impact on climate change. Net income corresponds to the net turnover in the Group’s consolidated income statement.

Energy intensity vs. net revenues	2022	2023	2024
Total energy consumed vs Net revenues (MWh/€M)	53.3	50.2	46.9

#### 4.3.7. Scope 1, 2 and 3 emissions

The greenhouse gas (GHG) inventory was conducted following the Greenhouse Gas (GHG) Protocol guidelines for Scope 1 and 2 emissions, produced by the World Business Council for Sustainable Development (WBCSD) and the World Resources Institute (WRI).

The Scope 3 greenhouse gas inventory was conducted in accordance with the GHG protocol (GHG Protocol Scope 3 Emissions) of the World Business Council for Sustainable Development (WBCSD) and the World Resources Institute (WRI). The categories are calculated according to the “GHG Protocol Corporate Value Chain (Scope 3) Standard”. This protocol categorizes Scope 3 emissions into 15 subcategories.

To enhance the transparency and credibility of the GHG emissions inventory and ensure a robust calculation methodology, the calculation of GHG emissions is verified annually by the certification body AENOR. GHG emissions for the year 2023 have been updated in this report following verification in April 2024.

##### Justification of exclusions from the GHG emissions calculation

The calculation of Almirall’s greenhouse gas emissions includes all emissions generated by the Almirall Group. However, the Scope 1 and 2 emissions resulting from premises leased for the activity of Almirall’s international subsidiaries are excluded due to the difficulty of obtaining quality data and because of their low representativeness in the total emissions, which is less than 1%. These emissions have been estimated based on the consumption of the Barcelona headquarters.

Scope 3 emissions from category 4 (upstream transport and distribution associated with the transport of raw material), whose emissions in category 1 have been calculated using the primary data in kg, have also been excluded from the calculation. The estimate of these emissions for 2019 and 2021 represents less than 1% of the Almirall Group’s total carbon footprint.

Of the 15 scope 3 categories, it has been substantiated that the following categories do not need to be calculated:

- Category 11, Use of sold products: It has been estimated that the impact of the use phase of Almirall’s products is negligible because they do not represent an active source of emissions during their use and they have a very low average useful life.
- Category 13. (Downstream) leased assets: This does not apply to the organization because Almirall has no downstream leased assets.
- Category 14 Franchises: This does not apply to the organization because Almirall does not have franchises.
- Category 15 Investments: Investments associated with buildings and machinery are included in category 2 and no other type of un contemplated investment is made.

	2019 (Base year)	2022	2023 <sup>3</sup>	2024	Var. 2024 vs 2023
<b>Scope 1: GHG emissions (t CO<sub>2eq</sub>)</b>					
<b>Scope 1 Gross GHG emissions</b>	<b>6,864</b>	<b>7,449</b>	<b>6,154</b>	<b>5,742</b>	<b>-7%</b>
<b>Percentage of Scope 1 GHG emissions from regulated emissions trading schemes (%)</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>N/A</b>
Emissions from natural gas consumption	4,062	3,780	3,541	3,687	4%
Emissions due to fuel and/or energy consumption by the vehicle fleet	1,959	2,003	1,816	1,582	-13%
Other emission sources (leakage of refrigerant gases, process emissions or other small emission sources)	843	1,666	797	473	-41%
<b>Scope 2 GHG emissions (t CO<sub>2eq</sub>)</b>					
<b>Gross location-based Scope 2 GHG emissions</b>	<b>6,305</b>	<b>4,543</b>	<b>4,868</b>	<b>3,752</b>	<b>-23%</b>
<b>Gross market-based Scope 2 GHG emissions</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>N/A</b>

<sup>3</sup> The GHG emissions for 2023 have been revised with respect to the values presented in the 2023 report to align with the GHG verification carried out in April 2024, subsequent to the publication of the 2023 report. The differences found are 2.6% for scope 1, 0.4% for market-based scope 2 and 0.1% for scope 3.

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		2019 (Base year)	2022	2023 <sup>3</sup>	2024	Var. 2024 vs 2023
<b>Scope 3 significant GHG emissions (t CO2e)</b>						
<b>Total gross indirect GHG emissions (Scope 3)</b>		<b>162,838</b>	<b>145,483</b>	<b>156,670</b>	<b>141,899</b>	<b>-9%</b>
1	Purchased goods and services	146,940	132,743	141,310	124,321	-12%
2	Capital goods	826	1,370	1,740	2,041	17%
3	Fuel and energy-related activities (not included in Scope 1 or Scope 2)	2,294	2,290	2,067	2,047	-1%
4	Upstream transportation and distribution	1,988	1,753	1,640	2,003	22%
5	Waste generated in operations	1,711	1,140	794	963	21%
6	Business travel	6,298	3,681	6,109	7,429	22%
7	Employee commuting	788	715	1,187	1,259	6%
8	Upstream leased assets	109	63	46	116	150%
9	Downstream transportation and distribution	113	152	139	142	2%
10	Processing of sold products	389	330	354	417	18%
11	Use of sold products	N/A	N/A	N/A	N/A	N/A
12	End-of-life treatment of sold products	1,382	1,246	1,284	1,161	-10%
13	Downstream leased assets	N/A	N/A	N/A	N/A	N/A
14	Franchises	N/A	N/A	N/A	N/A	N/A
15	Investments	N/A	N/A	N/A	N/A	N/A
<b>Total GHG emissions (location-based) (t CO2e)</b>		<b>176,007</b>	<b>157,473</b>	<b>167,692</b>	<b>151,393</b>	<b>-10%</b>
<b>Total (market-based) GHG emissions (t CO2e)</b>		<b>169,702</b>	<b>152,930</b>	<b>162,824</b>	<b>147,641</b>	<b>-9%</b>
<b>GHG emissions (t CO2e)/Net revenue (€M)<sup>4</sup></b>		<b>198</b>	<b>177</b>	<b>182</b>	<b>150</b>	<b>-18%</b>

Table 25 Retrospective GHG emissions 2019-2024

The origin of the emission factors used for the calculation of Scope 1 and 2 emissions is as follows:

- Gas Natural - Spain: "Guia de càlcul d'emissions de gasos amb efecte hivernacle (GEH)" updated annually in May/June by the OCCC (Oficina de Canvi Climàtic de Catalunya).
- Location-based Electricity - Spain: "Informe de Garantías y Etiquetado de la Electricidad" updated annually in April/May by the CNMC (Comisión Nacional del Mercado y la Competencia).
- Location-based Natural Gas and Electricity - Germany: "Entwicklung der spezifischen Kohlendioxid-Emissionen des deutschen Strommix in den Jahren", updated annually in May/June by OFMA (Oficina Federal del Medio Ambiente) Germany.
- Global Warming Potential of refrigerant gases: Intergovernmental Panel on Climate Change (IPCC) sixth Assessment report (2021)
- Vehicle fleet emission factors provided by leasing companies.

The origin of the emission factors used for the calculation of Scope 3 emissions is as follows:

- Bilan Carbone™ from the French Agency for Environment and Energy Management (ADEME) for calculations based on expenditure (€) in Category 1 and 2 of purchased goods and services and capital goods and category 8 of leased assets. Annually updated report.
- Emission factors specific to suppliers or their products obtained from the supplier engagement program.
- "Greenhouse gas reporting: conversion factors", published by the UK Government's Department for Energy Security and Net Zero for calculations based on a category 1 weight basis, for category 4 transport and distribution, category 6 business travel and category 7 employee mobility, and to a lesser extent for other categories.
- Ecoinvent and an internal study conducted by Cyclus Vitae Solutions, for calculations based on weight (kg) Category 1 of goods and services purchased.
- CEDA factors from Vitalmetrics Group for category 6 business travel for calculations based on expenditure.
- "Study on actual GHG data for diesel, petrol, kerosene and natural gas" of July 2015, published by Directorate General for Energy of the European Commission (DG ENER) for category 3 Fuel and energy related activities:
- "Guia de càlcul d'emissions de gasos amb efecte hivernacle (GEH)" published by the OCCC (Oficina de Canvi Climàtic de Catalunya) for category 5 Waste generated in operations, and to a lesser extent for other categories.
- Own factors calculated from the Life Cycle Assessment of biological products for category 1 and the Life Cycle Assessment of Almirall's product packaging carried out with COMPASS for category 12.

<sup>4</sup> Net income corresponds to the net turnover in the Group's consolidated income statement

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### Evolution of compliance with Scope 1, 2 and 3 emission targets

Indicators	2019 (Base year)	2024	2025	2030	Annual percentage/base year
	Milestones and target years				
Gross market-based Scope 1 and 2 GHG emissions (t CO2e)	6,865	5,741	≥ 12%	≥ 50%	16%
Total gross indirect GHG emissions (Scope 3) (t CO2e)	162.84	141,898	≥ 8%	≥ 28%	13%

Table 26 GHG reduction milestones and target years for the 2019-2030 period

The previous tables show the evolution of GHG emissions for scope 1, 2 and 3 for the period 2019-2024. The base year for the emissions reduction targets is 2019, defined following the Science-based Target Initiative recommendations, selecting the most recent year with verifiable and representative data of a typical GHG emissions profile for the company. GHG emissions for 2019 are calculated on a calendar year basis (from 1 January to 31 December). Beginning in 2022, it is calculated from the last quarter of the previous year to the end of the third quarter of the reported year, i.e., the 2024 data covers 1 October 2023 to 30 September 2024. It is done in this way since, due to the complexity of the calculation, it is not feasible to perform it in sufficient time for the date of submission of this report. The 2023 emissions were verified in April 2024.

With regards to the market-based Scope 1 and 2 emissions reduction target, in 2024 Almirall reduced emissions by 16% compared to the base year thanks to the reduction of natural gas consumption, which was mainly due to energy efficiency actions as well as the reduction of refrigerant gas leaks and their associated impact, through better management and the progressive change of refrigeration equipment. The reduction in vehicle fleet emissions as a result of the circumstantial reduction of the fleet in the USA also contributed. It should be noted that a recovery is expected in the coming years, but from 2025 onwards the reduction indicated in the sustainable mobility policy will start to have an impact. The policy's roadmap considers a first period from 2024 to 2027 by the end of which a 24% reduction of emissions is expected and a second period from 2028 to 2030 by the end of which a 50% reduction of total emissions is expected. The reduction in 2024 was higher than the set target of 10%, due to a higher-than-projected reduction of refrigerant gases and the effect of the vehicle fleet reduction.

For Scope 3 emissions, it should be noted that the calculation method for each category is specific to the availability of data. Most of the categories use a hybrid method of calculation, where priority is given in this order: first, data supplied by suppliers is taken into account. If these are not available, the calculation of emissions is made based on primary data, and if this is not possible, the calculation is made based on economic expenditure with supplier data, and lastly, external databases will be used.

Scope 3 emissions have been reduced by 13% compared to the base year 2019. Part of this reduction is attributed to the improvement in the quality of emissions data which is a priority in the coming years in order to be able to assess the real progress of emissions in this category, and which will be reassessed with a recalculation of the base year prior to 2030.

The increase in emissions from category 6 "Business travel" for the 2022-2023 period is noteworthy due to the use of this service becoming normalized after the pandemic years and the increase in business volume, reaching levels above those of the reference base year. GHG emissions for category 7 "Employee commuting" have also increased with respect to the 2019-2023 period as a result of the emissions calculation improvement process, carried out based on the mobility survey conducted in 2023.

#### 4.3.8. GHG removal and mitigation projects financed through carbon credits

Almirall is committed to achieving net zero emissions by 2050, aligning with the Net Zero Corporate Standard of the Science-Based Targets Initiative (SBTi). As part of this strategy, the company will develop a Beyond Value Chain Mitigation (BVCM) program from 2026, with the aim of channeling finance into the carbon credit market.

In the short term (2024-2025), and until the BVCM plan has been drawn up in 2026, Almirall will carry out the following actions for this period:

- Neutralization of the residual emissions of the Headquarters (Barcelona) on an annual basis to ensure the neutrality of this site from 2024 onwards. After the elimination of natural gas consumption in its daily operations in 2024, residual GHG emissions may be generated as a result of leaks of refrigerant gases or fire extinguishing gases, and to a lesser extent from maintenance such as boiler back up.

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- Neutralization of GHG emissions from Almirall sites associated with the R&D and production process that are not related to fuel consumption.
- Neutralization of some internal Almirall events.

The credits used for the aforementioned actions come from projects certified under the *Gold Standard* and *Verified Carbon Standard (VCS)*, two of the most rigorous and globally recognized certification systems in the field of carbon offsetting. These standards ensure that carbon credits come from projects that not only contribute to climate change mitigation, but also promote additional benefits, such as biodiversity conservation and the social welfare of local communities. Furthermore, projects certified under these standards are subject to a periodic independent verification to guarantee the authenticity and effectiveness of the emission reductions, thus ensuring that the actions taken have a positive and measurable impact on the environment. This high-quality approach is in line with our strategic commitment to protecting nature and contributing responsibly to the care of the planet.

Carbon credits cancelled in reporting year	2023	2024
<b>Total (t CO2e)</b>	<b>11</b>	<b>172</b>
Proportion of removal projects (%)	100%	100%
Proportion of reduction projects (%)	0%	0%
Gold Standard	100%	0%
<i>Verified Carbon Standard (VCS)</i>	0%	100%
Proportion of projects within the EU (%)	0%	0%

Table 27 Summary of carbon credits

Carbon credits expected to be cancelled in the future	Quantity 2025
<b>Total (t CO2e)</b>	<b>250</b>

The carbon credits cancelled in 2023 were associated with a reforestation project in Kikonda (Uganda). The Kikonda reforestation project is replanting trees to reverse the degradation of this area, to enhance biodiversity conservation and to improve the economic situation of the surrounding villages with a product plan for domestic timber markets.

Impact on climate change and biodiversity:

- Biodiversity conservation.
- Reforestation projects remove CO<sub>2</sub> naturally.
- Carbon removal projects in general are unique in that they can help reduce and even reverse climate change.

Social and economic impact:

- Responsible production and consumption of timber trees.
- Improvement of the general economic situation of surrounding villages.

The carbon credits cancelled in 2024 are associated with a reforestation project in Tanzania, designed to promote climate change mitigation and adaptation through the reforestation of degraded lands, as well as to contribute to alternative livelihoods for people in Tanzania.

Impact on climate change and biodiversity:

- Reforestation of degraded grasslands converting wasteland into biodiversity-rich forests.
- Combat climate change by capturing CO<sub>2</sub>.

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- Protection against deforestation through sustainable forest management.
- Biodiversity enhancement through soil preservation, water supply conservation, land management and flora enrichment.
- Distribution of seeds produced by regional commercial tree nurseries run by local people.

#### Social and economic impact:

- Facilitate the socio-economic development of local communities through carbon revenues, employment, training and various forms of infrastructure.
- Construct school buildings and provide training on forest management practices.
- Provide training on entrepreneurship for women and equal employment opportunities within the project.

#### 4.3.9. Internal carbon pricing

Almirall's business is not energy intensive, and so its operations are not regulated by emissions trading schemes such as ETS, *Cap & Trade* or *Carbon Tax*. However, in the context of its net zero emissions strategy and its ambition to limit global warming to 1.5°C, the implementation of internal carbon pricing is being considered. We are assessing how these mechanisms can best be integrated into our sustainability strategy. While current regulation does not require us to adopt these instruments, we recognize their value in incentivizing the reduction of emissions and aligning with our long-term climate goals.

By 2025, a detailed study is planned on the implementation of an internal carbon pricing mechanism to reduce indirect Scope 3 emissions, specifically in the business travel category.

### 4.4. Pollution

#### 4.4.1. Impact, Risk and Opportunity Management

The prevention of water, air and soil pollution is crucial to Almirall's environmental systems. The release of toxic pollutants and industrial waste degrades natural environments and affects the quality of water, air and soil, putting human health and biodiversity at risk. Almirall addresses these challenges through sustainable and effective strategies to prevent, mitigate and offset pollution at all its sites.

The Environment department, which is part of the Sustainability area coordinated by the Global Sustainability Executive Director, is responsible for identifying pollution-related risk indicators. The most relevant risks and impacts have been identified within the framework of the 2024 Double Materiality analysis.

#### **Risks**

- **Regulatory risks:** Possible legal action and financial penalties for potential non-compliance with environmental regulations related to pollution of air and soil and the discharge of wastewater in excess of the legal limits. These infringements could lead to substantial additional costs and damage Almirall's reputation.

#### **Negative Impacts**

- **Air pollution:** Originating from the emissions of polluting gases during research, development and production activities, as well as from the transport and distribution of people and resources in Almirall's operations, and even through the purchase of goods and services.

#### **Positive impacts**

- **Mitigation of air pollution:** Reduction of Volatile Organic Compound (VOC) and other particulate air emissions through the installation of advanced technology at Almirall's industrial sites.
- **Mitigation of water pollution:** Almirall and its partners (including Contract Development & Manufacturing Organizations) promote measures to prevent and reduce water pollution in its industrial operations, including the implementation of wastewater treatment systems, the adoption of cleaner technologies and the promotion of sustainable water management practices. These actions preserve water quality, protect aquatic life and ensure access to clean water for nearby communities.

#### 4.4.2. Policies related to pollution

As mentioned in the 4.3.4 "Policies related to climate change mitigation and adaptation", Almirall has a Sustainability Policy and a Corporate Policy on Safety, Occupational Health and the Environment. Both are in

turn applied in their entirety to issues related to pollution prevention, as well as to reducing the environmental impact of operations along their value chain.

These policies demonstrate the company's commitment to promoting practices that contribute to specifically addressing pollution. In turn, the practices are integrated into Almirall's daily work processes, ensuring proactive measures to prevent, reduce or remedy carbon emissions that affect and pollute the environment, taking into account any form of activity involving atmospheric pollution; including water, air, soil, noise and light pollution.

#### 4.4.3. Actions, targets and resources related to pollution

##### Air pollution

At Almirall, the most significant impact on atmospheric pollution is the emission of volatile organic compounds (VOCs) from its chemical plants during the manufacture of the different active pharmaceutical ingredients, and to a lesser extent from its Sant Andreu pharmaceutical plant.

In December 2022, the BREF WGC Directive - Common Waste Gas Management and Treatment Systems in the Chemical Sector -, was published, which aims to describe BAT (Best Available Techniques) or a combination of BAT to reduce diffuse and channeled air emissions and thus achieve better environmental protection.

In order for us to adapt to these regulations, with the effective date of said Directive being 12 December 2026, a study has been carried out at both chemical plants to determine the design values of the emissions to be treated as well as an evaluation of the best emission treatment technologies. The study also assesses the need to optimize the operation of the existing purification systems or to implement a new treatment technology that, in addition to purifying emissions, will contribute towards meeting the new environmental challenges and guarantee compliance with the regulations in force and those that will be applied in the near future.

The adaptation to the above-mentioned regulation in the 2024-26 period is key for the future of the chemical plants and will involve the use of the best available VOC mitigation technology and entail a significant investment for the company. This implementation incorporates the decarbonization strategy as the anticipated regenerative thermal oxidation systems will be electric instead of the usual natural gas systems.

As for the capital expenditure (capex) amounts associated with the actions to attain the air pollution targets, these are not considered material in relation to the Group's budgets. This information is consolidated into larger financial items, which, at the accounting level, makes it significantly more difficult to identify the individual items of each associated amount in the financial statements.

**Meta:** Adaptation of fine chemicals plants to the BREF WGC Directive - Common Waste Gas Management and Treatment Systems in the Chemical Sector.

Year	Coverage	Action	Description	CAPEX (€ thousands)
2023 - 2024	Chemical Plants	Characterization of the emissions to be treated and technological proposal aligned with BATs.	Study to determine the design values of the emissions to be treated, to carry out an assessment of the best emission treatment technologies and to evaluate the need to optimize the operation of existing treatment systems or to implement a new technology.	85
2024 - 2025	Ranke SCE	Installation of new regenerative thermal oxidizer.	Purchase of a new electric regenerative thermal oxidizer (RTO) and a Quench & Scrubber system with a maximum capacity of 4,000 Nm <sup>3</sup> /h.	1,227
2024	Ranke SAB	Segregation of emissions prior to the regenerative thermal oxidizer.	Segregation of process vents and treatment facility for these emissions. It will consist of a Scrubber and two heat exchangers in order to minimize emissions to the atmosphere.	175
2025	Ranke SAB	Characterization of emissions to be treated by the RTO.	Characterization of the emissions to be treated after segregation of part of the current emissions.	1,500
2025-2026	Ranke SAB	Installation of new regenerative thermal oxidizer.	Purchase of a new electric regenerative thermal oxidizer (RTO)	

Table 28 Actions to mitigate or prevent air pollution

### Water pollution

Almirall's main actions regarding water pollution are aimed at preventing and minimizing pollution, ensuring a safe discharge and complying with the legally applicable requirements.

A highlight of recent years has been the installation of a wastewater treatment plant with UV-oxidation technology, which will be commissioned in 2024 at the pharmaceutical plant in Reinbek. This technology ensures the removal of active pharmaceutical ingredients (APIs) from water discharged into the public sewage system.

Also in 2024, an evaporator has been commissioned for the on-site treatment of segregated cleaning water from manufacturing at the Sant Andreu de la Barca pharmaceutical plant. This prevents pollution in wastewater discharge and minimizes the waste managed externally.

As for the capital expenditure (capex) amounts associated with the actions to attain the air pollution targets, these are not considered material in relation to the Group's budgets. This information is consolidated into larger financial items, which, at the accounting level, makes it significantly more difficult to identify the individual items of each associated amount in the financial statements.

These actions and others are summarized in the table below:

<b>Meta:</b> Reduce pollution in wastewater discharges and improve existing wastewater treatment facilities			
<b>Year</b>	<b>Coverage</b>	<b>Action</b>	<b>CAPEX (€ thousands)</b>
2022-2024	Reinbek Pharmaceutical Plant	Installation of a UV-chemical oxidation wastewater treatment plant.	1,133
2023-2024	SAB Pharmaceutical Plant	Installation of a wastewater evaporator	255
2025	Ranke SCE	Automation of the wastewater treatment plant and digitalization of meters for consumption control.	180
2025	Ranke SCE	Relocate sewage treatment plant pumps to eliminate confined space.	38

Table 29 Actions to mitigate or prevent water pollution

### Pollution of soil

Given the nature of Almirall's operations and those of the third parties in its value chain, the pollution of the soil has been identified in the 2024 Double Materiality Analysis as a potential risk only, and mainly in terms of potential legal action and financial penalties for non-compliance with current environmental regulations.

#### 4.4.4. Air pollution

According to the disclosure requirements of the CSRD, this section should include emissions from installations in which the applicable threshold value in Annex II of Regulation 166/2006 on the European PRTR (European Pollutant Release and Transfer Register) is exceeded. Emissions into the atmosphere from Almirall's industrial facilities do not exceed the threshold values for the different pollutants specified in the aforementioned annex.

In relation to Almirall's activities subject to the IED (Industrial Emissions Directive 2010/75/EU of the European Parliament and of the Council):

#### Installations within the scope of the IED and BAT conclusions

- Ranke Química Sant Celoni: IED Group 4.5, IDQA 6
- Ranke Química Sant Andreu: IED Group 4.5, IDQA 933

No cases of non-compliance with the permit conditions (IEA: Integrated Environmental Authorization) have been recorded

#### Conclusions about Best Available Techniques (BATs) (BAT-associated emission levels (BAT-AELs) and BAT-associated environmental performance levels (NCAA-BAT))

- Ranke Sant Celoni has a report with a detailed analysis of the best available techniques (BAT) that are applied or planned to be applied, as described in the Commission Implementing Decision (EU) 2022/2427 of 6 December 2022, establishing the best available techniques (BAT) conclusions for



common waste gas management and treatment systems in the chemical sector. This report was submitted to the competent authority in December 2023.

Compliance is justified for all applicable BATs, including the five BATs for diffuse fugitive and non-fugitive emissions of VOCs (BAT 19 to 23), based on the emission inventory (BAT 2), which are to be integrated into the environmental management system by 12 December 2026. Similarly, the compliance and monitoring of channeled emissions for the different pollutants (TSP, VOC, HCl, CO, NO<sub>x</sub>, PCDD/F) is planned for 2026 in accordance with the requirements of BAT 8. Monitoring and control is currently carried out in accordance with the provisions of the current permit (IEA).

- Ranke Sant Andreu de la Barca has a statement that includes a detailed analysis of the best available techniques (BAT) applied or planned to be applied, as described in the Commission Implementing Decision (EU) 2022/2427 of 6 December 2022 establishing the BAT conclusions for common waste gas management and treatment systems in the chemical sector. This was submitted to the Competent Authority in June 2024, within the framework of the Early Review of the Integrated Environmental Authorization.

Compliance with all applicable Best Available Techniques is has been substantiated.

- With regards to the BATs for diffuse emissions of VOCs (BAT 19 to 23) based on the emissions inventory (BAT 2), which are to be integrated into the environmental management system by 12 December 2026, and aware of the difficulty of preparing the solvent balance, intensive monitoring is currently underway to improve the results and so as to comply with BAT 21 (estimation of diffuse emissions of VOCs from the use of solvents).
- The establishment currently performs all the controls and monitoring at the sources requested by the current Environmental Authorization and Ranke will comply with all the requirements indicated in BAT 8 before the entry into force of the new BREF WGC in December 2026.

#### 4.4.5. Water pollution

With regards to wastewater discharges, reducing the flow and pollutant load of liquid discharges involves acting on the pollutants generated in the processes themselves and, for this reason, Almirall's operating centers have wastewater treatment facilities

The Sant Andreu de la Barca pharmaceutical plant and the Sant Feliu de Llobregat R&D center carry out primary treatment of their wastewater, while the Sant Andreu chemical plant carries out primary and secondary treatment, and the Sant Celoni plant, in addition to primary and secondary treatment, also carries out tertiary treatment. All Almirall's centers discharge into public sewage systems except for the Sant Celoni chemical plant, which discharges into a public watercourse (La Tordera river).

With regards to wastewater discharge, reducing the flow and pollutant load of liquid discharges entails acting on the pollutants generated in the processes themselves. Accordingly, Almirall's operating centers have wastewater treatment facilities, and the chemical plants in particular have physical-chemical and biological wastewater treatment plants. At all sites, the average of the parameters does not exceed 70% of the legal limit.

In relation to Almirall's activities subject to Directive 2010/75/EU, according to implementing decision (EU)2016/902 establishing best available techniques (BAT) conclusions for common water treatment and management systems:

- Both the Sant Celoni and Sant Andreu de la Barca chemical plants comply with all the BATs applicable to them. They have diagrams of water use and sanitary and industrial wastewater flows. The wastewater generated is treated in their respective treatment plants and the different parameters are analyzed daily, in accordance with the established procedures, ensuring compliance with the limits set by the Environmental Authorization prior to discharge of the same.
- In accordance with the management system implemented in the establishment, water consumption is minimized to what is essential and necessary for the process, and the pollutant load of the discharged wastewater is reduced by collecting the polluted water from the process and it being managed as waste by authorized waste managers. Separate stormwater and wastewater networks ensure that potentially polluted water is adequately treated before its final discharge.
- Ranke Química Sant Celoni also has a report justifying its compliance, submitted to the Competent Authority in December 2021, as part of the application for Substantial Modification of the Environmental Authorization.

#### 4.4.6. Pollution of soil

Given the nature of Almirall's operations and those of the third parties in its value chain, the pollution of the soil has been identified in the 2024 Double Materiality Analysis as a potential risk only, and mainly in terms of potential legal action and financial penalties for non-compliance with current environmental regulations.

At Almirall, the potential impact on the pollution of soil is attributed to the Chemical Plants. In 2015, the baseline soil study required by Spanish Law 5/2013 was carried out, which includes:

- Identification of hazardous substances used at the site, both current and historical.
- Description of the areas of concern in terms of potential impacts on the subsoil of the site.
- Description of the history of the site.
- Identification of the environmental setting of the site.
- Investigation of the subsoil of the site due to historical and present activities carried out on the site.
- Proposal for the establishment of an environmental monitoring and control network (soil and groundwater).

As regards soil quality, the analytical results of the samples indicated that the analyzed compounds were mostly below laboratory detection limits or reference levels. Likewise, in the groundwater samples no compounds were detected that were above the reference values considered.

In 2017, the technical reports were received with the conditions derived from the assessment of the base reports by the Competent Authority. A Monitoring and Control Program for soil quality was made compulsory at a frequency of 5 years.

The results of these controls to date have been satisfactory.

### 4.5. Water

#### 4.5.1. Impact, Risk and Opportunity Management

Climate change has become a critical factor for global water resources. The increasing unpredictability of climate affects water availability and quality, and related disasters such as floods and storms have increased significantly in recent decades, exposing communities to greater risks. Almirall faces these challenges, as the increased frequency and severity of floods and heavy rains could disrupt manufacturing and damage its production facilities. Droughts can also cause water and energy shortages, raising the acquisition costs for water and supplies. Barcelona and Sant Celoni in Spain are particularly vulnerable to these risks, with a possible exacerbation in the long term.

As in the case of pollution, the Environment department, under the coordination of the Global Sustainability Executive Director, is responsible for identifying risks related to water resources in Almirall's own operations and those of its third parties. The most significant risks and impacts have been identified in the context of the 2024 Double Materiality analysis.

##### **Risks**

- **Regulatory risks:** Operational constraints and increased costs from fines and penalties due to over-abstraction of water and mismanagement in Almirall's value chain.

##### **Opportunities**

- **Regulatory opportunities:** Improving regulatory compliance through the implementation of a Strategic Water Management Plan for 2024-2030. The plan aims to increase resilience to water scarcity and drought by addressing the integrated management of water from abstraction and use to treatment and discharge, with an emphasis on the analytical parameters of discharges.

##### **Negative Impacts**

- **Over-abstraction of water:** Over-abstraction of water from surface sources, groundwater or rainfall, resulting from Almirall's operations and those of its suppliers at different levels of the value chain (including Contract Manufacturing Organizations), which contribute to the depletion of the Earth's natural freshwater reserves.

### Positive Impacts

- **Sustainable water management:** Promotion of sustainable water management by Almirall and its partners (including Contract Manufacturing Organizations), addressing responsible water consumption and abstraction. This includes the design of initiatives to increase water reuse mainly in industrial processes, as well as in research and development processes.

#### 4.5.2. Policies related to water consumption

As mentioned in the 4.3.4 "Policies related to climate change mitigation and adaptation", Almirall has a Sustainability Policy and a Corporate Policy on Safety, Occupational Health and the Environment. Both apply in their entirety to issues related to the efficient management of water, and the use and supply thereof, in accordance with local water stress constraints.

Almirall's water policies focus on the efficient management of the resource and the proper control of wastewater discharges, ensuring responsible practices in its daily operations. These actions reflect the company's commitment to sustainability and to reducing the environmental impact of water use. However, these policies do not include specific provisions on the design of products and services aimed at efficient water consumption or the preservation of marine resources, as these areas have not been identified as material for Almirall.

#### 4.5.3. Actions, targets and resources in relation to water consumption

Almirall's sustainability strategy Act4Impact 2024-2030 includes amongst its shorter-term priorities the efficient management of water as one of the essential resources for production and for society in general. 2024 has been critical, with the episode of drought that has been affecting all Almirall sites in Spain since 2020 worsening and entering an emergency phase at the beginning of the year. It should be noted that, since June 2024, it has returned to the level of alert.

The actions carried out during 2024 have been aimed at managing the drought status and setting targets for reducing water abstraction by 2030.

#### Actions carried out in 2024

##### Water Saving Plans

The Water Saving Plans (WSP) that affect industrial sites in Spain analyze the baseline consumption and quantify the water saving actions carried out in recent years in order to take them into consideration in periods of water consumption restrictions.

By submitting these plans, the Authority granted both sites a decrease in the mandatory percentages of water consumption reduction:

Situation	Regulatory percentage of reduction	Authorized percentage of reduction	
		Sant Andreu de la Barca Pharmaceutical Plant	Sant Celoni Chemical Plant
Normality and pre-alert	0%	-	-
Alert	5%	5%	5%
Exceptionality	15%	11%	5%
Emergency	25%	18.4%	5%

Table 30 Water consumption saving plans

##### Water reuse projects

At the Sant Andreu pharmaceutical plant, since 2024, reject water from continuous sampling have been collected for reuse in the industrial water line. The installation of a second osmosis plant is also planned for 2025 so as to reuse the reject water from the industrial water treatment plant.

At the Sant Feliu R&D center, water reuse measures were implemented in 2023-24, such as the reuse of reject water from the purified water production plant for irrigation and fire-fighting. It has been estimated that these measures have generated savings of approximately 500 m<sup>3</sup> per year.

### Projects to reduce water consumption and improve water efficiency

At the pharmaceutical plant in Sant Andreu de la Barca, Ranke Sant Celoni, at the Headquarters and at the Sant Feliu R&D site, water-saving measures have been implemented for several years now, such as the installation of internal meters that are enabling a more efficient management of water consumption and the detection of anomalies.

Additionally, in 2023-2024:

- At the Sant Feliu R&D site, some of the taps in some bathrooms have been replaced and measures to optimize cleaning processes are being studied.
- At Ranke Sant Celoni, new meters have been installed and level and pumping systems have been optimized. On the other hand, it is planned to add new meters in 2025.
- At the Sant Andreu de la Barca pharmaceutical plant, cleaning processes have been optimized and a meter digitalization project is planned.
- Rinsing and filter-cleaning have been temporarily minimized at the headquarters.
- At the Reinbek pharmaceutical plant, the cleaning processes of the purified water plant's filters and cooling processes have been optimized and the tank cleaning system has been changed to reduce water consumption.

### Drought groups

In 2024, multidisciplinary working groups have been created in Spain's industrial and R&D centers with the aim of identifying and implementing new saving measures, improving the efficiency of processes associated with water consumption, increasing water recirculation, as well as awareness-raising actions.

### 2030 Reduction Target

Almirall's new sustainability strategy Act4Impact 2024-2030 will incorporate a target to reduce water consumption by an aggregate 25% across all Almirall sites by 2030 compared to baseline consumption. This target will be incorporated as a Planet KPI in the next revision of the Sustainability Dashboard, after validation by the Sustainability Committee and subsequent approval process.

The baseline consumption of this objective corresponds to the average consumption of the last three years in which the activity has been carried out normally and the hydrological situation has been normal, i.e., there has not been any type of restriction due to drought, and corresponds to the 2020-2022 period.

The projects related reducing the abstraction, increasing process efficiency as well as implementing water recirculation measures are detailed in the following table. It should be noted that the amounts associated with the actions to reduce water consumption are not material to the Group's total CAPEX and for this reason they cannot be reconciled with the Group's Consolidated Financial Statements.

Water abstraction reduction targets vs. baseline consumption (2020-22)	2023	2024	Purpose 2030
Water reduction ratio (%)	14%	18%	25%

Water abstraction reduction actions	2022-23	2024	2025
Meters (m <sup>3</sup> )	-	-	
Water abstraction (m <sup>3</sup> )	7,358	500	8,000
Process optimization (m <sup>3</sup> )	3,478	432	0
Equipment replacement (m <sup>3</sup> )	0	0	0
Drought status restrictions (m <sup>3</sup> )	4,000 - 5,000	0	0
CAPEX (€ thousand)	22	62	60

Table 31 Water abstraction reduction target and actions

### 4.5.4. Water consumption

At the production sites, industrial processes are designed to comply with Good Manufacturing Practices (GMP) and contribute to minimizing water consumption.

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The water sources used are company water at all Almirall's sites, and well water is used at the Sant Andreu de la Barca pharmaceutical plant, Ranke Sant Celoni and the Sant Feliu R&D site.

According to the Water Risk Filter (WRF), WRI Aqueduct tool as well as the Catalan Water Agency (ACA, Agencia Catalana del Agua) database, all Almirall's sites in Spain are located in water risk areas.

The table below provides details of the water abstraction at Almirall according to the source of supply and based on the readings obtained directly from the meters installed in the wells and the readings from the water supply companies.

In 2024, water consumption decreased by 18% compared to baseline consumption. This reduction is due to both domestic and well water consumption. The facilities that have registered the greatest reduction are the pharmaceutical plants and the R&D center in Sant Feliu. These achievements consolidate the actions undertaken in recent years, as well as the restrictions implemented since the declaration of the exceptional drought status.

	Abstraction Baseline <sup>5</sup>	2022	2023	2024
<b>Total water abstraction (m<sup>3</sup>)</b>	<b>125,753</b>	<b>127,669</b>	<b>108,436</b>	<b>102,533</b>
Company water (m <sup>3</sup> )	63,983	58,639	56,270	49,522
Well water (m <sup>3</sup> )	61,770	69,030	52,166	53,011
<b>Total water abstraction in water stressed areas (m<sup>3</sup>)</b>	<b>108,641</b>	<b>114,188</b>	<b>93,895</b>	<b>91,078</b>
<b>Re-use ratio (%)</b>	<b>7</b>	<b>7</b>	<b>8</b>	<b>5</b>
<b>Total water abstraction (m<sup>3</sup>)/ Net revenue (€M)</b>	<b>151</b>	<b>148</b>	<b>121</b>	<b>104</b>

Table 32 Water abstraction by source, water stress and % of reuse

### Water reuse

Since 2020, several water reuse actions have been implemented at Almirall's centers. At the Sant Andreu pharmaceutical plant, the rejection from the osmosis treatment is reused in the production of purified water that is introduced into the industrial water production circuit. At Ranke Sant Celoni, the reject water from the ion exchange resins is recirculated to feed the fire-fighting system. An estimated 200 m<sup>3</sup> of reject water was reused in 2024.

The new measures implemented in relation to the reuse of water have led to a saving of more than 90% in the consumption of well water at the Sant Feliu R&D Site. The monitoring projects carried out this year have made it possible to determine our consumption more accurately and the reuse ratio calculated for 2024 is lower than the value obtained in previous years as a result.

Water is stored at our sites in cisterns where a total of approximately 600 m<sup>3</sup> of water is stored. Possible changes in the storage of these tanks are due to cleaning and/or maintenance.

### CDP Water Security

In 2023, Almirall obtained a B rating in its first year of assessment (2023) for Water Security. In 2024, the CDP questionnaire on water cycle management was submitted, but the result has not yet been obtained as of the date of issuing this report.

## 4.6. Biodiversity and ecosystems

### 4.6.1. Impact, Risk and Opportunity Management

Almirall is committed to protecting biodiversity and ecosystems, but although this area is included in the 2024-30 strategic sustainability plan, it is not a priority in the short term (2024-25) due to the nature of the Group's operations. Due to the fact that all its industrial and research sites are located in designated industrial areas, far from natural areas, it is not deemed necessary to consult the communities, as there is no direct impact on them. To date, no significant biodiversity-related risks or opportunities have been identified. Therefore, a resilience analysis of Almirall's biodiversity and ecosystems strategy and business model is not relevant to the company and will not be covered in this report.

<sup>5</sup> The baseline consumption of this objective corresponds to the average consumption of the 2020-22 period, when the activity has been carried out normally and the hydrological situation has been normal, i.e. there has not been any type of restriction due to drought.

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However, in the 2024 Double Materiality analysis, relevant impacts have been identified in Almirall's value chain. These are limited to impacts on the extent and condition of the ecosystems. The identified impact is as follows:

### **Positive Impacts**

- **Reforestation:** Restoration of green areas by means of reforestation activities carried out by Almirall and its partners (including R&D centers, Contract Development & Manufacturing Organizations) in areas affected by company activities that are at risk of desertification.

### **4.6.2. Policies related to biodiversity and ecosystems**

As mentioned in section 4.3.4 "Policies related to climate change mitigation and adaptation", Almirall has a Corporate Sustainability Policy and an Occupational Health, Safety, and Environment Policy covering commitments related to the protection of nature.

Reflecting the importance that the company attaches to biodiversity and environmental sustainability in its organizational structure, these policies demonstrate the company's commitment to promoting specific practices for pollution prevention, water management, the circular economy, sustainable use of resources and protection of nature. Almirall also considers the social consequences of the company's activities throughout the value chain, acting with full awareness of the environment and social needs in each of the countries in which it operates.

Finally, the policy aims for these practices to be inclusive and to demonstrate diverse concerns and needs, affirming a comprehensive and strategic commitment to environmental sustainability.

### **4.6.3. Biodiversity actions, targets, resources and metrics**

As explained in section 4.6.1, in accordance with Almirall's strategic plan, biodiversity-related targets will be set from 2026 onwards. This decision responds to the need to prioritize activities according to their relative importance and the availability of internal resources.

Although no specific targets have been set, in 2024, Almirall has carried out a project to build a green roof on one of the two headquarter buildings in Barcelona. This green roof, which covers an area of 908 square meters, provides a habitat for a variety of plant species, fostering a healthy and diverse urban ecosystem, helping to filter pollutants from the air and ultimately contributing to a cleaner and healthier environment for the local community. On the other hand, the green roof will help mitigate the urban heat island effect, creating a cooler and healthier microclimate. This investment has a cost €252,000.

### **4.6.4. Biodiversity**

With regards to Almirall's activity and its possible impact on biodiversity, all the industrial and research centers are located in designated industrial areas, so they do not directly affect any endangered species. The only centers located near natural areas are the Sant Feliu R&D center (350 m from the Collserola Natural Park, which is included in the Barcelona Provincial Council's Natural Areas Network), and the Sant Celoni chemical plant (located approximately 300 m from the area included in the Serres de Montnegre-el Corredor Natural Areas Plan (PEIN), which is also included in the Natura 2000 Network). Almirall's activity does not adversely affect the biodiversity of the protected areas indicated.

In November 2021, an environmental impact study was carried out as a requirement for the renewal of the Environmental Authorization of the Sant Celoni chemical plant. The study concluded that there are no significant effects on biodiversity, protected areas or the Tordera river and its aquifers, even at maximum production capacity. In addition, since 2008, a water quality study of the Tordera river has been carried out annually, showing an increase in the richness of species and biotic indices.

In the event of an environmental emergency, Almirall has self-protection plans in place to minimize the negative impact on people and the environment at all of its sites.

## **4.7. Resource use and circular economy**

### **4.7.1. Impact, Risk and Opportunity Management**

Almirall manages resources responsibly, promoting circularity to ensure the sustainable use of limited resources throughout its value chain and the appropriate management of the waste generated in its operations. According to the 2024 Double Materiality analysis, experts from Almirall's different business areas have not identified any significant risks or negative impacts related to resource use and circular economy. Positive opportunities and impacts have been identified in this area.

### **Opportunities**

- **Efficiency in the use of resources:** Improvement in resource efficiency through the implementation of advanced technologies, such as virtual laboratory simulations, which make it possible to digitally replicate laboratory environments and reduce dependence on physical resources. This innovation not only reduces material procurement costs, but also optimizes waste management. Deployment of big data management platforms in the industrial area that optimize resource consumption by identifying inefficiencies, improving the speed of decision-making, and even automating the necessary actions.
- **Procurement of sustainable resources:** The adoption of sustainable practices in the procurement of goods and services, including the purchase of reused, remanufactured and recycled materials, represents a significant opportunity for Almirall to reduce costs and advance its sustainability goals.

### **Positive Impacts**

- **Eco-design:** Promoting product circularity through the principles of eco-design by Almirall and its partners (including Contract Development & Manufacturing Organizations) during the product development phases in R&D and production, thus contributing to waste reduction and a lower extraction of raw materials.
- **Promotion of circularity:** Promoting circular economy practices by Almirall, its suppliers and other actors in the value chain, with a particular focus on reducing waste sent to landfill. Waste reduction, reuse and recycling is promoted at all stages of the value chain, contributing to the conservation of resources and the reduction of environmental impact.
- **Packaging/Containers:** Implementation of sustainable packaging, preferably made from recycled or biodegradable materials, in Almirall's operations and in its marketed products, thus reducing waste generation and promoting responsible resource management practices, contributing to the conservation of forests and the reduction of Almirall's carbon footprint.
- **Waste management:** Adoption of measures for the proper management and disposal of hazardous waste, such as solvent or chemical waste in chemical plants, cleaning water and other by-products in pharmaceutical plants, laboratory waste in R&D and production operations throughout Almirall's value chain. These actions minimize risks to human health and the environment, protecting air and soil quality and preserving local biodiversity.

#### **4.7.2. Policies related to resource use and circular economy**

As mentioned in section 4.3.4 "Policies related to climate change mitigation and adaptation", Almirall has a Sustainability Policy and an Occupational Health, Safety and Environment Policy. Both encompass commitments and actions related to sustainability and efficient resource management, highlighting the importance of the transition towards a lesser use of virgin resources and an increased use of renewable resources, following the principles of the circular economy, with an inclusive and sustainable approach.

Reflecting the importance that the company attaches to this issue in its organizational structure, these policies demonstrate the company's commitment by promoting practices that contribute towards specifically addressing the circular economy, through the reuse, recycling and reduction of raw material consumption, taking product life cycle assessments with a focus on product design into account, among other things. In turn, the practices are integrated into Almirall's daily work processes, ensuring proactive measures, and demonstrating a comprehensive and strategic commitment to circular economy principles.

#### **4.7.3. Actions, targets and resources related to resource use and circular economy**

Almirall's corporate strategy integrates sustainability criteria into the design of its products, from the R&D phases to the end-of-life of the product, including its manufacture and distribution.

Almirall's 2024-30 strategic plan addresses the circular economy in two main areas:

- **Sustainable packaging:** the main objectives are to reduce the impact of packaging by focusing on using more sustainable materials and avoiding unnecessary materials; product-specific projects to improve the sustainability of a specific product identified as having a low level of sustainability or capacity for improvement; examining the Digital Product Passport introduced by the ESPR (Ecodesign for Sustainable Products Regulation) in order to be prepared; and promoting the recyclability of products.
- **Zero waste to landfill:** this has the priority of preventing waste from going to landfill, ensuring a safe waste management and promoting recyclability wherever possible.

### **Sustainable packaging actions implemented in 2024**

#### **Initiatives to improve the sustainability of packaging**

As of 31 December 2024, more than 43 initiatives have been generated for evaluation, 6 of which were completed in 2024. These initiatives are ranked according to impact and difficulty of implementation in order to prioritize their implementation. The capex/opex of these actions was not material. We highlight the following:

- Elimination of band/strip for inclusion of in-line material control code: the in-line material control code is incorporated into the label body, allowing the elimination of the band that currently carries it and the consequent reduction in the amount of material used. It affects 63 finished product references, and by 2024 it has been implemented in 48 references.
- Change from plastic to paper labels for leaflets and booklets of products manufactured at the Sant Andreu de la Barca plant. In the process of technical validation for implementation in biological products (Ilumetri and Ebglyss) and respiratory products.
- Change of tamper-evident label material from plastic to transparent paper: It concerns prescription products manufactured at Almirall's facilities. In the process of technical validation.
- Replacement of plastic trays with cardboard trays for Ilumetri: implementation planned for the first quarter of 2025.

#### **Use of cardboard certified by the Forest Stewardship Council (FSC)**

The use of FSC-certified cardboard is being implemented progressively. Since 2021, all grouping crates at the Sant Andreu de la Barca and Reinbek production sites were FSC-certified.

Since 2022, the use of FSC cardboard is also being implemented in the packaging of medicinal and non-medicinal products manufactured at Almirall sites. By the end of 2024, the company had implemented FSC in 155 references of a total of 264 product categories and countries where it is permitted to include the FSC symbol.

The 2025 target is to implement paper and the FSC symbol in 65 more references.

Beyond the units where it is feasible to include the symbol, the project seeks to also include FSC in those references that do not allow the inclusion of the FSC symbol, but do allow the use of FSC paper.

#### **Elimination of package leaflets in cosmetic specialties and dietary supplements**

Elimination of package leaflets for cosmetic products, dietary supplements and personal grooming that do not require patient information or when the information can be provided on the box and/or raw material itself.

Of 127 product references in the above-mentioned categories, the leaflet has been eliminated or omitted in 82 (65%).

By 2025, the target is to eliminate the leaflet in 15 more references.

### **Actions to improve the outflow of resources 2024**

In 2023-24, improvement actions include the implementation of projects to treat production wastewater at the Sant Andreu de la Barca and Reinbek pharmaceutical plants, with the aim of minimizing the volume of wastewater managed as waste. In addition, in the specific case of Reinbek, APIs (Active Pharmaceutical Ingredients) are removed from the wastewater.

At the Sant Andreu pharmaceutical plant, the technology installed is an evaporator that will reduce the volume of externally segregated and managed cleaning water by 80%. This plant has been in operation since September 2024.

A water treatment plant with photo-Fenton chemical oxidation technology has been installed at the Reinbek pharmaceutical plant. After a trial period, its approval was certified by TÜV in November 2024.

Also, as part of the circular economy strategy, during the months of April to July 2024, Almirall donated more than 1,430 pieces of office and kitchen furniture from the Sant Just Desvern offices and the Sant Feliu de Llobregat R&D center, through the *Banc de Recursos* foundation and its "*Pont Solidari*" line of action. This initiative, which has benefited more than 30 social entities, including associations that support groups at risk of social exclusion, as well as people with disabilities and in vulnerable situations, promotes the circular economy by giving a second life to items that are in good condition and still useful.



#### 4.7.4. Waste management

Almirall manages its waste responsibly, prioritizing minimization and the most sustainable and safe treatment for each type. In the tables below, waste is broken down into the following categories:

- **Hazardous/Non-hazardous (according to typology):** Hazardous waste corresponds mainly to solvent waste at chemical plants, chemical waste and cleaning water at pharmaceutical plants, and laboratory waste at research and development centers. Almirall does not generate radioactive waste at its facilities. Non-hazardous waste consists basically of waste similar to urban waste and packaging waste from pharmaceutical plants.
- **Recoverable/non-recoverable (according to treatment):** Recoverable waste is waste for which the management route is recycling, preparation for re-use or other recovery operations. Non-recoverable waste is waste that is destined for incineration, landfill or other disposal operations. The Group plans to report the breakdown of waste treatment from 2025 onwards.

The following tables show the evolution of waste for the 2022-2024 period for Almirall and the breakdown by countries. A significant 12% decrease in waste generated at Almirall was mainly due to the reduction of non-hazardous non-recoverable waste in Germany thanks to the new wastewater treatment plant which avoids the external management of cleaning water as waste.

Total Almirall Group Waste (t)	2022	2023	2024
<b>Hazardous waste</b>	<b>1,608.9</b>	<b>1,262.3</b>	<b>1,950.7</b>
Recoverable	1,259.6	924.9	1,635.1
Non-recoverable	349.3	337.4	315.6
<b>Non-hazardous waste</b>	<b>3,239.2</b>	<b>3,303.1</b>	<b>2,339.0</b>
Recoverable	553.4	637.8	701.9
Non-recoverable	2,685.8	2,665.3	1,637.1
<b>Total waste</b>	<b>4,848.1</b>	<b>4,565.4</b>	<b>4,289.7</b>
<b>% Hazardous</b>	<b>33%</b>	<b>28%</b>	<b>45%</b>
<b>% Recoverable</b>	<b>37%</b>	<b>34%</b>	<b>54%</b>

Table 33 Total waste - Almirall Group

Waste in Spain (t)	2022	2023	2024
<b>Hazardous waste</b>	<b>1,577.1</b>	<b>1,228.8</b>	<b>1,914.9</b>
Recoverable	1,244.9	906.5	1,613.2
Non-recoverable	332.2	322.3	301.7
<b>Non-hazardous waste</b>	<b>1,258.8</b>	<b>1,233.1</b>	<b>962.5</b>
Recoverable	424.5	499.0	563.6
Non-recoverable	834.3	734.1	398.9
<b>Total waste</b>	<b>2,835.9</b>	<b>2,461.9</b>	<b>2,877.4</b>
<b>% Hazardous</b>	<b>56%</b>	<b>50%</b>	<b>67%</b>
<b>% Recoverable</b>	<b>59%</b>	<b>57%</b>	<b>76%</b>

Table 34 Total waste – Spain

Waste in Germany (t)	2022	2023	2024
<b>Hazardous waste</b>	<b>31.8</b>	<b>33.5</b>	<b>35.8</b>
Recoverable	14.7	18.4	21.9
Non-recoverable	17.1	15.1	13.9
<b>Non-hazardous waste</b>	<b>1,980.4</b>	<b>2,070.0</b>	<b>1,376.5</b>
Recoverable	128.9	138.8	138.3
Non-recoverable	1,851.5	1,931.2	1,238.2
<b>Total waste</b>	<b>2,012.2</b>	<b>2,103.5</b>	<b>1,412.3</b>
<b>% Hazardous</b>	<b>2%</b>	<b>2%</b>	<b>3%</b>
<b>% Recoverable</b>	<b>7%</b>	<b>7%</b>	<b>11%</b>

Table 35 Total waste - Germany

#### Management of users' medicine waste

In Spain, Almirall is a member of the Integrated Packaging Management and Collection System (SIGRE, Sistema Integrado de Gestión y Recogida de Envases), in order to comply with Spanish Royal Decree 1055/2022, which regulates the management of packaging and packaging waste in Spain. By including the SIGRE symbol on its packaging, Almirall guarantees that both the material of the containers and any leftover

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medicine they may contain are managed in an environmentally responsible manner, recycling packaging material and managing any leftover medicines safely.

In Germany, Almirall adheres to the *Duale System Deutschland* (DSD) in order to comply with the Packaging Ordinance (VerpackV) issued by the Federal Ministry for the Environment.

The packaging materials of Almirall's products in Spain and Germany are shown below. The two together account for 37% of Almirall's total units sold. In both markets, the material with the highest percentage is paper/cardboard, corresponding mainly to cases, with 50% of the total in Spain and 32% in Germany. In all other geographical areas, the specific regulations of each country are complied with.

Packaging material in Spain (t)	2022	2023	2024
Glass	40.5	38.7	36.8
Paper/Cardboard	399.0	433	431.0
Aluminum	39.5	37.6	38.9
Plastic	87.0	101.7	89.9
Composite material	250.1	263.1	266.6
<b>Total materials</b>	<b>816.1</b>	<b>874.1</b>	<b>863.2</b>

Table 36 Packaging material in Spain

Packaging material in Germany (t)	2022	2023	2024
Glass	53.9	49.7	57.0
Paper/Cardboard	57.5	55.4	61.2
Aluminum	22.5	23.8	25.4
Plastic	39.7	37.2	37.6
Composite material	11.5	9.5	11.1
<b>Total materials</b>	<b>185.1</b>	<b>175.6</b>	<b>192.3</b>

Table 37 Packaging material in Germany

#### 4.7.5. Consumption of starting materials

Almirall uses software to control the acquisition and consumption of raw materials in relation to a defined standard for each production process. Deviations from established standards are analyzed and corrective actions implemented to ensure efficiency in the production processes. The data presented are from direct measurements (kg consumed per material) obtained from the company's system (SAP), while in the case of capsules a conversion factor from units to kg has been used. Consumption for the 2022–2024 period for the different types of raw materials (in tons) is shown below:

Type of raw material (tn)	2022	2023	2024
Excipients	1,477	1,491	1,397
Chemical plant raw materials	865	693	1,182
Active substance	1,192	1,310	1,303
Starting and intermediate materials	60	38	76
<b>Total</b>	<b>3,594</b>	<b>3,532</b>	<b>3,958</b>

Table 38 Raw material consumption (tn)

## 5. Social

### 5.1. The Almirall Culture

At Almirall, corporate responsibility, integrity and transparency are key pillars in the way it operates. Almirall is committed to generating long-term sustainable value for staff, reinforcing this commitment through a strong compliance program. This program ensures compliance with the ethical standards of the pharmaceutical industry and the Code of Ethics, which reflects the principles, values and guidelines for conduct, ensuring that the team always acts with integrity and ethics.

Almirall's culture is based on the following Purpose: "Transform the patients' world by helping them to make their hopes and dreams for a healthy life come true", putting patients at the center of all activities. This Purpose not only inspires the group's workforce to do their best, but also imbues a deeper meaning to their daily work.

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Almirall is committed to its workers and their talent. All of them are key to the company's success and the goal is to attract and retain exceptional professionals. The development of the employees and their professional growth within the organization are key, and this was demonstrated once again by the award in 2024 of the prestigious Top Employers certificate for the seventeenth consecutive year in Spain, and for the first time in Germany.

Furthermore, Almirall is concerned about the well-being and engagement of its employees, establishing different listening channels in order to know what are their concerns and needs, so as to adapt policies, programs and processes to them and align these with the company's needs. We regularly conduct commitment and culture surveys in order to devise and implement initiatives that reinforce the sense of belonging and ensure the organizational culture necessary to achieve their goals.

In 2021, driven by the desire to be a leading company in the field of medical dermatology, we made a daily effort to transform the lives of patients and to overcome challenges as a team, facing up to new ways of working and leading, Almirall had to take a new approach to the organizational culture. For this reason, a culture survey was launched to gauge our employees' opinions on how people work, how they relate to each other, make decisions and collaborate at Almirall. Getting to know Almirall's personality allowed us to identify opportunities as a team and recognize which strengths to build on.

One of the proudest aspects is to have a team that is very committed to participating in such surveys. There was a high level of participation in this culture survey, which allowed us to obtain reliable results that enabled us to start working. The results revealed that, despite the effort made in recent years in implementing various initiatives to get closer to the desired culture, there was still room for improvement.

That's why it was necessary to carry out a holistic and coordinated intervention in the medium to long term that would have an impact on the different pillars of the organizational culture: from the review of how the different teams of the company are organized, to the development of skills and capabilities that are needed both in the present and in the future.

Another fundamental aspect of this plan was to have the involvement of our employees from the outset, as this holistic intervention could not be successful without the participation of the people who form part of Almirall. It was also very important that this transformation be experienced as an opportunity for the entire team, bringing with it changes, challenges, new ways of thinking, relating, supporting and learning.

This holistic intervention was structured in two phases.

- First phase: Discovery and definition of the fundamentals of the culture (January 2022 - June 2022)
- Second phase: Implementation of initiatives to help transform the culture (June 2022 onwards)

**First Phase:** The main goals of the first phase were:

- To understand today's culture in depth
- To design the desired culture, the one that Almirall needs to successfully achieve sustainable success, providing growth and well-being to all employees and strengthening our commitment to patients and customers
- To define the leadership skills that a leader must demonstrate on a day-to-day basis if he or she is to become a culture facilitator and a role model when it comes to achieving defined objectives.
- Definition of initiatives that help to implement the new culture

The Management Board worked intensively on the main objectives of this first phase. It also had the involvement of a working group called the "Employee Advisory Team", in order to carry out this process in an inclusive manner, taking the employee's voice into account. The Senior Leadership team was also taken into account in this inclusive process.

The desired culture was defined and communicated throughout the organization. A communication plan was designed to make all people feel part of this journey and excited about this change.

The results of this first phase are the pillars of the new culture, and are detailed below:

Vision: Almirall aspires to have a people-focused culture in which everyone gives their best, patients and customers are at the heart of every decision, and whose focus and agility make it possible to generate a greater impact for everyone.

Purpose: Transform the patients' world by helping them realize their hopes and dreams for a healthy life

**Cultural changes:** Three fundamental changes have been identified to speed up our cultural transformation.

- **Unleash the potential of our employees:** it is a matter of showing the way to motivate each other to find the best way forward and to take risks when necessary.
- **Patients and customers at the center:** we are moving from an internally-focused mentality to one where we place the patient and customer at the heart of every decision.
- **Achieving results:** we are moving from trying to do everything to prioritizing and simplifying to achieve greater impact.

**Values:** Values have been updated to serve this new culture. While listening and empathy are at the heart of everything we do, individual, team and organizational courage must be fostered, as well as innovation to remain competitive, and simplification to focus on what is most important. The new values that we have established are the following:

- **Care:** We listen and we empathize, we help each other to succeed, and we value diversity of perspective and experience.
- **Courage:** We challenge the status quo, we take full responsibility and we learn from our successes and failures.
- **Innovation:** We place the patient and the customer at the center, we create innovative solutions and we promote an entrepreneurial mindset.
- **Simplicity:** We act decisively, without getting lost in excessive analyses, we are agile and we simplify and before we do anything, we understand why we are doing it.

In this phase, key leadership skills were also defined so that leaders can focus their development on those capabilities that will help them to be promoters of our culture. They conducted a self-reflection exercise through a questionnaire to identify their strengths and opportunities for improvement. With this exercise they defined an individual development plan to start working on their growth as Almirall leaders.

“**Make your Mark**” is the slogan that was defined to sum up the new culture in a few words, and to invite them to give the best of themselves. The goal is to communicate the new culture on a more personal and emotional level, to reach the hearts of our employees, to inspire them and to convey how they can make a difference in this change.

Finally, initiatives were defined to help transform the culture. Two types of initiatives were identified: initiatives for rapid and visible implementation in the short term and initiatives with a medium- to long-term impact that will help to significantly speed up our cultural transformation.

**Second phase:** Almirall is currently in the second phase, the main goals of which are:

- To implement the initiatives identified in the first phase
- To continue to develop leaders on their development journey to be the leaders Almirall needs.
- To carry out interventions to communicate and manage the change that help to further internalize the pillars of our new culture.

Short-term initiatives have already been implemented and feedback from employees is highly positive. Each of these is linked to a cultural change identified in the first phase.

### ***Actions taken to strengthen an ethical corporate culture***

Short-term initiatives:

- **Unleash employee potential:** various flexibility measures called “Turn it FLEX” were implemented, allowing employees to manage their work more flexibly and efficiently, creating a work environment based on trust and empowerment. The dress code was also relaxed, creating a more casual, informal and modern environment. In 2023, we went a step further by extending flexibility to our offices with a policy of not allocating spaces. The main objectives of this initiative were: 1) improve interpersonal relationships and boost creativity, collaboration and connection between departments; 2) increase flexibility and agility of project needs, allowing the creation of temporary multifunctional spaces in a simple way in areas that have been vacated and; 3) reinforce a non-hierarchical organization by freeing all private rooms previously used by Senior Leadership, allowing them to be closer to the teams and create collaborative spaces.
- **Patients and customers at the center:** we have started to invite all Almirall employees to virtual Town Halls where relevant information about the company is shared so that each employee feels that they are playing a part and can contribute to the *Purpose*. The feedback from all Global Town Halls is very good. Almirall’s people appreciate this informal space where the entire company team is connected.

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- **Achieving results:** each senior leader undertook to simplify or eliminate one process in their area of responsibility by March 2023. Bearing in mind the number of Senior Leaders, 100 processes were simplified as a result of this initiative. Throughout 2024, a communication campaign was launched where everyone at Almirall could see some examples of these simplifications.

The medium- to long-term initiatives implemented throughout 2023 and that continue to have an impact in 2024 are as follows:

- **GPS (Go, Perform, Succeed):** a new Performance model that provides us with a more modern, simple and transparent way of managing performance, adapted to the current and future demands of the work environment. In addition, GPS brings with it a change in the variable remuneration payment model, so that it better rewards good performance.
- **Smart Meetings:** this initiative brings with it a series of actions that facilitate more efficient management of our meetings as well as an impact on the way we work, make decisions and prioritize. In addition, the implementation of these actions helps Almirall's people to better manage their working time and find more space for thinking and planning.
- **Into the Core:** this initiative consists of awareness and education campaigns aimed at everyone at Almirall to get to know the patients and customers better, to gain a better understanding of their needs and feelings and to reflect on how the daily work of everyone in the company, regardless of their function/role, contributes to making their hopes and dreams come true. Apart from these campaigns, we also want to adjust our activities and processes to be a fully patient-centered organization, building an empathetic mindset and putting patients and customer at the heart of everything we do.

Both short-term and medium- to long-term initiatives are global in scope. On the other hand, each functional area and subsidiary has also defined change initiatives that affect their area of responsibility. To implement the different initiatives, work teams are being created in which employee involvement is key to success.

In addition to the initiatives, interventions for Senior Leaders were also carried out, with the aim of developing them to become the leaders that Almirall needs in order to achieve our ambition. The main initiatives are as follows:

- **Annual Leadership Meeting:** Each year the Senior Leaders meet to review Almirall's strategy, the milestones achieved and the business opportunities we have as a company. At this meeting we also discuss topics of culture and the importance of our role in promoting it.
- **360° Feedback:** in late 2023, early 2024, all members of the Management Board participated in the 360° Feedback process. This exercise is very powerful because the participant receives feedback on their leadership competencies from multiple perspectives: their direct leader, their peers, direct subordinates and other stakeholders with whom they work. This exercise allowed them to draw up their individual development plan in order to continue developing as Leaders at Almirall. This exercise is currently being implemented for all Almirall Senior Leaders and once they have drawn up their individual development plan, they will be offered a coaching process to accompany them in the implementation of their plan.

To analyze how the culture is evolving, we use a new listening platform that allows us to invite employees to take short surveys, called pulses, which enable us to carry out the listening processes in a far more agile way. This platform also allows us to be more digital because it provides us with a much more efficient, valuable and in-depth analysis of results by using a methodology based on Artificial Intelligence.

In July 2022, a first pulse was implemented where employees were asked how we were doing compared to the desired culture. The results obtained provided a baseline diagnosis for monitoring progress during 2023 and beyond. Each leader also obtains their results and shares them with their teams so that they can work on more specific day-to-day actions, generating a space of trust and transparency.

From 2022 until now, 5 pulses have been conducted, showing a gradual increase in employee satisfaction by means of an indicator called eSat (Employee Satisfaction), which has risen from 75 eSat in 2022 to 79 eSat in November 2024. These results demonstrate significant progress and a steady development. It is increasingly difficult to measure up to the eSat as well as have a very high level of participation (79% participation) providing very reliable results in order to keep working towards the ambition as a company.

Current eSat results are one point above the top 25% of companies in the global benchmark index.

In parallel to the implementation of the aforementioned initiatives, a communication and change management plan is being implemented whose protagonists are the people concerned. A new digital channel has been

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created, the “Make your Mark” app, through which employees can participate in challenges, and learn and internalize the important aspects of our new culture.

There is also a community of Culture Ambassadors made up of a diverse team of 40 Almirall employees from different functional areas, subsidiaries and positions whose goal is to accompany their colleagues on this transformation journey, sharing the initiatives that are being implemented, listening to their contributions and transmitting enthusiasm for this opportunity for growth that this cultural transformation entails for the entire Almirall team.

Lastly, all people programs, processes and tools have been reviewed and updated incorporating our new Leadership values and skills, to ensure that their management helps us to live the new culture and that the Almirall team develops the new capabilities it needs to transform the lives of patients, and to be a leading company in the field of medical dermatology.

The company has different levels of dialogue with workers to ensure that all opinions are taken into account, especially those of less representative groups.

Thus, the most commonly used mechanisms are:

- **The pulses:** the surveys addressed to all workers, as mentioned above. They are short in duration and their aim is to find out a worker’s point of view on various initiatives and actions being carried out by the company. They are generally launched twice a year,
- **Workshops/focus groups:** generally, after each pulse, meetings are organized with the teams, usually led by the People&Culture team of the Area as well as by the leaders themselves who are invited to share and discuss the results with their teams.
- **People&Culture Business Partner meetings:** In order to take into account the specific needs of the teams, the People&Culture Business Partners have been meeting with the different leaders/managers of each area.

## 5.2. Own Workforce

The talent of Almirall’s team is key to the company’s success. Almirall strives to attract and retain high-level professionals, promoting their development and growth within the organization and prioritizing their well-being and engagement, as demonstrated by the Top Employers certificate, obtained in Spain for the 17th consecutive year in 2024, and obtained in Germany for the first time in 2024.

### 5.2.1. Impact, Risk and Opportunity Management

Almirall has implemented communication channels to gather their concerns and needs, enabling the adaptation of policies, programs and processes that are aligned with people’s expectations and corporate objectives. Engagement and Culture surveys are regularly conducted in order to define and implement initiatives that reinforce the sense of belonging and a goal-oriented organizational culture.

In terms of risk management, Almirall integrates the risks related to its personnel in a corporate process led by the Executive Director Internal Audit, with the different business areas in charge of identifying and managing the risks in their respective areas.

In the 2024 Double Materiality analysis, the most relevant risks, opportunities and impacts were identified for Almirall’s own and external personnel, including construction workers, service contractors, temporary agency staff and interns in all geographical areas. These material impacts span both internal operations and the company’s value chain, including its products, services and business relationships.

#### Risks

- **Social dialogue:** Potential loss of staff at Almirall due to low social cohesion and engagement, caused by the scarce participation in collective bargaining and lack of collective agreements. This can reduce productivity and damage the reputation of the Group compared to competitors that do promote collective bargaining.
- **Absenteeism:** Potential increase in absenteeism due to illness and non-occupational accidents linked to unsafe working conditions. Without adequate health and safety policies, such as ergonomics programs and prevention training, work-related stress and injuries can lead to an increase in staff turnover, reduce productivity and raise costs.

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- **Diversity, Equality and Inclusion:** Difficulty in attracting talent and succession planning in key roles due to lack of incentives and discrimination in opportunities, development and remuneration, based on gender, race, disability, etc.
- **Violence and harassment:** Increase in complaints, fines and penalties for sexual or physical harassment at work, and the lack of effective measures and clear equality policies. This can lead to legal penalties, reputational damage and a higher staff turnover due to a hostile work environment and the lack of support.

### **Opportunities**

- **Labor conditions:** Almirall's practices of safe employment, adequate wages and decent working hours result in higher numbers of job applications from potential talent and the retention of skilled human capital, generating an optimal work environment for motivation and performance, and strengthening the company's good reputation in these aspects.
- **Organizational culture:** Initiatives for cultural change and to promote Almirall's values, such as the Cultural Reinforcement Program in chemical plants, encourage positive changes in the beliefs and behaviors of Almirall's talent, especially in health, safety and environmental practices, improving the work environment.
- **Social dialogue:** Almirall increases productivity by promoting the satisfaction and well-being of its workforce through clear and functional communication channels, which also improves staff retention thanks to the positive assessment of working conditions.
- **Work-life balance:** Offering an appropriate work-life balance reduces stress and burnout, increases productivity and motivation, and strengthens the commitment of talent to Almirall.
- **Health and safety:** Transforming health surveillance into a comprehensive initiative improves the physical, emotional, social, professional and financial well-being of the workforce.
- **Diversity, Equality and Inclusion:** The ongoing implementation of policies for equal pay and equal opportunities strengthens Almirall's reputation as a socially responsible company committed to inclusion and diversity.
- **Violence and harassment:** The recurrent implementation of anti-violence and anti-harassment measures ensures a safe and respectful work environment, improving employee morale and strengthening Almirall's reputation as an ethical employer.
- **Talent development and training:** The greater development of talent at Almirall compared to the industry standard positions the company as a leader in professional growth and talent retention.
- **Privacy:** The constant implementation of personal data protection policies ensures compliance with privacy laws, strengthening trust in Almirall.

### **Negative Impacts**

- **Social dialogue:** A potentially negative perception among the community and external stakeholders in the event of ineffective collective bargaining at Almirall could result in a low percentage of employees being covered by collective agreements. This could be interpreted as a lack of commitment by Almirall to the well-being and rights of its workforce, opening it up to criticism of its labor practices.
- **Health and safety:** Failure to comply with occupational safety standards can lead to accidents in the workplace, affecting both own staff and third parties, and generating concern in the community.
- **Diversity, Equality and Inclusion:** Discriminatory employment practices, such as the gender pay gap and the exclusion of people with disabilities, can perpetuate social inequalities, lack of diversity in the sector and marginalization in society.
- **Violence and harassment:** The lack of effective measures against violence and harassment at work could perpetuate a negative work culture that influences the normalization of abusive behavior in other work environments and in society, thus contributing to the persistence of violence and harassment at the community level.

### **Positive Impacts**

- **Labor conditions:** Implementing fair labor practices at Almirall (appropriate working hours, fair wages, risk management) strengthens its staff and contributes towards achieving social and economic stability in the communities, improving the well-being of staff and their families.

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- **Social dialogue:** Almirall promotes freedom of association and collective bargaining, improving the working conditions and well-being of its workforce, which in turn strengthens labor relations and contributes to social and economic stability.
- **Work-life balance:** Almirall improves the satisfaction of its employees and their environment through measures such as reduced working hours and teleworking, promoting a healthy balance that benefits the mental and physical health of its employees and strengthens social cohesion in the communities.
- **Health and safety:** Almirall ensures safe working conditions, which improves its reputation and raises the standards in the pharmaceutical industry, contributing to a safer and healthier work environment in society.
- **Diversity, Equality and Inclusion:** Almirall promotes gender equality, the inclusion of people with disabilities and diversity, building a more inclusive society and improving the company's image in its communities.
- **Violence and harassment:** Almirall fosters a respectful and safe work environment, which reinforces society's trust and contributes to building safer and more equitable communities.
- **Talent development and training:** Almirall promotes skills development and training, empowering its staff and contributing to the economic and social growth of communities by improving employment opportunities.
- **Human Rights:** Almirall promotes the abolition of forced and child labor, protecting fundamental rights and strengthening social cohesion as well as the sustainable development of communities.
- **Privacy:** Almirall respects the individual rights of employees through privacy policies, reinforcing public trust and promoting ethical data protection standards at EU level.

### 5.2.2. Policies related to own workforce

Almirall is an organization defined by shared values and a firm commitment to improving the quality of life of the people it serves. Each member of the team plays a crucial role in this mission, contributing through their daily actions and decisions to the future development of the company and the well-being of patients and customers.

Almirall's values are the foundation that guides its culture, the forms of internal collaboration and relations with its collaborators. Its culture is aligned with its Purpose and encourages every employee to contribute in a meaningful way, giving direction and meaning to all of the organization's initiatives.

It is essential to recognize that working conditions must focus on ensuring secure employment, fair wages, an adequate regulation of working time to achieve a work-life balance and the engagement of workers through social dialogue and freedom of association. In addition, collective bargaining is one of the keys to improving labor rights and benefits.

Similarly, equal treatment and equal opportunities at work are fundamental to ensuring a fair work environment. This includes gender equality and equal pay for work of equal value, as well as the inclusion of people with disabilities and the promotion of diversity.

It is also vital to prioritize health and safety, to take action against violence and harassment, and to not tolerate practices such as child labor and forced labor. Together, these aspects promote a respectful and equitable work environment for all Almirall employees.

For this reason, a series of policies related to Almirall's own employees have been developed, covering three fundamental issues: working conditions, fair treatment and equal opportunities and rights, which are not only linked to the work environment, but also transcend it.

### Code of Ethics

Almirall is an organization defined by shared values and a firm commitment to improving the quality of life of the people it serves. Each member of the team plays a crucial role in this mission, contributing through their daily actions and decisions to the future development of the company and the well-being of patients and customers.

Almirall's values are the foundation that guides its culture, the forms of internal collaboration and relations with its collaborators. Its culture is aligned with its Purpose and encourages every employee to contribute in a meaningful way, giving direction and meaning to all of the organization's initiatives. The company's conduct is governed by respect for law, integrity, fairness and transparency. Each person working for the company must adhere to the standards set out in Almirall's Code of Ethics, updated in October 2024, which is the company's frame of reference and is endorsed by the Chairman, CEO and Management Board.



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The Code of Ethics focuses, among other things, on the development of people and the work environment, promoting inclusion, diversity, zero tolerance of discrimination and harassment, data protection, and occupational health and safety. These aspects are considered key to the company's impacts, risks and opportunities.

Almirall is also committed to Good Laboratory Practice (GLP), Good Clinical Practice (GCP) and Good Manufacturing Practice (GMP), as well as to the innovation, quality, efficacy and safety of its products. The company ensures that all its activities comply with the applicable legal requirements for the production of medicines and manages the safety of pharmaceutical products, monitoring any adverse events. To this end, all staff and contractors receive the necessary training to ensure safety and clarity in the distribution of responsibilities.

As a public interest company, Almirall maintains transparency in its communications, benefiting investors, the general public, the financial community and the market. The Management Board, the company's main management body, is responsible for drawing up the company's policies and strategy, ensuring compliance with applicable laws and regulations.

It is essential that Almirall's working conditions guarantee secure employment, fair wages and a work-life balance, fostering social dialogue and freedom of association. Collective bargaining is key to improving labor rights and benefits.

Equal treatment and opportunities at work are essential to ensuring a fair work environment. This includes gender equality and equal pay for work of equal value, as well as the inclusion of people with disabilities and the promotion of diversity.

It is also vital to prioritize health and safety in the workplace and to take measures against violence and harassment. Together, these aspects promote a respectful and equitable work environment for all Almirall employees. Furthermore, child or forced labor is strictly forbidden at Almirall.

To ensure these principles are followed, Almirall has developed policies covering three fundamental issues: working conditions, fair treatment and equal opportunities and rights, which are not only linked to the work environment, but also transcend it. These policies are generally applicable and mandatory for all Almirall staff globally, promoting a respectful and fair work environment.

### **Corporate Policy People and Culture**

At Almirall, we promote the establishment of a solid and coherent framework to foster a corporate culture that respects ethics, diversity, and inclusion, focusing on continuous talent development, training, and performance management, ensuring that all employees, regardless of age, gender, sexual orientation, race, marital status, political opinion, origin or religion, have the same opportunities for growth.

The purpose of this policy, in force since October 2015, is to create and maintain a common and consistent framework for establishing and measuring relevant People & Culture processes and activities, including corporate culture and its development, ethical conduct, diversity, equity and inclusion, management of official languages, talent development and training, and the performance appraisal model. During 2024, work has been carried out on its update, which is expected to be approved by the Management Board in early 2025.

In this way, we seek to address the IROs linked to the development of talent and training, diversity, equality and inclusion and social dialogue, which apply to all Almirall Group employees, without discrimination based on age, gender, origin or religion, following the principles of the United Nations Global Compact, the Universal Declaration of Human Rights, the OECD guide for multinational companies and the fundamental regulations and conventions of the International Labor Organization.

To comply, the company has several people management processes and activities in place to support its people in their development, such as GPS or "Turn it Flex", as well as the provision of training, talent development and team development. In turn, particular issues of recruitment, compensation and benefits, methodologies associated with workforce management, corporate culture and well-being are addressed and will be set out in detail in the policies below.

Those ultimately responsible for the compliance and monitoring of this policy are the Senior Director Global C&B, Labor Relations & People Administration and all Almirall employees, who are obliged to report any suspected violation of these policies in accordance with Almirall's Code of Ethics and other internal guidelines, with suspected violations being reported to their line manager or their local People & Culture compliance representative, or through SpeakUp!, an internal whistleblowing channel available to all employees. In the same vein, Almirall provides a series of policies covering fundamental issues relating to the working conditions of its employees, listed below:

### **Mobility Policy**

This Standard Operating Procedure (SOP), in place since 2020, sets out the guidelines and terms and conditions for the international assignments of employees worldwide, supporting both the employee and leaders during the process, which is overseen at the organizational level by the Senior Director Global C&B, Labor Relations & People Administration, providing information and guidelines applicable to the different international assignments. It applies to all Almirall employees and to new employees who are transferred from their country of origin to another country.

The main objectives of this policy are to attract, develop and retain talent in a competitive market, to establish a general framework for attracting new talent, developing internal talent, and ensuring a smooth transition for the employee and his/her family to the new assignment, minimizing the impact on the spouse's career, family lifestyle and adjustment to the new home. These objectives, in turn, respond to issues such as impacts, risks and opportunities in terms of working conditions, work-life balance, development and training.

### **Policy on Modification and Approval, Compensation of Benefits**

This is another SOP that is in force since April 2024, it is directly linked to the Global People & Culture Corporate Policy and its objective is to determine when an approval process is necessary, to establish the process of authorization and approval for different situations such as new hires, internal promotions, annual and extraordinary salary reviews, retentions and bonuses, among other things, and to define the roles and responsibilities of each person involved in the process, ensuring compliance with the principles of external competitiveness and internal equity, as well as budget alignment.

In this way, we seek to respond to those impacts, risks and opportunities related to work-life balance and working conditions and to the development and training of Almirall's employees in accordance with the Group's values.

Like the previous policies, this is a global corporate document and is applicable throughout the organization, under the guidance of the Senior Director of Global C&B, Labor Relations & People Administration.

### **Teleworking policy**

According to the current regulations, teleworking is work carried out on an occasional basis at a location away from the company's headquarters. The main objective of this SOP is to regulate the conditions of the SOP that are directly related to working conditions, work-life balance, privacy and health and safety, as part of Almirall's impacts, risks and opportunities.

The main topics covered are:

- Eligibility criteria for rendering a service in teleworking mode
- Insurance and accident cover
- Working hours
- Means, equipment and tools
- Compensation of expenses
- Information security
- Prevention of occupational risks

This policy, in force since July 2022, is applicable in all of Almirall's offices in Spain for functions that can be and/or are permitted to be provided in teleworking mode, and a monitoring committee is in place for the application and development of the agreement. For the rest of the offices in other geographies, Almirall adapts to the local regulations of each country.

### **Data Protection Policy**

This policy, effective since October 2024, responds directly to privacy, which the company has identified as both an impact and an opportunity.

Almirall has a Global Data Protection Officer (GDPO) who is responsible for overseeing compliance with applicable data protection laws and operational policies and procedures, among others. The GDPO also has an internal Privacy Office that assumes other functions in order to supervise the obligations related to the protection of personal data and responsibilities for related risks.

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The policy is available to all of Almirall's own workforce on the intranet, all of this with the aim of ensuring compliance with applicable data protection and privacy laws. For more details on the policy, see 2.2.3 "Business conduct policies".

### **Remuneration Policy of the Board of Directors**

The main objective of this policy, which is effective until 2022 and has been updated in 2024, is to establish the precepts for directors' remuneration and processes for the preparation of the proposed directors' remuneration policy for approval. This policy is linked to aspects of work-life balance and working conditions developed in the company's opportunities and impacts and is implemented in accordance with the Corporate Enterprises Act and Almirall's Articles of Association within the territory of Spain. Further details on the Remuneration Policy for Members of the Board of Directors can be found at 2.1.2 "Board Committees".

### **Occupational Health, Safety and Environment Policy**

Like the Sustainability Policy, this policy, last updated in October 2024 and under the ownership of the Global Sustainability Executive Director, is an essential pillar for assuring the well-being of workers and the sustainability of operations, because it not only establishes clear guidelines for minimizing risks in the workplace, it also promotes environmental protection, integrating these principles into the company's day-to-day operations. In turn, it responds to the impacts, risks and opportunities discussed at the beginning of this chapter on working conditions and health and safety.

For employees, this policy ensures a safer, healthier and more sustainable work environment by guaranteeing the following basic principles:

- The commitment to the safety, health and well-being of employees, promoting integration of the same into the company's daily work processes.
- The commitment to eliminating hazards and reducing risks to occupational health and safety.
- The commitment to providing the organization with occupational health and safety management systems and continuously improving the performance of the same, in compliance with the applicable legal requirements and other requirements to which Almirall voluntarily subscribes.
- The establishment of a wellness plan that holistically addresses the physical and mental well-being of people working in the organization, with the commitment to provide safe working conditions and promote healthy lifestyles and habits at home and at work.
- The integration of occupational health and safety into the different levels, processes and standards of the organization.
- The training, involvement and participation of Almirall's staff and partner companies in the application of the principles contained in the policy.
- The commitment to consultation and participation of workers and, where they exist, workers' representatives, on issues considered relevant or required.
- The assurance of the necessary information on Health, Safety and Environment is available through specific manuals and/or standard operating procedures, which shall be maintained and periodically updated as necessary.
- The allocation of appropriate resources to support the effective implementation and continuous improvement of the Health, Safety and Environment system and the planning on how best to use them.
- The setting up of regular programs and actions to achieve the objectives in accordance with the applicable regulations, Almirall's Sustainability Strategy, and the risks and opportunities identified in terms of occupational risk prevention and environmental protection.

The Corporate Sustainability Committee is responsible for implementing, maintaining and monitoring a Safety, Health and Environment management system; and, in turn, all Almirall employees must ensure that the elements of this policy are correctly applied, regardless of their position or function.

### **Diversity, Equity and Inclusion program**

Almirall strives to respect and integrate the cultures and traditions of the communities where it is present, whilst remaining true to its own corporate and founding values and principles. All of this whilst seeking to create a safe and open environment where all workers can express themselves freely and openly, respecting the privacy and confidentiality of individuals.

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Guaranteeing the right to decent work is an essential part of the human rights sphere, as has been recognized by international organizations such as the UN and the ILO. In this regard, the policies governing Almirall's actions in this area (equality, diversity and harassment protocols, as well as the Code of Ethics), in force since October 2024, revolve around compliance with current labor regulations/legislation and are directly related to impacts, as well as risks and opportunities linked to organizational culture, social dialogue, diversity, equality and inclusion.

Almirall is firmly committed to the most vulnerable groups and those at risk of social exclusion, and this is reflected and expressed in the company's Code of Ethics, in section 2.2, published on the Group's intranet and available to all employees. There, explicit mention is made of the commitment to diversity and inclusion, fostering relationships based on mutual respect and equality, without discrimination based on race, age, gender, marital status, sexual orientation, political opinions, religion or any other personal, physical or social condition of the workers, or any other characteristic that could make them unique. The Senior Director Global C&B, Labor Relations & People Administration is responsible overall for ensuring compliance with and monitoring of this policy.

To this end, due diligence procedures have been implemented to ensure compliance with these regulations. These procedures materialize in the design and implementation of policies, plans and programs that allow the company to verify compliance and proper observance of human rights within Almirall.

More specifically, through these procedures, Almirall guarantees, among others:

- Compliance with regulations on hiring and working conditions, which exclude abusive, forced or illegal labor situations, specifically child labor, from occurring in any of the Group's companies.
- Observance of non-discrimination and equality provisions by having plans and programs in place to guarantee non-discrimination in terms of gender (Equality Plans), as well as to prevent the violation of the rights of groups at risk of social exclusion.
- Respect for its workers' rights of unionization and free assembly through maximum compliance with the provisions of Organic Law 11/1985, of 2 August, on Trade Union Freedom in Spain, as well as for the rights and guarantees stipulated in the labor regulations for the members of the Legal Representation of Workers at all Almirall centers.
- Support for its workers' health and safety by implementing prevention plans and complying with the regulations on risk prevention and occupational health and safety.

### **Human Rights Policy**

In 2022, Almirall's Board of Directors approved and made public a Human Rights Policy, as an expression of the company's commitment to the respect and protection of Human Rights in the communities in which it is present, in its own operations and in the supply chain. Almirall undertakes not to participate in or be complicit in actions that compromise or jeopardize the universal human rights recognized in the national legislation in line with internationally recognized standards in this area, expressly including respect for diversity based on race, age, gender, marital status, sexual orientation, political opinions, religion or any other personal, physical or social condition, prohibiting discrimination, forced and child labor, and promoting a safe and dignified work environment. Suppliers are expected to respect human rights and audits are conducted to ensure compliance. In addition, patient privacy and safety are protected and clinical trial regulations are strictly adhered to. Almirall is also committed to the rights of the communities where it operates and is continuously monitoring to prevent and mitigate risks.

At Almirall, there is a strong commitment to ensure respect for human rights in all areas and levels of its business organization, which is achieved through the appropriate corporate policies, which have been designed based on the principles of the United Nations Global Compact, the Universal Declaration of Human Rights, the OECD guide for multinational companies and the fundamental regulations and conventions of the International Labor Organization.

As a consequence of the above, all production processes at Almirall are carried out in fair working environments, governed by values such as respect for human dignity and the autonomy of the individual, rejecting and prohibiting forced and child labor and human trafficking, as well as equality, these being just a few of the core values that govern the company's business activity.

Thus, this policy seeks to respect the human rights-oriented approach to deal with those impacts, risks and opportunities related to working conditions, organizational culture, dialogue, work-life balance, health and safety, diversity, equality and inclusion, the rejection of violence and harassment, talent development and training, privacy and the prohibition of child and forced labor.

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The prevention and anticipation of any risk associated with human rights is carried out by the Senior Leadership and those responsible for each of the respective functional areas, following the processes set out in the policy that applies to all staff, positions, departments, committees and organizational units. In addition, a continuous process of due diligence is also carried out on its own activities and those directly related to its operations and services rendered, with the objective of respecting and not violating the rights of the actors involved.

### **5.2.3. Processes for engaging with own workers and workers' representatives, collective bargaining and social dialogue**

With regards to employee participation and consultation, Almirall not only scrupulously complies with the commitments acquired in the different negotiation frameworks in each territory (for example, in Spain, the 21st General Chemical Industry Agreement), but also goes one step further by promoting its continuous improvement system. This is done through committees within the organization that address key issues in the company, such as benefits, equality, occupational health and safety, or any other issues that may affect the day-to-day work of company employees.

As a result of this dialogue, the company and workers' representatives reach whatever agreements are necessary in order to achieve the continuous improvement and well-being of everyone at Almirall.

The dialogue with workers' representatives is coordinated under the responsibility of the Senior Director of Global C&B, Labor Relations & People Administration, and a unified response is given to any queries or concerns they may have. At the local level, it is the local People & Culture officers who are responsible for the dialogue on issues that may affect the day-to-day running of the organization.

Ensuring respect for stakeholders, consisting of workers' representatives from the respective workplaces, chosen from among the workforce in union elections, as well as members of the company's management and the People & Culture area.

Every two years, a general follow-up meeting is held between the legal representatives of the workers in the different workplaces and the company's management, represented by the Chief People Officer and the Senior Director of Global C&B, Labor Relations & People Administration.

In Spain, there are several monitoring committees for strategic issues within the organization. These committees present, discuss and propose improvements and changes to be applied both in Spain and in the Group's subsidiaries, if applicable.

#### **Benefit Committees**

One of these is the Benefits Committee in Spain, which performs an ongoing analysis of the social benefits existing in the company, proposing different actions for improvement as well as evaluating already-existing benefits. This Committee meets every six-months or on an ad hoc basis, if necessary.

#### **Working Time Records and Teleworking Committee**

The working time records committee oversees the compliance with and monitoring of the working time records regulations, taking into account the particular characteristics of each work center and community, as well as the implementation of the teleworking or hybrid work models. This committee meets every six months or on an *ad hoc* basis if necessary, monitoring the different set KPIs, as well as the development of their implementation in the different areas of the company.

#### **Equality Committee**

The Equality Committee, which is made up of equal numbers of company and employee representatives, closely monitors the situation of those groups that may be particularly vulnerable to suffering unequal treatment, such as women workers and other groups at higher risk. The Equality Committee meets on a quarterly basis to review the progress of the actions established in the current Equality Plan, as well as any new initiatives that may arise from the company or from workers' representatives.

#### **Collective bargaining and dialogue**

Almirall has legal representatives for employees at all its main work centers. Due to the company's presence in several countries of the European Union, in 2019 the European Works Council was set up, and during the year it holds two ordinary meetings, where issues of common and cross-cutting interest for several countries are addressed. These include the status of production in the company's plants, news on R&D, updates on occupational health and safety, improvements and new developments in computer applications, latest acquisitions and the economic situation of the Group and anticipated headcounts by country, and the results of the culture survey. At the same time, all initiatives or actions that may have an impact on more than one country are discussed on an extraordinary basis. Participating in this European Committee are workers as

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representatives of the workforces in their countries of origin, on the one hand, and the C&B, Labor Relations & People Administration, representing the company, on the other hand.

The company applies the state and labor legislation of each country in which it has employees, but in addition, in Spain, Italy, France, Austria, Belgium and Portugal, employees with employment contracts are also covered by the corresponding collective bargaining agreement (i.e., 69% of the Group's workforce). However, those more beneficial agreements agreed within the framework of collective bargaining of the European Works Council are extended to all employees in Europe.

A breakdown of staff under collective bargaining agreements in the main geographical areas is set out below:

Coverage rate	Collective bargaining coverage		Social dialogue
	Employees - EEA	Employees - Non EEA	Representation in the workplace
0 - 19%	-	-	-
20 - 39%	-	-	-
40 - 59%	-	-	-
60 - 79%	-	-	-
80 -100%	Spain, Germany, Italy; France	-	Spain, Germany, Italy; France

Table 39 Information on the coverage of collective bargaining and social dialogue:

#### 5.2.4. Processes to remediate negative impacts and channels for own workers to raise concerns

Almirall has whistleblowing channels available to all workers, through which they can report any action that they believe constitutes or may constitute or result in a human rights violation.

During 2024, no human rights complaints have been received. If any, the Group has identified a series of protocols and actions, including the Protocol against Psychosocial harassment and the Protocol against Sexual or Gender-Based Harassment.

It is important to highlight the existence of the internal SpeakUp! channel, designed to receive reports, complaints or suggestions related to the violation of working conditions, equal opportunities and treatment, harassment, bribery, fraud, corruption or other conduct that is not in line with the Code of Ethics. For more information, chapter 5.2.14 "Safety, health and wellbeing", provides details on managing the negative impacts on the health, safety and well-being of workers. Similarly, chapter 5.2.4 "Processes to remediate negative impacts and channels for own workers to raise concerns" deals with this subject in depth. Finally, chapter 2.2.4 "Prevention and detection of corruption or bribery" explains how Almirall staff can report any incident of corruption or bribery.

It is a channel available 24/7 on the intranet for all employees, which allows interaction in all languages and countries present in the company, as well as the possibility of filing an anonymous complaint. SpeakUp! guarantees the privacy of all the information collected in the channel, in accordance with EU guidelines. Any complaint filed initiates an investigation process carried out by internal people from People & Culture and Global Compliance & Privacy or external specialists in the matter, guaranteeing that no reprisals will be taken against the complainant.

The existence of these reporting tools is widely known and, as they can be used by any worker, they represent an excellent mechanism for ensuring compliance with human rights at all levels.

Complaints are tracked and monitored to ensure the effectiveness of communication channels. Within seven calendar days of receiving a complaint, the SpeakUp! Program Manager will send an acknowledgement of receipt to the complainant, provided that he/she has provided an address, email or other means of contact. The acknowledgement of receipt shall include information on external channels for making complaints to the relevant local competent authorities and, where necessary, the competent institutions, bodies, offices or agencies. The acknowledgement of receipt shall also contain information on the processing of the complainant's personal data, in accordance with the applicable privacy regulations.

The internal investigation process shall not exceed a period of three months from the sending of the acknowledgement of receipt to the complainant. Upon completion of the investigation, the SpeakUp! manager

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will issue a resolution indicating the actions taken and conclusions reached. If necessary, the person responsible for SpeakUp! will propose corrective action(s).

The whistleblowing channels are highly useful because, in addition to bringing possible violations of fundamental rights to Almirall's attention, they also allow the company to combat the violations and act proactively to prevent potential violations, thereby ensuring that human rights are promoted and respected. These channels, specifically the mechanisms for reporting and protection against any situation of discrimination and/or harassment, have been established with the participation of the legal representation of employees, to cover any situation of possible discrimination in any field, whether gender, origin, sexual orientation, age, religion or any other individual condition.

In turn, the existence of protocols to deal with situations of harassment and/or discrimination of any kind guarantees that, in the event of a report or suspicion of one of these circumstances, the company has a procedure in place to identify, mitigate, correct and, if possible, prevent future occurrences.

Metrics are reported in section 5.2.17 "Human Rights Incidents and Complaints". Below is a description of the existing protocols for some of the most sensitive situations to which some of the Group's employees may be exposed.

### **Protocol against Psychological Harassment in the Workplace**

Psychological harassment in the workplace is considered a significant risk for workers. According to Law 31/1995 on Occupational Risk Prevention, it recognizes the right of workers to receive protection in terms of health and safety at work, which means that Almirall has the duty to prevent these situations.

This protocol, in force since February 2023, is applicable to all Almirall personnel, including cases where only one of the parties involved is a company employee.

Preventive measures will be implemented to avoid the occurrence of psychological harassment in the work environment. It also establishes a procedure for dealing with this type of harassment, including clear principles and guidelines for dealing with it.

### **Protocol against Sexual Harassment or Gender-Based Harassment in the Workplace**

With the aim of preventing situations of sexual and/or gender-based harassment in the workplace, as well as establishing mechanisms for the resolution of complaints, this protocol guarantees the health and integrity of all persons involved, both physically and psychologically, and is committed to eradicating any form of discrimination. It should be noted that this procedure is internal to the company and does not exclude or restrict any legal action that the persons concerned may take.

Updated in 2023, the protocol sets out the principles that should guide any action during the procedure, including the process of reporting harassment and its resolution. It also identifies those who report harassment and describes the roles and responsibilities of the Equality Committee.

### **Protocol on the Protection of Women in Situations of Gender Violence**

Approved in 2023 and in line with the policies for the development and implementation of equality actions, with the aim of strengthening its commitment in this area, Almirall presents this tool for addressing gender violence. As a social agent, the company recognizes its role and responsibility in society and establishes this protocol to provide comprehensive care and support to women who suffer violence, as well as to prevent such cases by raising awareness and disseminating appropriate information.

The basic principles to be considered when dealing with situations of gender-based violence are defined within this framework. Preventive measures and a procedure for activating the rights of the women concerned are also established, setting out in detail the different phases of this process.

### **5.2.5. Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions**

See reference to the actions relating to own workforce through which Almirall ensures that its own activities do not have a negative impact on the workforce in the following sections: 5.2.8 "Employee satisfaction and engagement (turnover and absenteeism rates)", 5.2.10 "Diversity and inclusion", 5.2.11 "Adequate wages", 5.2.12 "Social protection", 5.2.13 "Talent development and training", 5.2.14 "Safety, health and wellbeing", 5.2.15 "Work-life balance" and 5.2.17 "Human Rights Incidents and Complaints".

With regards to actions related to the promotion of Diversity, Equity and Inclusion, the Group's Equality Plan, agreed with the Legal Representation of Workers, guarantees the company's commitment to establishing policies that ensure equal treatment and equal opportunities for women and men at all levels of the organization.

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Currently, this Plan is only in force for Spain, although some of the actions (increasing the presence of women in leadership positions, training campaigns, visualization or remuneration policies) will be extended to other geographies. Over these years, most of the actions foreseen in the Equality Plan have been carried out, reinforcing the Company's message and commitment, highlighting legal compliance actions (wage registers, audits, protocols, etc.), as well as training and visibility actions (new e-learning training and awareness campaigns in areas such as family co-responsibility or awareness of gender violence). Details of the measurable targets are set out in the following section.

Finally, information on current and future financial resources or on other resources allocated to the action plan is not reported, as this is not material, in any case, in relation to the Group's budgets.

### 5.2.6. Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

The setting of objectives and metrics is crucial for Almirall, as it allows it to accurately assess and measure its progress towards goals related to the working conditions, equal treatment and opportunities and human rights of its own staff. The workers are involved in the process of defining these, through their participation in the European Committee. These elements provide a solid structure for monitoring the effectiveness of Almirall's policies, actions and strategies for managing material risks and impacts, thus ensuring greater transparency and accountability in its corporate performance.

Section 3.1.4 "Sustainability and ESG goals" describes the sustainability objectives in relation to people as well as the associated projects and initiatives.

### 5.2.7. Workforce profile

At the close of the 2024 financial year, Almirall had a total of 2,026 employees from 40 nationalities, 46% of whom are men and 54% women. The average length of employment is 11 years and 73% of our employees have a university degree.

The method used to collect the information was as follows:

Almirall has a global human resources information system from which all information concerning the workforce is extracted. From this a year-end report is extracted of the total number of active employed persons regardless of location or type of contract, based upon which all information related to the workforce profile is prepared.

Almirall's workers are concentrated in Europe (96%) and the United States (4%). The information by professional category is divided into Directors (6%), Middle Management (10%), Specialists/Professionals (58%) and Administrative/Manual Workers (26%). The age distribution of Almirall's workforce is as follows: 7% are under 30 years of age, 52% are between 30 and 50, and 41% are over 50 years of age.

Of the total number of workers in Senior Management<sup>6</sup> at 31 December 2024, 2 are women (22%).

Country	31/12/2023					31/12/2024				
	Women	Men	Others	Not declared	Total	Women	Men	Others	Not declared	Total
Spain	652	608	0	0	1,260	686	640	0	0	1,326
Germany	169	144	0	0	313	191	150	0	0	341
United States	50	33	0	0	83	53	30	0	0	83
Italy	44	43	0	0	87	51	50	0	0	101
United Kingdom	19	11	0	0	30	19	11	0	0	30
Switzerland	12	4	0	0	16	10	6	0	0	16
Netherlands	7	3	0	0	10	8	2	0	0	10
Austria	7	6	0	0	13	9	7	0	0	16
Belgium	8	6	0	0	14	9	6	0	0	15
Nordic countries	9	6	0	0	15	8	6	0	0	14
Portugal	8	2	0	0	10	8	3	0	0	11
Poland	6	1	0	0	7	6	1	0	0	7
France	23	14	0	0	37	29	17	0	0	46
China	1	0	0	0	1	1		0	0	1
Czech Republic	5	2	0	0	7	5	3	0	0	8
Slovak Republic	1	0	0	0	1	1		0	0	1
<b>Group Total</b>	<b>1,021</b>	<b>883</b>	<b>0</b>	<b>0</b>	<b>1,904</b>	<b>1,094</b>	<b>932</b>	<b>0</b>	<b>0</b>	<b>2,026</b>

Table 40 Breakdown of employees by gender and geography

<sup>6</sup> Senior Management refers to the people that make up the Management Board



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There are currently no non-guaranteed hours employees. The year-end distribution of contracts by duration (indefinite/permanent or temporary), age, professional category and gender is as follows:

Type of contract	31/12/2023					31/12/2024				
	Women	Men	Others	Not declared	Total	Women	Men	Others	Not declared	Total
Full-time permanent	961	859	0	0	1,820	1,051	904	0	0	1,955
Part-time permanent	32	8	0	0	40	20	11	0	0	31
Full-time temporary	25	14	0	0	39	19	16	0	0	35
Part-time temporary	3	2	0	0	5	4	1	0	0	5
<b>Group Total</b>	<b>1,021</b>	<b>883</b>	<b>0</b>	<b>0</b>	<b>1,904</b>	<b>1,094</b>	<b>932</b>	<b>0</b>	<b>0</b>	<b>2,026</b>

Table 41 Breakdown of employees by type of contract and gender

Country	31/12/2023					31/12/2024				
	Full-time permanent	Part-time permanent	Full-time temporary	Part-time temporary	Total	Full-time permanent	Part-time permanent	Full-time temporary	Part-time temporary	Total
Spain	1,207	27	26	0	1,260	1,293	8	25	0	1,326
Germany	290	9	9	5	313	307	22	7	5	341
US	83	0	0	0	83	83	0	0	0	83
Italy	85	0	2	0	87	100	0	1	0	101
United Kingdom	29	1	0	0	30	29	1	0	0	30
Switzerland	13	3	0	0	16	16	0	0	0	16
Netherlands	8	0	2	0	10	9	0	1	0	10
Austria	13	0	0	0	13	16	0	0	0	16
Belgium	14	0	0	0	14	15	0	0	0	15
Nordic countries	15	0	0	0	15	14	0	0	0	14
Portugal	10	0	0	0	10	11	0	0	0	11
Poland	7	0	0	0	7	6	0	1	0	7
France	37	0	0	0	37	46	0	0	0	46
China	1	0	0	0	1	1	0	0	0	1
Czech Republic	7	0	0	0	7	8	0	0	0	8
Slovak Republic	1	0	0	0	1	1	0	0	0	1
<b>Group Total</b>	<b>1,820</b>	<b>40</b>	<b>39</b>	<b>5</b>	<b>1,904</b>	<b>1,955</b>	<b>31</b>	<b>35</b>	<b>5</b>	<b>2,026</b>

Table 42 Breakdown of employees by type of contract and geographical area

As set out in detail in Note 22 of the Notes to the Consolidated Annual Accounts of the Group at the end of December 2024, the list of employees broken down by professional category and gender is as follows:

Professional category	31/12/2023			31/12/2024		
	Women	Men	Total	Women	Men	Total
Directors	41	63	104	45	67	112
Middle management	89	101	190	98	106	204
Specialists / Professionals	605	454	1059	688	488	1176
Administrative/Manual Workers	286	265	551	263	271	534
<b>Group Total</b>	<b>1,021</b>	<b>883</b>	<b>1,904</b>	<b>1,094</b>	<b>932</b>	<b>2,026</b>

Table 43 Breakdown of employees by category and gender (the category "Other" and "Undeclared" are not shown because all amounts are zero)

The following table shows the breakdown by gender within each professional category as a percentage of the total of the category. The increase of 1 percentage point of women in the category of middle management compared to the previous year is noteworthy, bringing us gradually closer to parity in this segment. Of the remaining categories, in Specialists/Professionals women are up two points and in Administrative/Manual Workers they are down 3 points.

Professional category	31/12/2023		31/12/2024	
	Women	Men	Women	Men
Directors	4.1%	7.1%	4.5%	6.7%
Middle management	4.9%	11.3%	5.4%	10.6%
Specialists / Professionals	33.2%	24.6%	36.1%	25.1%
Administrative/Manual Workers	14.6%	13.9%	12.5%	13.4%

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Directors	40%	60%	40%	60%
Middle management	47%	53%	48%	52%
Specialists / Professionals	57%	43%	59%	41%
Administrative/Manual Workers	52%	48%	49%	51%
<b>Group Total</b>	<b>54%</b>	<b>46%</b>	<b>54%</b>	<b>46%</b>

Table 44 Breakdown of employees by category and gender in % (the category "Other" and "Undeclared" are not shown because all amounts are zero)

Additional indicators on the breakdown of workforce by professional category, age and gender are included in section 7.1 "Other social indicators".

## 5.2.8. Employee satisfaction and engagement (turnover and absenteeism rates)

### Corporate volunteering

At Almirall, we channel the spirit of solidarity and encourage staff participation in social projects through a global corporate volunteering program designed in 2024, which will start in 2025. Aligned with the company's values and purpose, as well as with the sustainability policy, it includes social team-building activities that the company's areas and departments can carry out in collaboration with Fundación Àurea and other selected entities, as well as an individual volunteering day (8 hours) that staff can dedicate to approved organizations, selected from a regularly updated catalogue. This global program will start to be implemented in 2025 and will be progressively adapted locally in the subsidiaries.

As an example, this year the Sustainability Committee participated in a team-building activity with a positive environmental and social purpose and impact. To this end, we collaborated once again with Fundación Àurea and Fundación Espigoladors, to learn first-hand about the work they carry out. The Sustainability Committee had the opportunity to learn about the *Alimentos Solidarios* [Solidarity Food] project, which makes it possible for hundreds of families in vulnerable situations to eat healthily every week, while at the same time helping to reduce food waste, protect the environment and contribute to labor insertion. To this end, the members of the Committee participated, together with Fundación Espigoladors, in a harvest that prevented the waste of more than 450 kg of vegetables.

Almirall's corporate volunteering program not only reinforces its commitment to society, but also increases the workforce's sense of belonging and commitment to the company. It also fosters internal cohesion and develops skills and capacities essential for the social commitment, such as collaboration, teamwork, solidarity and empathy. As and when the program is rolled out in all the subsidiaries, we expect to see a significant positive impact on both communities and the workforce.

### Staff turnover

Below is a breakdown of layoffs by country and gender, taking into account all layoffs regardless of the reason (voluntary and involuntary). The figures reported correspond to people who have an employment contract with any Group company and whose leaving date is between the first and last day of the year.

Country	2023			2024		
	Women	Men	Total	Women	Men	Total
Spain	69	55	124	52	51	103
Germany	13	16	29	32	18	50
United States	18	21	39	11	10	21
Italy	4	1	5	4	6	10
United Kingdom	7	7	14	3	6	9
Switzerland	1	1	2	5	1	6
Netherlands	3	0	3	2	0	2
Austria	2	0	2	2	1	3
Belgium	0	1	1	1	2	3
Nordic countries	2	1	3	1	0	1
Portugal	1	0	1	1	0	1
Poland	0	1	1	1	0	1
France	4	2	6	5	0	5
China	1	0	1	0	0	0
Czech Republic and Slovakia	1	0	1	2	0	2
<b>Group Total</b>	<b>126</b>	<b>106</b>	<b>232</b>	<b>122</b>	<b>95</b>	<b>217</b>

Table 45 Total Almirall layoffs by country and gender

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The table below shows the same % of turnover out of the total for each geographical area, divided between total turnover and unwanted turnover (in other words, voluntary departures).

Country	2023		2024	
	Total turnover	Unwanted turnover	Total turnover	Unwanted turnover
Spain	7.4%	1.6%	5.9%	1.1%
Germany	8.1%	1.3%	10.4%	1.2%
United States	42.2%	5.3%	26.1%	8.7%
Italy	6.1%	0%	9.3%	4.1%
United Kingdom	33.4%	0%	35.5%	3.5%
Switzerland	11.7%	5.8%	35.5%	5.9%
Netherlands	17.1%	0%	21.2%	0%
Austria	13.9%	13.9%	19.1%	6.4%
Belgium	7.3%	0%	20.8%	0%
Nordic countries	9.2%	9.2%	6.9%	0%
Portugal	10.2%	0%	9.1%	0%
Poland	17.1%	0%	13.8%	0%
France	13.8%	0%	12.4%	7.4%
Czech Republic and Slovakia	13.5%	0%	23.3%	11.7%
<b>Group Total</b>	<b>10.1%</b>	<b>1.8%</b>	<b>8.9%</b>	<b>1.8%</b>

Table 46 Almirall staff turnover

The turnover rate was calculated by dividing the number of departures with permanent contracts by the average number of employees in each country during the year of calculation. The company understands as undesired turnover that which considers the layoffs that have had a negative impact on Almirall.

Since 2023, and in order to monitor monthly turnover in the company, a dashboard has been used that includes the % of (total and unwanted) turnover, benefiting us by providing a unified calculation for all countries in the same tool.

### Absenteeism

Absenteeism data corresponds to the hours of absence recorded for reasons of sickness and/or occupational accidents for the financial years 2023 and 2024. The breakdown by country and gender is as follows:

Country/Hours (*)	2023			2024		
	Women	Men	Total	Women	Men	Total
Spain	54,648	24,224	78,872	67,512	34,128	101,640
Germany	9,264	8,520	17,784	8,896	9,976	18,872
Italy	504	816	1,320	456	312	768
United Kingdom	1,995	270	2,265	1,043	8	1,050
Switzerland	274	83	357	755	100	855
Netherlands	2,520	128	2,648	416	0	416
Austria	862	239	1,101	285	123	408
Belgium	480	15	495	975	53	1,028
France	1,547	189	1,736	4,984	1,981	6,965
<b>Total Group Hours</b>	<b>72,094</b>	<b>34,484</b>	<b>106,578</b>	<b>85,322</b>	<b>46,681</b>	<b>132,002</b>
<b>% Absenteeism</b>			<b>3.0%</b>			<b>3.4%</b>

Table 47 Absenteeism by country and gender

(\*) Absence hours are not reported in the USA since local legislation does not allow them to be recorded. Nor are they reported for geographical areas with less than 15 workers on average (Netherlands, Czech Republic, Nordic countries, China, Portugal, Poland)

Absenteeism is monitored by means of a quarterly dashboard that includes the % of absenteeism (men/women) in a uniform way for all geographies.

### 5.2.9. Non-employees

Non-employees are considered to be all members of Almirall's workforce who provide services directly, regardless of their contractual relationship with the company. This includes, for example, individual contractors who contribute their labor, people employed by companies specializing in the provision of labor-related services, such as temporary employment agencies, as well as students on work placements.

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At the time of writing, Almirall is working on the collection and incorporation of this data so that it can be included in coming years into the tables corresponding to disclosure requirements S1-13 and DP 84.

The management of non-employees is managed locally from each of the subsidiaries in which Almirall has a direct presence, and covers the different local requirements, mainly in terms of H&S. To date, we do not have a corporate tool enabling us to monitor these people in an aggregated manner.

Work has already begun to have a tool in place by 2025 that, among other functions, will enable us to monitor these staff globally, as well as a working guide to ensure that all non-employees linked to Almirall are covered by the same criteria.

### 5.2.10. Diversity and inclusion

Almirall's success is based on the knowledge, participation and engagement of its workforce. The company has recently launched a Diversity and Inclusion Program to highlight diversity and promote an inclusive work culture. Almirall currently employs professionals of 28 different nationalities and 53% of its workforce are women.

For more details of Almirall's commitments to diversity and inclusion, see section 5.2.2 "Policies related to own workforce" of this report. More details on the Equality Plan in terms of wages are provided in section 5.2.11 "Adequate wages" of this report.

The breakdown of the company's total employees by age range and gender in number and percentage is presented below:

Age	31/12/2023			31/12/2024		
	Women	Men	Total	Women	Men	Total
< 30	73	65	138	75	71	146
30 - 50	557	407	964	605	452	1057
> 50	391	411	802	414	409	823
<b>Group Total</b>	<b>1,021</b>	<b>883</b>	<b>1,904</b>	<b>1,094</b>	<b>932</b>	<b>2,026</b>

Table 48 Breakdown of workforce by age and gender

Age	31/12/2023		31/12/2024	
	Women	Men	Women	Men
< 30	53%	47%	51%	49%
30 – 50	58%	42%	57%	43%
> 50	49%	51%	50%	50%
<b>Group Total</b>	<b>54%</b>	<b>46%</b>	<b>54%</b>	<b>46%</b>

Table 49 Breakdown of employees by age and gender %

### Equality Plan 2021- 2024

The Equality Plan in Spain, the first of which was signed in May 2009, aims to continue advancing equal opportunities regardless of gender. The aim is to implement actions to prevent any form of gender discrimination, whether direct or indirect, at Almirall. These actions are integrated into all areas where the company operates, and monitoring systems are set up to ensure compliance with the plan in the long term.

Under the supervision of the Chief People & Culture Officer, the plan aims to achieve real gender equality in the company, whilst also contributing to this goal in society in general.

In order to give continuity to the actions included in the previous plan, the need to negotiate a new one was established, which was approved in February 2020 for a period of four years. This plan was negotiated and agreed by the Equality Negotiating Committee, set up in 2019, which is responsible for monitoring and assessing compliance with the equality actions agreed with Almirall.

The actions contemplated in this plan apply to all personnel of the Almirall Group companies in Spain, as well as to workers who provide services through Temporary Employment Agencies in these companies.

As of next year, there will be a new Equality Plan that will be applicable for the next four years, 2025-2028, to which a minimum of 15,000 euros will be allocated for the adoption of these new actions during the year 2025.

The evaluation of the 2021-2024 Equal Opportunities Plan has revealed a positive trend towards equal opportunities and non-discrimination on the grounds of sex. The main qualitative results of this evaluation are as follows:

- **In the area of access to employment: selection and hiring:** Of all new hires in the last 4 years, 55% have been women compared to 45% who have been men, with a higher rate of hiring in corporate teams and sales networks. In industrial sites, on the other hand, most new hires have been men.

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- **In the area of professional classification and promotion:** Following the job evaluation methodology, each new position is defined within the current job map, eliminating factors that correspond to stereotypes and gender roles. In the area of promotion, this commitment is demonstrated by a higher rate of female promotion in Senior Leadership positions (grade 11 and above) (10 women and 5 men promoted in recent years).
- **In the area of communication:** The inclusive language manual has been developed and published, along with the corresponding training, and a significant change is being observed in the communications made.
- **Labor conditions:** As a minimum, the conditions set out in the General Collective Bargaining Agreement for the Chemical Industry apply, and are improved on through agreements with the legal representation of workers.
- **In the area of remuneration:** Work has been ongoing to ensure that the wage review process complies with the principle of non-discrimination on the grounds of gender. Remuneration records are kept in order to see the pay gap between positions of equal value and to define actions, in addition to carrying out wage audits, obtaining a favorable result that verifies there is a remuneration practice that is not gender-biased.
- **In the area of work-life balance:** Actions have been implemented in relation to flexible working hours, establishing a timetable for on-site working, working on the smart meetings project and achieving a hybrid work model, as well as legally extended measures in terms of breastfeeding, childcare and paid leave for parents in cases of birth, adoption or dependents.
- **In the area of awareness-raising and training:** New training courses have been added to the existing ones on equality and diversity, such as "communication and inclusive language" and "prevention and intervention against sexual harassment", the latter being run in-person at the pharmaceutical and chemical plants. Furthermore, awareness-raising campaigns have been carried out on family co-responsibility, women's health and various actions for the international days of 11 February, 8 March and 25 November.
- **In the area of prevention of sexual harassment and gender-based violence:** Specific measures have been put in place, including a protocol for dealing with sexual harassment and gender-based violence, which is periodically reviewed to ensure that it is functioning correctly; the corresponding training and webinars are also offered.

In general terms, the objectives set out in the 2021-2024 Equality Plan have been satisfactorily achieved, with most of the actions having been successfully implemented. With a view to next year, a new diagnosis will be carried out to ascertain the company's situation and to continue working on the eradication of any inequalities in treatment or opportunities that have no objective justification.

### ***Inclusive Language Manual***

In order to ensure equal opportunities, regardless of gender, in the workplace, and with the conclusions of the diagnosis of the Equality Plan, this guide, in force since March 2023, promotes the use of inclusive language. It aims to provide a communication strategy that applies to internal and external processes, ensuring equal treatment and opportunities for all employees.

This manual seeks to avoid expressions with negative connotations and those that perpetuate gender stereotypes, as well as the use of the generic masculine and terms that may be falsely inclusive.

It also addresses the use of images, ensuring that all images reflect equality between women and men. Examples and good practices are also included that illustrate these concepts.

The alternatives proposed throughout the manual are simple and easy to implement in everyday life, and represent a transformative effort both for the internal reality of the company and its members and for the image we project externally.

An e-learning course with the main content of the inclusive language manual is also offered, which is mandatory for people with an impact on communications on the intranet.

A significant change has been appreciated in the communications made by the organization following the adoption of these actions, always using inclusive language.

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### Employment and inclusion of people with functional diversity

Almirall is highly committed to employing people with disabilities. At present, there are different collaboration agreements in effect with different Special Work Sites, Entities and Foundations, and we also work proactively to promote and/or facilitate the hiring and integration of this group.

In accordance with the main general legal provisions in force intended to address the rights of people with functional diversity, Almirall meets the compliance requirements through the reserve quotas established by law in each of the countries where it has a work center, or through exception certificates and according to the different circumstances that arise in the Group's companies.

With regards to the measures to guarantee universal access for people with any type of functional diversity in workplaces in Spain, those buildings with building permits prior to 12 September 2010 must adapt to the current regulations whenever extension, modification, reform or rehabilitation works are carried out (in accordance with the Third Transitional Provision of Spanish Royal Decree 173/2010, of 19 February).

With regards to the Sant Andreu de la Barca center (Pharmaceutical Production), this site complies with the regulations applicable at the date of construction and has been brought into line with current regulations in those areas where there has been a refurbishment. Specifically, when the offices were refurbished as part of the "Flexible Work Place" project in 2018, they were brought into line with the regulations in force at the time. As regards the chemical production building, it complies with the regulations applicable at the date of construction. A refurbishment according to the "Flexible Workplace" project is planned for 2026 and the offices will be made suitable for people with reduced mobility.

The Sant Feliu de Llobregat Center (R&D Site) complies with the regulations applicable at the date of construction and has been brought into line with current regulations in those areas where there has been a refurbishment. In particular, the D building (administrative building) is currently being refurbished and will be brought up to current standards.

At the Headquarters (Ronda General Mitre), although it complies with the regulations applicable at the date of construction, an analysis and planning of works has been carried out in order to voluntarily adapt to current regulations. These works to enable the normal operation of the building are planned in 5 phases, the first of which will begin in 2026. Finally, at the Sant Celoni and Sant Andreu de la Barca chemical plants, the analysis of the works required to bring them into full compliance with current regulations is expected to begin shortly.

Finally, at the Sant Celoni chemical plant, the building complies with the regulations applicable at the date of construction. A refurbishment according to the "Flexible Workplace" project is planned for 2027 and the offices will be made suitable for people with reduced mobility.

The Group employs the following collective with an accredited degree of functional diversity, together with their percentage compared to the Group's total number of employees:

	2022 <sup>(1)</sup>	2023 <sup>(1)</sup>	2024 <sup>(1)</sup>
Total functional diversity personnel	37	36	40
Women	26	25	23
Men	11	11	17
% of Group total	2.0%	1.9%	2.0%

Table 50 Workforce with functional diversity

(1) Information from the US subsidiary is not available due to data privacy regulations.

#### 5.2.11. Adequate wages

Almirall's compensation programs pursue a culture of high performance, with compensation and benefit plans based on external competitiveness and internal equity according to the level of contribution by the job position held and the performance of each employee. Sector wages are continuously analyzed in order to remain competitive in each and every market in which we operate and to offer attractive social benefits that are aligned with local practices. In turn, both the unadjusted and adjusted gender pay gap is calculated annually, and the results are made transparent in the annual Sustainability Report. The calculation of the pay gap is explained in section 5.2.16 "Pay Equity Criteria and Pay Gap at Almirall".

There is a firm commitment to gender pay equity, which is reflected in the ESG objectives, as well as to guaranteeing a decent and adequate wage in each and every country where Almirall operates.

The principles of Almirall's Compensation Policy, inspired by the company's values, govern compensation and benefits activities and, as a result, compensation decisions:

- **Fairness:** compensation programs are designed to ensure fairness and equity.

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- **Competitiveness and commitment:** Almirall offers a competitive and relevant compensation package to all the company's employees, recognizing their role and contribution, taking into account the external market and performance.

Currently, salary bands are based on Willis Towers Watson salary surveys of the pharmaceutical sector for each of the countries where Almirall has a presence. Also, in Spain, salaries are linked to the collective bargaining agreement of the Chemical Industry, affecting 94% of the workforce in Spain. Senior Leadership - grade 11+, is excluded from this regulation.

For the rest of the workers, located in other countries, the salary bands are above the minimums established by local Collective Agreements. Salary bands are updated regularly to keep pace with inflation increases in the markets where Almirall competes.

Almirall employees are offered the opportunity to contribute to the future success of the company regardless of where they are located within the organization. The focus is on performance to achieve the goals and behaviors necessary to achieve positive outcomes for the Company and for our patients.

The different remuneration packages or compensation programs are designed to be understandable and simple. The same principles are applied consistently under the same framework and governance. Just as there are different roles within Almirall, we recognize that the markets where we compete are different and the compensation packages vary, taking into account local relevance, but also without losing global consistency.

In 2022, the organizational structure of job positions was reviewed under the Equal project, the main objective of which was to establish a solid foundation on which the Compensation and Benefits strategy and some of the key People & Culture processes are linked. This structure is based on a Global Job Map of the company along with its governance and job titles associated with each grade (level of contribution within Almirall). As a basis for transparency, each employee was informed of the grade (contribution level) and title of their position according to the new policy. The next step of this project was to create standardized salary structures by region and level of contribution, to review short-term incentives and the compensation policies in order to link them to this structure.

This project for the correct valuation of jobs is in line with the new legislation in Spain (Royal Decree 902/2020) on equal pay for men and women, and is further evidence of the company's commitment to equality. This commitment is also demonstrated in the Equality Plan that Almirall has had in place since 2009, updated in 2020, as well as in the appointment of an equality agent who will monitor all the positive actions proposed within it.

The objectives of the plan include promoting and improving access to senior positions by women, as well as preventing discrimination in hiring and gender-based pay.

Almirall regularly analyses the valuation of the different job positions, as well as the performance of each person, in order to recognize the performance of each one of them through the annual salary increase process. In addition, the various benefit programs allow employees to tailor their compensation package to the specific needs of each individual and their families.

#### **5.2.12. Social protection**

All Almirall employees have social protection, either through public schemes in their respective countries or also, in a complementary manner, through different mechanisms (supplementary benefits, social benefits, etc.). These mechanisms are intended to protect the loss of income arising from specific situations such as illness, accident, unemployment, childbirth leave or retirement. These benefits are aligned with the local legislation and practices in each country where the company operates.

The following table shows the casuistry for each country, according to each situation:

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Social Protection	Sickness		Unemployment		Accident at work		Parental Leave		Retirement	
	State Protection	Company social benefits	State Protection	Company social benefits	State Protection	Company social benefits	State Protection	Company social benefits	State Protection	Company social benefits
Spain	X	X	X		X	X	X	X	X	X
Germany	X	X	X		X		X		X	
United States		X	X		X	X		X	X	X
Italy	X		X		X		X		X	
United Kingdom	X		X		X		X		X	
Switzerland		X	X		X		X		X	
Netherlands	X	X	X		X		X		X	
Austria	X	X	X		X	X	X		X	X
Belgium	X	X	X		X				X	
Denmark	X	X	X		X		X			
Norway	X		X		X		X			
Sweden	X		X		X		X			
Portugal	X	X	X		X		X		X	
Poland	X	X	X		X		X		X	
France	X	X	X		X		X		X	
China	X		X		X				X	
Czech Republic	X	X	X		X				X	
Slovak Republic	X		X		X				X	

### Social Benefits

Within social benefits, Almirall has several products and services that can be divided into three main groups: well-being, finance and subsidies and prizes.

Those benefits focused on well-being include the payment of a life insurance policy for all internal employees managed by Generali, as well as a private health insurance policy for all employees with permanent contracts. In addition, all Almirall Spain facilities offer a number of initiatives such as a medical service, a gym, a restaurant and free fruit two days a week. We also offer travel insurance for all those people who need to travel.

All financially-related benefits are focused on improving and helping all staff to achieve financial security to the best of each person's capabilities. A flexible compensation plan is offered, including several products that can be contracted (health insurance, life insurance extension, training, transport vouchers, childcare vouchers and a collective savings insurance) as well as an exclusive discount club for the whole group. We also have advantageous agreements with several banks, and a financial well-being plan that gives talks every October to help those interested in improving their finances.

Finally, grants and premiums are also offered to the entire community. Amongst these grants, we would highlight school grants, loans or bonuses for marriage/partnership or birth and adoption, among others. Grants are also offered for the purchase of electric or hybrid vehicles and seniority bonuses are offered for those who have been with the company for more than 10 years.

### 5.2.13. Talent development and training

#### Talent recruitment

Almirall internalized the recruitment model by building a highly skilled team of recruiters who carry out the hiring process from start to finish, from the identification and attraction of passive candidates to the evaluation of these candidates for the different positions. This proactive approach to recruiting ensures the existence of a pool of talented candidates and helps make it simpler to track them and to hire the best candidate for each position.



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In order to increase the company's ability to attract talent, a Referral Program was developed and implemented in May 2017. This program allows workers to recommend their best contacts for Almirall vacancies. As an incentive, if a recommended candidate is ultimately hired, the worker who made the recommendation receives a financial reward. It's a good way of reaching candidates who fit the company's needs in terms of both business and organizational culture, and of encouraging the workers themselves to recommend the company as a good place to work and develop professionally. It also serves as a good letter of introduction that makes highly talented individuals interested in participating in the Group's hiring processes. In the last 4 years of the program, of the selection processes carried out, 34 processes have been filled with referenced applications (7 in 2022, 7 in 2023 and 15 in 2024).

The hiring process is robust and consists of several steps according to the level of the organization. These steps guarantee quality hiring that aligns with Almirall's corporate culture and values.

When it comes to evaluating applications, there are three assessment levels: Basic, Silver and Gold, coordinated by the Global Talent Acquisition team:

- The **Basic** assessment is used when hiring specialists and entry-level positions and consists of a technical screening, a skills-based interview, another technical interview conducted by the leader, a practical job-related test that is optional, and lastly, a language test, plus a reference check.
- The **Silver** assessment is used when hiring for mid-level positions and consists of a technical and motivational screening, a technical interview and another that is skills-based, a case study or presentation on a specific topic, which is obligator, a role-play, a language test and a reference check.
- The **Gold** assessment is used when hiring executive-level positions and consists of a skills-based interview, a case study or presentation on a specific topic, which is obligatory, a role-play, an English test, a reference check and interviews with key stakeholders of the position.

The case study or presentation on a specific topic makes it possible to assess both skills and entrepreneurial vision, communication, influence, innovation and strategic vision. The role-play, on the other hand, makes it possible to evaluate leadership skills and results orientation, among other qualities.

### ***In-house workers are a priority***

When selecting candidates, meritocracy and cultural diversity are advocated in all hiring processes, as diversity and inclusion are part of Almirall's DNA. For example, there are employees of 40 different nationalities, which allows the company, among other things, to be more innovative and productive and to benefit from different points of view that ultimately impact business results.

Furthermore, Almirall firmly believes in giving workers the opportunity to progress in their careers within the company. Thus, whenever a new vacancy is available it is always posted on the internal opportunities portal and a summary of all positions is made on the intranet every 15 days. In this way, priority is given to workers so they can enjoy a long career and professional development within the company.

### ***Key talent management processes***

The annual Performance Appraisal process, referred to internally as GPS (Go, Perform, Succeed) is modern, simple and transparent and adapted to the current and future demands of the work environment. At Almirall it is important not only to achieve the set objectives, but also to do so in a way that promotes our culture and values.

This process is key to ensuring that the workers' objectives are aligned with Almirall's strategy, whilst at the same time fostering professional development through enriching conversations, promoting a culture of continuous feedback and thus reinforcing an environment of mutual trust.

The objectives are set at the beginning of the year and can be both individual and team objectives. Throughout the year, frequent meetings called Continuous Feedback Meetings are held so that workers and their leaders can discuss the progress of their objectives and provide feedback to each other; also, key objectives and behaviors can be adjusted halfway through the year in order to attain them, if deemed necessary. At the end of the year, a formal performance appraisal is conducted which includes a review of the objectives achieved and the behaviors demonstrated in doing so.

This process, especially through the feedback conversations, also enables workers to gain a clearer picture of the personal aspects to be strengthened and developed. Thus, they can set objectives in an individual development action plan agreed with their leader and known internally as MiD (My Development). It is drawn up and regularly reviewed by the worker with the guidance of her/his direct leader, focusing on learning from the defined development actions.

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The number of employees who have taken part in the performance appraisal process (GPS) are listed below:

Category	Gender	2024
Directors	Women	47
	Men	68
Middle management	Women	99
	Men	106
Specialists / Professionals	Women	679
	Men	497
Administrative staff/Workers	Women	300
	Men	280
<b>Group Total</b>	<b>Women</b>	<b>1,125</b>
	<b>Men</b>	<b>951</b>

Table 51 Participation in the performance appraisal process

The annual Talent Review and Succession Planning process is key to identifying critical internal talent, in which the following aspects are analyzed strategically, department by department:

- Business challenges and organizational needs related to the workers.
- Current and future organizational structure.
- Identification of talent with high potential (High Potentials) or who are essential to the company for their knowledge (Exceptional Contributors), as well as emerging talent to continue developing as future high potentials in the organization (Rising Stars). In addition, key talent that has been Recently Promoted is also identified.
- Current and future development plans.
- Succession planning for key positions and possible successors for the future.

### **Training and development plan**

As said above, Almirall's culture is based on corporate values and the Purpose. Therefore, the training and development of workers plays such an important role in daily operations, representing a strategic and priority focus in the company's corporate agenda.

Training and development at Almirall is fundamental to ensuring that employees are prepared and have the necessary tools and skills to give the best of themselves, generating a clear return on investment for the company. Training and development is based on the "70:20:10" learning model, which states that 70% of learning is based on experience, 20% on interaction with peers and 10% on structured training.

The aim of the training and development model at Almirall is to strengthen workers' competences and skills, promoting a culture of continuous learning and development. This approach provides a positive experience, preparing everyone to perform their tasks and achieve objectives efficiently.

### **Training plan**

Each year, an annual online and in-person training plan aligned with Almirall's strategy and values is presented. Each worker adapts this plan to his or her annual development needs, aligning it with his or her individual development action plan, known as MiD (My Development).

The annual training plan aims to offer a variety of training courses, both online and in-person, to help prepare workers for the different stages of their professional careers. This plan is directly aligned with Almirall's strategy and values.

This training plan is presented to the entire company in four categories to facilitate the search for training courses and to organize the offer. These categories are: Culture and Values, Business, Technological Tools and Languages. The training is carried out in different formats to facilitate the participation of employees in them in a flexible way according to their needs: In-person, online, blended and e-learning.

- **Culture and values:** Training focused on developing our associated values and behaviors:
  - o Capacity/skills building: The main purpose of this training is to develop critical skills to ensure the success of Almirall's results, such as feedback, change management, emotional

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management and well-being. In this category, there is also training on how to make the most out of the My Contribution and My Development processes. In 2024, feedback training has been especially promoted under the "Radical Candor" model aligned with Almirall's culture, with the aim of promoting a culture of continuous and transparent feedback.

- This section also includes the critical and essential training that all workers must complete, as these are contents that also have a direct impact on Almirall's culture, such as training on the Code of Ethics and Anti-corruption, Health and Safety or Diversity and Inclusion.
- **Business:** Training focused on developing technical skills and expertise:
  - Functional specialization training: Training focused on increasing the technical and specific skills necessary to fulfil the responsibilities in each of the functional areas of the company. This category contains specific training for finance specialists, product training for sales teams, as well as training related to scientific topics for R&D professionals and the Industrial Operations area, among many others.
  - Technical training for non-experts: Training focused on broadening business knowledge for non-experts, such as, for example, finance for non-financial staff, Almirall strategic products and project management.
- **Technological Tools:** Training focused on developing the technological skills necessary to operate with greater efficiency and agility using the new tools available. Some examples are: Microsoft databases such as tips for working in Excel or Power BI training, as well as those for the Smartworkplace. With this, training sessions have been introduced on key technology tools for today and the future, such as the Teams application and innovative Microsoft Office tools such as digital notebooks, OneDrive and online to-do list management.
- **Languages:** In 2024, Almirall implemented a global language program to foster the development of communication skills in the Company's main languages: English and Spanish. In this program, workers can attend group or individual classes according to their learning needs and objectives. Thus, the company also fosters cooperation among the workers of different subsidiaries. Almirall also has a language program for relocations, so that we can help these workers to adapt by fostering knowledge of the local language.

It should be noted that several of the training courses in the training plan are run by in-house trainers, experts in their area of knowledge. Having in-house trainers has a threefold objective:

- To develop these people in skills that are critical and necessary for sharing their knowledge (presentation, listening, feedback and teaching skills, among others).
- To recognize their knowledge and make it visible to the teams.
- To capitalize on internal knowledge and extend it to the other employees, thus increasing collaboration and synergies between teams.

Finally, shown below are the total number of hours of training provided, the average duration of each training activity, as well as the average number of training hours per worker:

Category	Gender	2022			2023			2024		
		Hours	Average duration of training action	Average hours of training	Hours	Average duration of training action	Average hours of training	Hours	Average duration of training action	Average hours of training
Directors	Women	166	1.7	5.9	1,209	4.5	30.2	993	2.6	24
	Men	413	1.9	7.6	2,219	4.0	34.0	1,217	2.0	19
Middle management	Women	1,399	1.5	14.4	3,540	3.4	39.6	2,826	2.1	30
	Men	1,568	1.4	14.3	3,299	3.0	33.1	3,282	2.3	31
Specialists / Professionals	Women	9,500	1.7	16.0	19,132	2.3	32.1	29,073	2.4	44
	Men	5,674	1.4	12.6	15,181	2.5	33.6	20,041	2.2	42
Administrative staff/Workers	Women	3,471	2.0	13.4	10,324	3.4	36.5	6,732	2.9	24
	Men	4,715	3.5	21.3	7,307	3.0	28.0	7,899	3.9	30
<b>Group Total</b>		<b>26,906</b>	<b>1.8</b>	<b>14.8</b>	<b>62,211</b>	<b>2.8</b>	<b>33.0</b>	<b>72,061</b>	<b>2.5</b>	<b>36</b>

Table 52 Hours of training by category and gender

The variation in the number of training hours shown in 2024 is mostly due to the implementation of the new global language program this year and the mandatory Code of Ethics training. Whilst key initiatives from

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previous years such as "Radical Candor", "Smartworkplace", DAMA, and local job-related technical training have been maintained.

Work is currently underway on a project to transform the strategic training model, which will provide Almirall with a single platform from which workers will be able to consult all the available training and receive training via the platform. This will result in the following:

- Internal functions that manage training will have the opportunity to homogenize a global structure of content, creating topics and programs with clear content, learning communities, and establishing synergies to get closer to the business needs.
- Workers will have access to cutting-edge technology (artificial intelligence) to identify training according to each person's development interests, in addition to the training assigned by the company. It will also further boost the learning culture, democratizing training for workers regardless of their location.

### **Self-knowledge plan**

At Almirall, we offer a self-knowledge program designed to enable employees to identify and understand their strengths and areas for improvement. To do this, we use tools such as Insights, 360 Feedback and Coaching, among other resources, to foster a stronger personal knowledge. These tools not only help workers to become more aware of their capabilities and development opportunities, but also promote an environment of continuous growth and professional improvement.

### **Development plan**

Almirall articulates its offer of development programs for critical internal talent under the nomenclature of KNOWMADS, and there are two types in particular:

**Core programs:** aim to develop key capabilities, promote innovation and entrepreneurial vision, and expand knowledge for critical internal talent. There are 3 types of these:

#### **1) FLOW**

- Audience: *High Potentials* and *Exceptional Contributors* of grade 11 or above.
- Objective: Develop business-critical capabilities.

#### **2) GROW**

- Audience: *Exceptional Contributors* of grades 10 and below.
- Objective: Promote innovation and business vision.

#### **3) GLOW:**

- Audience: *Rising Stars*
- Objective: Expand the acquisition of business knowledge.

**Coaching Program:** Aimed at all groups identified as critical internal talent, this program offers unlimited coaching sessions for a determined period of time, with the objective of strengthening their skills and abilities, facilitating their professional and personal development so that they can contribute significantly to the growth and success of the organization.

As for the training of non-employees, such as students on work placements and external staff, they are evaluated using qualitative processes adapted to their particular situation. For students on work placements, the assessment is carried out by their line managers as part of their training process. On the other hand, consultants are evaluated on the basis of the results obtained in their projects, according to previously established metrics. It should be noted that these groups do not participate in the GPS evaluation processes mentioned above.

### **Recognition of merit (Awards)**

The aim of Almirall's Awards and Recognition Program is to continue driving culture forward, reinforcing achievements consistent with our Purpose and our new values, which are our guide to how we want to engage, collaborate and lead our teams.

The program has four recognition initiatives: Purpose Awards, Values Awards, Contribution Awards and the Bravo Program. The Purpose, Values and Contribution Awards have a monetary prize.

Both the Purpose Awards and the Values Awards have a process for identifying winners each year, and the awards ceremony is held during Almirall's annual Leadership meeting, attended by the company's Top 100

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Leaders. After the ceremony, the winners are shared with the entire organization through our internal channels and are also made public externally so that the recognition of the winners is highly visible.

- **Purpose Awards:** Almirall's teams have the opportunity to present projects that have or have had a significant impact on our Purpose. This not only encourages the initiative to present initiatives, but also the employee's knowledge of the different projects. At the end of the process, the employee votes for his or her favorites.
- **Values Awards:** Everyone at Almirall has the opportunity to identify candidates for this award. It is a highly participatory process, at the end of which the 20 finalists are identified so that employees can vote for their favorites.
- **Contribution Awards:** Each Area and Market Company recognizes exceptional contributions above and beyond their annual targets.
- **Bravo:** Each partner can recognize a colleague for a job well done and/or a collaboration that would not have been possible without his or her help. Bravo helps to reinforce a closer and more emotional connection between Almirall employees and encourages them to continue giving the best of themselves on a daily basis.

#### 5.2.14. Safety, health and wellbeing

##### *Risk management related to the health, safety and well-being of workers*

The prevention and environmental management system is formally implemented and certified at the centers and with the activities indicated above in section 4.1.1 "Occupational Health, Safety and Environment Policy". At international subsidiaries beyond the scope of this certified system, occupational health and safety is managed locally, in accordance with the legal requirements applicable in each case.

At corporate level, Almirall has a Health and Safety Team which reports to the Global Sustainability Executive Director, who in turn reports to the Chief People & Culture Officer. This team has three full-time staff members and is complemented in the different areas and work centers by the participation of other employees with specific functions assigned to management of occupational safety on a part-time basis.

Occupational health and safety is an objective of the company as a whole, and therefore responsibility for achieving it is shared by all Almirall's employees, regardless of their level or role.

Almirall has an integrated occupational health and safety, environmental and energy management system (see section 4.1.2 "Almirall's integrated management system" for further details). Almirall was one of the first companies, in general, and one of the first chemical-pharmaceutical laboratories, in particular, to obtain certification of its system according to the new ISO 45001:2018 standard, which replaces the previous OHSAS 18001:2007, for which it has held certification since 2007. Currently, this certification covers all of Almirall's operational centers and activities in Spain and Germany, representing 82% of the average total number of staff. The remaining 18% corresponds to the commercial subsidiaries in the rest of the countries where Almirall has smaller offices, and where safety management is not certified, but rather the legally required management criteria are applied directly in each case.

With regards to non-employees, the coverage of the management system certified according to ISO 45001:2018 applies equally to 100% of the non-employees at Almirall's operational centers in Spain and Germany. In the rest of the countries where Almirall has work centers, the legally required management criteria are applied directly in each case.

Almirall has a series of established and implemented due diligence processes and procedures that it continuously updates to ensure that the prevention and environmental management system is appropriate, adequate and effective.

In the area of occupational health and safety, several relevant aspects deserve to be highlighted. These include risks and opportunities as well as the occupational risk assessment. Legal and other applicable requirements are also considered. Training is a crucial component, as is the participation of and communication and consultation with workers.

Document management and change control are essential for maintaining the integrity of the system. Priority areas are industrial safety in equipment and installations, together with the control of work with special risks. Attention is also paid to the control of suppliers of works and services and to the road transport of dangerous goods.

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Emergency plans are designed in order to respond effectively to critical situations. Audits and Management's review of the management system ensure continuous improvement. Finally, the management of incidents, non-conformities and corrective actions is fundamental to maintaining a safe and healthy work environment.

In 2024, a number of preventive and health promotion activities for workers were carried out, including the following:

- 4,252 hours of training were delivered, representing a 32% decrease compared to the 6,279 hours in 2023. There were 1,562 attendances at these training sessions compared to 2,036 in the previous year. Furthermore, 396 editions of course were held, which is 31% less than the 650 editions held in 2023.
- In terms of corrective and improvement actions, 330 actions were properly managed, an increase of 58% compared to the 209 actions in 2023. 188 occupational risk assessments were carried out, an increase of 21% compared to 156 assessments in the previous year. These assessments included 106 workplace assessments, 19 workstation assessments, 27 assessments for occupational safety, 35 for industrial hygiene and 1 ergonomics assessment.
- 432 suppliers of works and services were approved in terms of health and safety to carry out work at Almirall centers, an 12% increase compared to 386 suppliers in 2023.
- There were also 83 monitoring and control activities performed, a reduction of 31% compared to 120 activities in 2023. These activities included 40 self-inspections, 21 other inspections, 12 visits by Management, 2 supplier audits, 1 observation and 7 internal and external audits.
- 66 incidents and 75 non-conformities were reported, investigated and properly assessed, representing 20% fewer incidents and 142% more non-conformities compared to 2023. Finally, 1,225 medical check-ups of employees were performed (an 8% increase compared to the 1,136 check-ups in 2023).

### Accidents at work (Own workforce)

The tables in this section summarize the main statistical data on accidents at the different Almirall centers for the 2022, 2023 and 2024 financial years. As can be seen, compared to the 2023 data, in 2024 there has been a 40% reduction in the number of accidents with disability leave at work (9 in 2024 vs 15 in 2023):

- Incidence rate: in 2024 it decreased by 43% globally (4.4 vs. 7.7). In 2024 there were no accidents at the Headquarters, nor in the Sant Feliu R&D site, or any of the commercial subsidiaries, except in Spain, where there was one minor accident. Accident rates have decreased at all industrial sites.
- Frequency rate: in 2024, this decreased by 45% (2.2 vs 4.0), applying the same considerations here as for the incidence rate.
- Severity index: in 2024, the severity index decreased by 13% (0.07 vs 0.08).

It is important to note that, taking as a reference the official accident rate data for the last period published by the Ministry of Labor, Migration and Social Economy, the incidence rate of accidents with disability leave in 2024 was 76% below the level of the Industry Sector, Pharmaceutical Products Manufacturing Division (4.4 vs 18.2). Likewise, the severity rate of accidents resulting in disability leave in 2024 was 92% below the level of the Industry Sector, Manufacturing Industry Division (0.07 vs 0.91).

The tables in this section summarize the main statistical data on accidents at the different Almirall centers for the 2022, 2023 and 2024 financial years. Accident data disaggregated by gender of the workers employed in the company are also shown, with an indication of the incidence, frequency and severity rates.

Center	General data		Disability leave				
	Average workforce (1)	Hours worked (2)	Accid.	Days lost	I <sub>i</sub> (3)	I <sub>F</sub> (4)	I <sub>e</sub> (5)
Headquarters	329	639,168	0	0	0	0	0
Sant Feliu R&D Center	195	372,600	0	0	0	0	0
Sant Andreu Pharmaceutical Plant	451	877,248	9	91	19.9	10.3	0.10
Reinbek Pharmaceutical Plant	121	262,387	2	68	16.5	7.6	0.26
Chemical plants	72	140,488	1	3	13.8	7.1	0.02
Commercial subsidiaries	701	1,298,715	1	46	1.4	0.8	0.04
<b>2022 Total</b>	<b>1,869</b>	<b>3,590,606</b>	<b>13</b>	<b>208</b>	<b>7.0</b>	<b>3.6</b>	<b>0.06</b>
Women	1,010	1,938,927	9	29	8.9	4.6	0.01
Men	859	1,651,679	4	179	4.7	2.4	0.11

Table 53 Accident rate of Almirall Group workers in 2022

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Center	General data		Disability leave				
	Average workforce (1)	Hours worked (2)	Accid.	Days lost	I <sub>I</sub> (3)	I <sub>F</sub> (4)	I <sub>G</sub> (5)
Headquarters	344	677,216	0	0	0	0	0
Sant Feliu R&D Center	208	409,008	1	8	4.8	2.4	0.02
Sant Andreu Pharmaceutical Plant	465	926,816	8	257	17.2	8.6	0.28
Reinbek Pharmaceutical Plant	127	274,623	3	27	23.6	10.9	0.10
Chemical plants	73	143,416	1	48	13.7	7.0	0.33
Commercial subsidiaries	730	1,359,729	2	34	2.7	1.5	0.03
<b>2023 Total</b>	<b>1,947</b>	<b>3,790,808</b>	<b>15</b>	<b>374</b>	<b>7.7</b>	<b>4.0</b>	<b>0.10</b>
Women	1,051	2,047,036	8	251	7.6	3.9	0.12
Men	896	1,743,772	7	123	7.8	4.0	0.07

Table 54 Accident rate of Almirall Group workers in 2023

Center	General data		Disability leave				
	Average workforce (1)	Hours worked (2)	Accid.	Days lost	I <sub>I</sub> (3)	I <sub>F</sub> (4)	I <sub>G</sub> (5)
Headquarters	377	744,736	0	0	0	0	0
Sant Feliu R&D Center	223	427,608	0	0	0	0	0
Sant Andreu Pharmaceutical Plant	479	946,000	5	242	10.4	5.3	0.26
Reinbek Pharmaceutical Plant	156	297,362	2	18	12.8	6.7	0.06
Chemical plants	76	149,088	1	22	13.2	6.7	0.15
Commercial subsidiaries	744	1,494,936	1	6	1.34	0.67	0.004
<b>2024 Total</b>	<b>2,055</b>	<b>4,059,730</b>	<b>9</b>	<b>288</b>	<b>4.4</b>	<b>2.2</b>	<b>0.07</b>
Women	1,110	2,192,254	3	126	2.7	1.4	0.06
Men	945	1,867,476	6	76	6.4	3.2	0.04

Table 55 Accident rate of Almirall Group workers in 2024

- 1) Average number of workers in the period.
- 2) Number of planned hours worked + number of overtime hours – number of absence hours
- 3) Incidence rate: number of accidents per thousand workers.
- 4) Frequency rate: number of accidents per million hours worked.
- 5) Severity rate: number of days lost per thousand hours worked.

All reported accidents are minor. There have been no serious, very serious or fatal incidents.

Through the occupational health and safety management system and the identification, evaluation and control mechanisms, no workers with a high incidence or high risk of occupational diseases have been identified. No occupational diseases were identified and reported in 2024.

### Accidents at work (Non-employees)

The tables in this section summarize the main accident statistics for non-employees at work centers located in Spain<sup>7</sup>:

Center	General data		Disability leave				
	No. of employees	Hours worked (6)	Accid.	Days lost	I <sub>I</sub> (7)	I <sub>F</sub> (8)	I <sub>G</sub> (9)
Workers of construction and service contractors (1)	3,732	6,538,464	2	42	0.5	0.3	0.01
Temporary agency workers (2)	65	113,880	0	0	0	0	0
Scholarship holders (3)	80	134,400	0	0	0	0	0
<b>2024 Total</b>	<b>3,877</b>	<b>6,786,744</b>	<b>2</b>	<b>42</b>	<b>0.5</b>	<b>0.3</b>	<b>0.01</b>
Women (4)	2,094	3,664,842	1	34	0.5	0.3	0.01
Men (5)	1,783	3,121,902	1	8	0.6	0.3	0

Table 56 Accident rate for the year for non-employees of the Almirall Group

- 1) Average number of workers in the period, accredited by approved contractors to be able to perform work at Almirall's centers.
- 2) Number of workers accumulated during the year.
- 3) Number of workers accumulated during the year.
- 4) It is considered to be 54% women, the same as with Almirall's workforce.
- 5) It is considered to be 46% male, the same as with Almirall's workforce.
- 6) Number of theoretical hours worked.
- 7) Incidence rate: number of accidents per thousand workers.

<sup>7</sup> With regards to the information on accidents at work of non-employees, 2023 is the first year that it is reported, and only for Almirall's centers and activities in Spain, which represent approximately 65% with respect to the company as a whole, in terms of the number of workers employed.

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- 8) Frequency rate: number of accidents per million hours worked.
- 9) Severity rate: number of days lost per thousand hours worked.

All reported accidents are of a minor nature, i.e. none are serious, very serious or fatal.

Through the occupational health and safety management system and the identification, evaluation and control mechanisms, no non-employee with a high incidence or high risk of occupational diseases has been identified. No occupational diseases were identified and reported in 2024.

### **Consultation and participation of workers**

In general, at Almirall's work centers in Spain with 50 or more employees, a Health and Safety Committee has been established as a joint and collegiate participation body for regular and periodic consultation of the company in matters of occupational risk prevention. The Health and Safety Committee is formed by the Prevention Delegates, on the one hand, and by representatives of the company in a number equal to that of the Prevention Delegates.

On the other hand, at the Almirall Germany center (Reinbek) the so-called ASA Committee (Occupational Safety and Health Committee - *Arbeitsschutzausschuss*) has been established, in which both the company and the workers (Work Council - Prevention Delegates) are represented, in addition to the support of the Medical Service and various technical figures in Prevention.

At a general level, the participation and consultation of workers takes place formally, through their representatives (Prevention Delegates), in the periodic meetings of the different Health and Safety Committees/ASA Committees. Nonetheless, on a day-to-day basis, the Prevention Delegates are informed and included as participants in the different processes managed in the PREVAL corporate application (incident investigations, change controls, audits, self-inspections, corrective and preventive actions, etc.), as well as on an occasional basis by means of specific information and consultation memos.

The following table lists the 8 Safety and Health Committees / ASA Committees that have been operating in Almirall's centers in 2024, as well as the 33 meetings held during the year.

Center	2022	2023	2024
Headquarters	9	5	5
Sant Feliu R&D Center	7	4	5
Sant Andreu Pharmaceutical Plant	4	4	4
Reinbek Pharmaceutical Plant	4	4	5
Sant Andreu Chemical Plant	4	4	4
Sant Celoni Chemical Plant	4	4	4
Almirall, S.A. Spanish Subsidiary	8	6	3
Laboratorios Almirall, S.L. Spanish Subsidiary	8	6	3
Industrial Area Laboratorios Almirall S.L.	4	0	0
<b>Total</b>	<b>52</b>	<b>37</b>	<b>33</b>

Table 57 Meetings held by Health and Safety Committees/ASA Committees

As a general assessment of what was discussed in the formal meetings of the different Health and Safety Committees/ASA Committees held during 2024, it can be concluded that no special issues arose that required comments beyond what is described in the minutes of these meetings and in any corrective and improvement actions that may have been managed through PREVAL.

### **Actions carried out for the promotion of health and well-being**

As part of its commitment to health and well-being, Almirall has implemented various initiatives to promote the health of its employees and create healthy working environments. A notable milestone for the company in 2024 was the creation and launch of the Health, Safety and Wellbeing Roadmap 2030, approved by the Sustainability Committee in the last quarter of 2024. This Roadmap is part of the Sustainability and Social Impact Strategic Plan, specifically within the 'People' pillar, and consists of four main pillars: culture of safety and operational excellence, well-being, strategic alliances, and communication and awareness. The Roadmap sets out in detail an ambitious five-year strategic plan to further improve the well-being of Almirall's workers.

The Roadmap will give continuity to the "YouFeelWell" Corporate Wellness Program with the aim of strengthening the health and well-being of its employees and their environment. This program encourages the awareness and learning of healthy habits, providing access to tools and resources so that workers can unleash



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their full potential and boost their inner energy. Well-being is understood as a multidimensional concept that is achieved by balancing different elements. The program is therefore built around four main pillars: physical, mental, social and financial/professional development.

In 2024, participation in the workshops and talks has been very high and highly valued by the workers, who are grateful for Almirall's efforts and investment in promoting their health.

Of particular note is the *YouFeelWell Challenge* which, in its 2024 edition, became more inclusive, holistic, interactive and supportive. This 12-week global challenge, supported by a social webapp, allows working people to choose to walk, run, cycle or swim, accumulating "Almirómetros" (Almirometers) that are converted into money to donate to selected patient associations. In 2024, the beneficiary organizations were the Atopic Dermatitis Association (AADA), the European Federation of Allergy and Airways Diseases Patients' Associations (EFA) and the European Psoriasis Association (EUROPSO).

The YouFeelWell program won the best initiative to promote health in the workplace at the 11th edition of the Atlante de Foment de Treball awards, highlighting its holistic and integral vision of well-being. This recognition reflects Almirall's commitment to the care of its employees and the success of the program thanks to everyone's participation.

### 5.2.15. Work-life balance

The Group's workforce has various options for work-life balance in the different geographical areas where it operates. This section provides details of the most relevant ones

#### *Working Time Records and Digital Disconnection*

The Working Time Record is maintained using a computerized tool that allows workers to consult the number of hours they have worked, which is mandatory in workplaces in Spain, in accordance with the provisions of Royal Decree Law 8/2019 of 8 March.

As a result, Almirall employees in Spain are better able to see the time invested in carrying out their activities, which allows them to improve the efficiency of their working time and enjoy greater autonomy.

Outside of Spain, working time records are kept in accordance with the labor requirements of each country.

#### *Policies for work-life balance and support for the family*

Almirall aims to facilitate the needs of all its employees outside of the workplace, respecting, facilitating and encouraging their relations with the family environment.

Through the articulation of internal policies we encourage all workers to balance their work and personal lives. This includes flexible working hours, teleworking, and paid family leave. In this regard, the Company makes the provision, both nationally and internationally, for employees to take paid family-leave and/or leave of absence, in order to be able to satisfactorily balance their personal and professional life, and always in accordance with the regulations of each country.

Thus the following leaves and leaves of absence are included in the national labor regulations, as well as in the national collective bargaining agreement applicable in the country and in the internal regulations, published through various guides on our corporate intranet:

- Leave for the birth of a child
- Parental leave
- Leave of absence to care for child(ren)/family

The following tables show the percentage of eligible employees (i.e., who meet the legal requirements for the leave) who took family-related leave.

Maternity / paternity leave	2024
<b>Number of workers entitled to maternity/paternity leave</b>	<b>84</b>
Women	50
Men	34
total % of workers entitled to maternity / paternity leave	100%
Women	60%
Men	40%
Number of workers who exercised the right during the year	84

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Maternity / paternity leave	2024
Women	50
Men	34
% of workers who exercised the right during the year	100%
Women	100%
Men	100%

Parental leave	2024
<b>Number of workers entitled to request parental leave</b>	<b>1,063</b>
Women	594
Men	469
total % of employees entitled to request parental leave	100%
Women	56%
Men	44%
<b>Number of workers who exercised the right during the year</b>	<b>29</b>
Women	23
Men	6
% of workers who exercised the right during the year	2.7%
Women	3.9%
Men	1.3%

Leave of absence	2024
<b>Number of workers entitled to request leave of absence</b>	<b>1,354</b>
Women	762
Men	592
total % of workers entitled to request leave of absence	100%
Women	56%
Men	44%
<b>Number of workers who exercised the right during the year</b>	<b>18</b>
Women	16
Men	2
% of workers who exercised the right during the year	1.3%
Women	2.1%
Men	0.3%

### Work organization

Almirall has working calendars that are applicable to all employees and compatible with the legislation in force in each country. The calendars are shared with the Legal Representation of workers to try to align, as far as possible, the productive needs of the company with personal life. For easy consultation by all employees, the company makes the aforementioned calendars available for each year and posts them on the corporate Intranet in the month of December.

In addition to the legally stipulated annual leave, depending on the country, Almirall offers up to seven additional days off to be taken over the course of the calendar year. For a better adaptability to the needs of the employee, these additional rest days can be taken in fractions of half days.

The company is committed to the well-being of its employees and, for this reason, with the aim of ensuring work-life balance, the work calendar includes a flexible work schedule, for both entering and leaving, which allows weekly working hours to be adapted to reconcile work and personal life.

Likewise, the company, in line with current labor regulations, has updated its intranet with all the paid and unpaid leave cases contemplated in the general labor regulations, as well as those set out in the State Chemical Industry collective bargaining agreement, establishing the different types of leave that workers can request and enjoy, which are also reflected in the working day register, and the information can be accessed at any time.

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During 2022, a flexibility model entitled Turn it Flex was implemented. This model allows the working day to be adapted to the personal needs of each employee. Flexible working hours have been extended in all subsidiaries in accordance with local market practices, the holidays calendar has been made more flexible, extending the discretionary days off for personnel who work a split workday, and the teleworking model has been implemented, with up to 2 days a week in this modality, provided that the job position allows it. This point is included in the teleworking policy, published on the intranet, which also includes our employees' right to digital disconnection.

In the same way, employees who work shifts in the industrial area can change them on a rotating basis, with the possibility of morning, afternoon and night shifts. As for the industrial plants, there are rotating morning, afternoon and evening schedules, and annual leave and public holidays are pre-established in the calendar in order to ensure the pace of production.

In order to promote and encourage a more collaborative and innovative environment that allows for greater agility, efficiency and flexibility, a new model of office space has been defined. Implementation of the Flexible Work Place project has been completed in the buildings of the Sant Andreu de la Barca Pharmaceutical Plant Headquarters and Central Headquarters, and is currently being implemented in the R&D center in Sant Feliu de Llobregat. New offices have also been opened in Sweden and Norway, as well as refurbishments in line with the same philosophy at our German headquarters.

### 5.2.16. Pay Equity Criteria and Pay Gap at Almirall

The Company's remuneration policy is described in detail in section Adequate wages of this report, followed by a breakdown of the impact of this on equal pay among the people who make up the organization.

At year-end 2024, Almirall's unadjusted pay gap (without taking into account job characteristics) averaged -10%, i.e., on average, women were paid 10% less than men in Total Remuneration (Fixed Remuneration + Short-Term Variable Remuneration) or, to put it another way, women earn 90% of a man's Total Compensation. The calculation method differs from that used in 2023 in order to adapt to the requirements of the CSRD, but historical figures have not been recalculated as they are not material for comparative purposes.

The calculation formula used was as follows, considering the theoretical hours per country according to the agreements/regulations existing in each of them:

$$\text{Average Pay Gap} = \left( \frac{\text{Average Total Hourly Remuneration Men} - \text{Average Total Hourly Remuneration Women}}{\text{Average Total hourly remuneration Men}} \right) \times 100$$

In terms of wages, the most representative statistical parameter is the median, and so the gap between the median wages of women and men has also been calculated. The formula used was:

$$\text{Average Pay Gap} = \left( \frac{\text{Average Total Hourly Remuneration Men} - \text{Average Total Hourly Remuneration Women}}{\text{Average Total hourly remuneration Men}} \right) \times 100$$

In this case, overall, the gap is reduced from 10% (average) to a gap of -1% (median).

Geography	Global data 2023	Data 2024						
		Global			Administrative Manual workers	Professionals	Middle Management	Directors
		Women	Men	Gap	Gap	Gap	Gap	Gap
Spain	13.5%	73,025	80,980	9.8%	-2.0%	7.7%	6.5%	21.8%
Germany	6.4%	88,656	90,426	2.0%	-11.9%	2.3%	4.8%	18.1%
United States	26.7%	151,161	241,245	37.3%	0.0%	13.7%	24.4%	19.3%
Italy	22.5%	69,777	82,687	15.6%	30.5%	10.5%	4.5%	33.9%
United Kingdom	24%	111,679	140,501	20.5%	0.0%	5.5%	-3.0%	0.0%
Switzerland	20.5%	125,655	199,106	36.9%	0.0%	19.2%	12.1%	0.0%
Austria	24.7%	113,702	138,668	18.0%	0.0%	1.6%	-5.2%	20.6%
Belgium	5.5%	142,174	153,180	7.2%	0.0%	-3.1%	-63.6%	0.0%
Netherlands	10%	102,229	90,390	-13.1%	0.0%	4.5%	0.0%	0.0%
France	3.8%	95,730	108,565	11.8%	0.0%	4.9%	10.5%	0.0%
Portugal	40.5%	57,464	103,838	44.7%	0.0%	33.0%	34.6%	0.0%
Denmark	41.3%	122,954	207,884	40.9%	0.0%	-9.8%	0.0%	0.0%
Sweden	16.5%	107,822	125,916	14.4%	0.0%	-9.8%	0.0%	0.0%
Norway	0.0%	98,217	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Poland	-35%	72,620	55,559	-30.7%	0.0%	-14.9%	0.0%	0.0%

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Geography	Global data 2023	Data 2024						
		Global			Administrative Manual workers	Professionals	Middle Management	Directors
		Women	Men	Gap	Gap	Gap	Gap	Gap
China	0.0%	147,075	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Slovak Republic	0.0%	53,680	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Czech Republic	40.8%	56,146	83,760	33.0%	0.0%	-2.1%	0.0%	0.0%
<b>Total</b>	<b>11.8%</b>	<b>82,488</b>	<b>91,565</b>	<b>9.8%</b>	<b>-8.6%</b>	<b>3.1%</b>	<b>8.3%</b>	<b>24.3%</b>

Table 58 Pay gap by category, gender and country

Below is the pay gap taking into account total compensation (base salary 100% and target short-term incentives 100%) by gender, country and grade (according to our Global Job Map). The grades between 2 and 17 are not shown because there is no gender gap (due to non-comparability between genders).

Country	Global			Breakdown of the gap by grade											
	Women	Men	Gap	3	4	5	6	7	8	9	10	11	12	13	16
Spain	73,025	80,980	9.8%	9.4%	-2.2%	-0.6%	12.1%	6.8%	5.9%	5.7%	5.9%	3.5%	6.4%	3.4%	-2.6%
Germany	88,656	90,426	2.0%	-7.4%	-13.6%	-8.0%	4.0%	3.0%	-2.5%	9.5%	-6.1%	5.6%	0.0%	0.0%	0.0%
United States	151,161	241,245	37.3%	0.0%	0.0%	0.0%	2.8%	2.7%	-8.3%	17.8%	0.0%	8.6%	0.0%	0.0%	0.0%
Italy	69,777	82,687	15.6%	0.0%	0.0%	30.9%	38.3%	7.9%	-2.0%	4.0%	0.0%	11.7%	0.0%	0.0%	0.0%
United Kingdom	111,679	140,501	20.5%	0.0%	0.0%	0.0%	0.0%	-14.7%	-1.0%	0.0%	2.0%	0.0%	0.0%	0.0%	0.0%
Switzerland	125,655	199,106	36.9%	0.0%	0.0%	0.0%	0.0%	22.3%	-6.8%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Austria	113,702	138,668	18.0%	0.0%	0.0%	0.0%	0.0%	-7.9%	15.9%	0.0%	0.0%	0.0%	20.6%	0.0%	0.0%
Belgium	142,174	153,180	7.2%	0.0%	0.0%	0.0%	0.0%	5.6%	-11.8%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Netherlands	102,229	90,390	-13.1%	0.0%	0.0%	0.0%	0.0%	0.0%	15.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
France	95,730	108,565	11.8%	0.0%	0.0%	0.0%	0.0%	1.3%	0.3%	5.3%	12.0%	0.0%	0.0%	0.0%	0.0%
Portugal	57,464	103,838	44.7%	0.0%	0.0%	0.0%	0.0%	0.0%	9.8%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Denmark	122,954	207,884	40.9%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Sweden	107,822	125,916	14.4%	0.0%	0.0%	0.0%	0.0%	0.0%	-14.9%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Norway	98,217	-	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Poland	72,620	55,559	-30.7%	0.0%	0.0%	0.0%	0.0%	3.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
China	147,075	-	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Slovak Republic	53,680	-	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Czech Republic	56,146	83,760	33.0%	0.0%	0.0%	0.0%	0.0%	0.0%	-11.7%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>82,488</b>	<b>91,565</b>	<b>9.8%</b>	<b>-7.5%</b>	<b>-11.2%</b>	<b>-3.7%</b>	<b>10.4%</b>	<b>-2.3%</b>	<b>-2.2%</b>	<b>17.5%</b>	<b>3.7%</b>	<b>15.8%</b>	<b>10.8%</b>	<b>8.9%</b>	<b>-2.6%</b>

Table 59 Pay gap by grade, gender and country

On the other hand, the adjusted pay gap between men and women has been estimated.

For this process, it is necessary to use econometric models to compare total remuneration between men and women, taking into account the correlations generated in other dimensions by the differences in the different characteristics of the worker and the job.

The objective of a regression model is to try to explain the relationship between the different independent explanatory variables and the dependent or response variable.

The regression model used has the following expression:

$$\ln(y_i) = \beta_0 + \beta_1 * Female_i + \sum_{j=2}^m \beta_j * x_{ij} + \varepsilon_i$$

Where  $\ln(Y_i)$  is the neperian logarithm of  $Y_i$  which is the worker's total remuneration.

Woman<sub>i</sub> is a dummy variable that takes the value 1 if the worker is a woman and 0 if the worker is a man. And the remainder of  $X_{ij}$  are a series of control variables that potentially determine the total compensation of a worker. The coefficient of interest is the  $\beta_1$  coefficient which indicates the percentage difference between a female and a male. The control variables considered are as follows:

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- 1) Location of the position, country of residence.
- 2) The extent, role contribution, of the employee's position in the company on the company's Global Job Map.

The following variables were initially considered, but finally discarded because they provided little explanation:

- 1) Duration of service in the company of the employee.
- 2) Age of the employee

By performing linear regression of the model, a coefficient of determination of R2 of 72% was obtained. This means that 72% of a worker's total compensation at Almirall is explained by the independent variables specified above. The p-values of the control variables considered were less than 0.05, and therefore statistically significant.

The regression model obtained for 2024 has the expression:

$$\text{Ln}(\text{Total Remuneration}) = 9,813 - 0,027 * \text{Gender} + 0.0154 * \text{Location}(\text{country}) + 0.195 * \text{Grade} (\text{global map})$$

The parameter  $\beta_1 = -0.027$

Since the dependent variable in the above equation is in logarithms, the coefficient  $\beta_1$  is interpreted as follows: the differential in salaries between a woman and a man is  $100 * \beta_1\%$ . Thus, in Almirall for 2024 we have an adjusted gap of: -2.7%. In other words, of the total unadjusted gap presented of -10% there is a portion that can be explained by the location of the position and its contribution in the company, thus reducing the gender-related portion -2.7%. Performing the same statistical analysis with the information for the past 2023, we see that the adjusted gap for this period was -2.5%.

The ratio of the total remuneration of the Group's highest paid employee<sup>8</sup> to the median of the rest of the Group's employees<sup>9</sup> is 21.

### 5.2.17. Human Rights Incidents and Complaints

Human rights violations are classified as all those that threaten human dignity, regardless of nationality, sex, national or ethnic origin, color, religion, language or any other status. They range from the most fundamental - the right to life - to those that make life worth living, such as the right to food, education, work, health and freedom.

Of the 19 cases investigated in 2024 (see section 2.2.4 "Prevention and detection of corruption or bribery"), none of these cases involved complaints of human rights violations.

## 5.3. Workers in the value chain

Almirall demonstrates a firm commitment to human rights that extends beyond its workforce to include the workers in its value chain. In this regard, suppliers must comply with this principle by respecting the human rights of their own workers and treating them with integrity, dignity and respect. The company implements policies based on international principles, such as the UN Global Compact, the Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises and key International Labor Organization standards, as well as industry initiatives such as the Pharmaceutical Supply Chain Initiative, of which it has been an associate member since September 2022. At the same time, it ensures that these policies are reflected in its value chain, in the Almirall Supplier Code of Conduct with specific provisions and in the Global Procurement Policy.

Suppliers are expected to comply with international human rights treaties as a minimum, without prejudice to more favorable national laws. In particular, suppliers' compliance with ILO (International Labor Organization) conventions and the principles set out in the Universal Declaration of Human Rights is an essential requirement.

Youth and child labor is prohibited by ILO Convention 138 on Minimum Age. In accordance with the above-mentioned Supplier Code of Conduct, Almirall's suppliers may not use child labor. The minimum working age set out in ILO Convention 138 is 15 years (or 14 years according to the exceptions for developing countries' under the Convention). If the supplier's national law stipulates a higher working age or compulsory schooling, the higher age must apply. Furthermore, work carried out by workers under the age of 18 must always respect the minimum conditions of employment in force according to the regulations of each country, and in no case

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<sup>8</sup> For the remuneration of the best paid employee we have taken into consideration the base salary received during the year, short-term incentives (STI) and long-term incentives (LTI) paid in March of the year and all salary supplements (seniority, school allowances, rental allowances, car allowances and other extraordinary bonuses). In addition, for forming part of the Management Board as Chairman, we have also taken into account the fees and payments associated with this position.

<sup>9</sup> For the remuneration of the employees, the basic salary and the variable salary (STI-bonus or incentives) as at year-end 2024 have been taken into account.

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may it be contrary to the minimum conditions established by the ILO. In this regard, children under the age of 18 are prohibited from performing hazardous work (dangerous, unhealthy or harmful to their morals).

Furthermore, Almirall's suppliers must respect the minimum hiring and employment conditions established by the regulations in force and they are prohibited from using forced, bonded or indentured labor, as well as prison labor.

In addition, Almirall has launched a project called "High-risk Materials" to identify the possible impacts on Human Rights of a set of materials agreed by the PSCI due to their importance for the pharmaceutical industry. Almirall's assessment analyzed human rights and labor conditions throughout the supply chain, from the extraction to processing of key materials such as palm oil and aluminum. High-risk areas were identified in regions of Asia, Latin America and Europe (including Ukraine), where significant challenges to labor rights exist. For more details on the "High-risk Materials" project, see section 2.3.1 "Supply chain management approach".

### 5.3.1. Impact, Risk and Opportunity Management

In terms of risk management, Almirall integrates the risks related to workers in its value chain in a corporate process led by the Executive Director Internal Audit, with each business area being responsible for identifying and managing risks in their respective areas.

The company is also committed to identifying, assessing and monitoring these risks and opportunities by means of an integrated and multidisciplinary process. For more details on the method used in the analysis of Double Materiality and the identification of Impacts, Risks and Opportunities, see section 3.2 of this report.

This includes an analysis that has provided insight into how workers in its value chain with particular characteristics or working in specific contexts may be at a greater risk of harm. In the 2024 Double Materiality analysis, the specialized teams of the different areas identified relevant risks and opportunities for workers in Almirall's value chain, with no significant impacts having been detected.

#### Risks

- **Labor conditions:** The declining performance of workers in the value chain and loss of motivation due to unsafe working conditions and excessive working hours could negatively affect operational efficiency and product quality.
- **Adequate wage:** An inadequate wage policy along the value chain can reduce productivity and increase staff turnover, leading to labor unrest, grievances and possible sanctions. These factors compromise operational efficiency and employee motivation, and can even lead to strikes or boycotts that impact delivery times and product quality.
- **Work-life balance:** A lower engagement and productivity at work due to a reduced work-life balance for workers in Almirall's value chain could negatively affect operational efficiency and the quality of the products offered by the company.
- **Health and safety:** Unsafe working conditions for workers in the value chain can negatively affect the company's reputation and efficiency. This can lead to accidents, absenteeism and low productivity, impacting product quality and delivery times.

#### Opportunities

- **Freedom of expression:** Increasing labor productivity by promoting the satisfaction and well-being of employees in Almirall's value chain, through the creation of spaces for the expression of concerns in the workplace. This can be achieved by promoting the SpeakUp! channel so that workers in the value chain can voice their concerns, as well as by conducting on-site audits of suppliers in the coming years, as part of the development of the audit program mentioned in section 2.2.4 of this report.

### 5.3.2. Policies and commitments related to value chain workers

Almirall's relationships are based upon respect for the law, for all assumed commitments, for quality of service and for integrity in contracts. Quality, thoroughness, commitment and excellence are demanded from all those involved in the value chain, both upstream and downstream. In addition to the Human Rights Policy, Almirall has other policies such as the Code of Ethics, the Supplier Code of Conduct and the Purchasing Policy, detailed in section 2.3.1 "Supply chain management approach", to ensure that suppliers are aligned with Almirall's commitments in relation to working conditions, adequate pay, work-life balance and health and safety in the workplace.

## **Human Rights Policy**

As mentioned in the previous chapter, in 2022 Almirall approved its Global Corporate Human Rights Policy, signed by the Board of Directors, reaffirming its commitment to international standards, including respect for diversity based on race, gender, sexual orientation and other personal characteristics. This policy is based on the principles of the UN Global Compact and ILO standards, and is aligned with the company's Code of Ethics.

The policy states, among other things, that the production processes of workers in the value chain must take place in fair working environments, prohibiting child labor, forced labor and any form of exploitation. Almirall conducts ongoing due diligence to ensure respect for and protection of the human rights throughout its value chain that are linked to identified risks and opportunities, such as labor conditions, health and safety and social dialogue.

### **5.3.3. Procedures, actions and resources in relation to workers in the value chain**

Almirall's Code of Conduct states that the workers of suppliers have access to Almirall's SpeakUp! whistleblowing channel (available on the website: <https://almirall.integrityline.com>) in order to report concerns or illegal activities in the workplace and should be able to do so without being threatened with retaliation, intimidation or harassment.

Furthermore, if mandatory under its national legislation, Almirall requires its suppliers to provide whistleblowing channels for its own workers. Almirall also expects suppliers to investigate the reported situations and take corrective action if necessary. As part of this commitment, Almirall will implement a communication plan with its suppliers in 2025 to promote social dialogue throughout the value chain. This program, identified as a new area of development, will include the promotion of the SpeakUp! channel to ensure that workers have a safe space where they can voice their concerns. All these developments will be reported to the Sustainability Committee.

In 2024, Almirall has not received any complaints of human rights violations in relation to the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, or the OECD Guidelines for Multinational Enterprises affecting workers in its value chain. However, a comprehensive Human Rights risk assessment of the entire value chain, both upstream and downstream, in accordance with the due diligence principles of the Corporate Sustainability Due Diligence Directive (CSDDD) has yet to be conducted. A comprehensive plan is currently being designed to identify these risks, including a full review of our operations, suppliers and partners. The assessment is expected to be completed in 2026.

Furthermore, as set out in section 2.3.3 "Levers and tools for sustainable supply chain management" of this report, in order to reduce the social and human rights impact of our supply chain, Almirall remotely assesses its key suppliers through an independent global rating agency. Based on the results of the assessment and the identified risks, individual action plans are implemented for each supplier.

Finally, section 2.3.5 "Sustainable Supply Chain goals and targets" explains the interactions with the supply chain in more detail.

### **5.3.4. Goals and targets in relation to workers in the value chain**

A summary table of progress in the related targets of the Sustainable Procurement Program can be found in section 2.3.5 "Sustainable Supply Chain goals and targets".

To reinforce our commitment to human rights, the protocol and SOP of our online ESG audit process will be reviewed and updated in 2025, with the aim of increasing the minimum valid score of the Labor & Human Rights pillar. It will be proposed to increase the threshold for the Human Rights pillar in the Ecovadis audit to 40 or 45 points in order to be deemed valid and approved. If a supplier does not meet this threshold, it will be assigned corrective actions in this specific area in order to implement them and raise its score to the defined thresholds.

## **5.4. End consumers: Patients**

At Almirall, the mission is focused on improving the lives of people living with skin diseases. There is a commitment to offering effective treatments that not only help to improve their health, but also their quality of life. Understanding patients and their needs is central to the Group's approach, which ranges from scientific innovation and the development of new treatments to the marketing of the same. All of this with the aim of providing truly impactful and effective solutions. Almirall also promotes initiatives to raise awareness of skin diseases and reduce the stigma that often surrounds them, thus working towards a more informed and empathetic society.

In the pharmaceutical sector, the relationship between companies and their end users (i.e., patients) depends on multiple factors, such as the healthcare system in each geographical area, the pathology and severity of the disease, the distribution channel, the type of medicinal product and the stage of development of the medicine,

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among other aspects. Described below are the most common cases where there is interaction between the company and the patient. These include the clinical trial patient, the hospital, outpatient and home patient, and in rare cases, a home patient who is a minor and a pediatric patient for certain medicines such as syrups.

First, access to a medicine in a territory depends on prior regulatory authorization, such as that of the EMA for the EU or the FDA for the US. Without this approval, access is practically non-existent, as the associated costs of treatment (medication, hospitalization, tests, visits, etc.) are so high that they are within the reach of very few cases and would not be economically viable for a company either.

Once approval is obtained, access to the medicines from an economic point of view varies greatly depending on the geography. In summary, two models can be distinguished in the territories in which the Group operates:

- Existence of a national health system that covers most patients: this is the dominant case in the European Union, where medicines agencies grant a reimbursement price for products, which are usually innovative medicines or medicines linked to chronic diseases. In such cases, most of the cost is borne by the national system, with the patient contributing a small part (sometimes nothing at all).
- Coverage through a private insurance system: this is the dominant case in the United States, for example. In this case, the patient must have private coverage (health insurance is usually included in the remuneration package of the workers) and it is the company that agrees the conditions and coverage of each of its products with the different insurers. In this case, each patient is dependent on individual coverage when it comes to paying the price of a medicine.

These two systems are not mutually exclusive and may coexist in the same geographical area. There may also be different levels of co-payment, both between the patient and payer, and between the pharmaceutical company and payer (be that the national health system or an insurance company). Finally, there are medicines that are freely priced and the company determines the price directly in the market.

Depending on the pathology and severity of the disease, access to the medicine may be restricted. Some treatments require a prescription from a health professional (the family doctor or specialist) while others are over-the-counter (i.e., do not require a prescription). In the first case, the company interacts with these professionals (commonly referred to as prescribers) through medical sales representatives. In the second case, the interaction takes place through promotion in pharmacies or in direct-to-patient advertising campaigns (always respecting the regulations of each territory).

Furthermore, various events (congresses, symposia, seminars, etc., some of which are sponsored or organized by the company itself) are organized throughout the year, at which educational medical programs are held to keep healthcare professionals up to date with the latest advances and research, led by the medical department in most cases.

Finally, in the case of medicines under development, patients who participate in clinical studies are carefully selected by the investigators responsible for the study at the relevant site and following protocols previously approved by the relevant regulatory authorities.

There are two key approaches from a product quality and patient safety point of view:

- **Quality control:** the pharmaceutical industry has very high-quality standards, both because of regulatory requirements and because of the risk of supplying the market with products that do not meet the specifications and could harm patients. The Group's quality teams are responsible for the internal control of any product involved in the production process (whether marketed products or products under development). This includes conducting audits at any production site that is part of the value chain, as well as managing audits received from third parties and regulatory bodies.
- **Pharmacovigilance:** pharmaceutical companies have a department dedicated to collecting information from consumers about any suspected adverse reaction to a medicine, whether the effects are described in the package leaflets and data sheets or are not expected, including lack of efficacy, or any other condition of use different to that authorized. This feedback can come from any source (healthcare professionals, patients, staff, etc.) and this department is responsible for collecting the information, investigating whether previously unknown risks or changes in the severity or frequency of known risks occur, assessing the relationship between these risks and the benefit of the product, and taking the appropriate action.

Finally, there is also interaction between the Group and patient advocacy groups (associations, NGOs and similar), who advocate for their communities, influencing their governments and the national and regional health authorities on various topics) with which it collaborates to understand patients' needs and concerns, to support disease awareness campaigns or to educate the public about diseases and treatment options.



#### 5.4.1. Impact, Risk and Opportunity Management

Almirall is committed to improving the health, quality of life and social inclusion of patients through the development of safe medicines and products, guaranteeing the quality of the same. The company has a pharmacovigilance system that allows adverse reactions to be reported through various channels, ensuring a constant monitoring of the safety of its products. Almirall also works closely with healthcare professionals and patient organizations to improve care for chronic and autoimmune diseases, providing support and information that builds confidence and optimizes clinical outcomes.

Almirall manages the risks, opportunities and impacts affecting patients through a comprehensive corporate approach covering all areas of the business, including R&D, pharmacovigilance, patient safety and quality of the medicinal product. The 2024 Double Materiality analysis highlighted patients as the company's top priority, underlining their health and safety, access to quality information, protection of their data privacy and social inclusion as the most relevant aspects. This analysis identified the most important risks, opportunities and impacts for patients, covering both internal operations and the company's value chain.

##### Risks

- **Privacy:** Increased legal sanctions and loss of patients' trust in Almirall due to potential cyber-attacks on information systems or breaches of current data protection legislation. This risk may materialize if Almirall does not properly manage the private and sensitive information of both the end users of its products, the patients who participate in clinical trials or the healthcare professionals with whom it interacts.
- **Access to quality information:** Loss of market share and decreased revenues for Almirall due to the provision of poor quality information (such as incorrect text, codes, symbols or other elements) to consumers (e.g., hospitals) and end users (patients) about its products. This risk may manifest if the company does not provide accurate and detailed information on the use, maintenance and expected results of its products, which could lead to incorrect diagnoses or inappropriate treatments.

##### Opportunities

- **Privacy:** Strengthened trust in Almirall thanks to the implementation of regulatory policies that promote the protection of patient data (Personal Data Protection Policy).
- **Access to quality information:** The provision of clear and efficient information through local call centers allows for better management of the disease by properly managing incidents and providing solutions according to Almirall's guidelines. This transparency in communication, both about product features and awareness campaigns, enhances the company's reputation, builds trust and strengthens patient loyalty.
- **Health and safety:** Integration of essential safety considerations into new products at the production sites of the value chain. This improves safety standards, mitigates risks and reinforces Almirall's commitment to quality and regulatory compliance globally.
- **Non-discrimination:** Better reputation due to the prioritization of non-discrimination practices in advertising campaigns. Ensuring equitable access to health care products and services, without discrimination based on race, gender or socio-economic status, fosters inclusion and builds trust with diverse patient groups.
- **Accessibility:** Almirall contributes to innovation in medicinal products through its R&D and collaboration with partners and government agencies, which improves access to more efficient and personalized treatments. Furthermore, its reputation as a socially responsible entity is strengthened through partnerships and donations to non-profit organizations (e.g., patient associations), facilitating better access to healthcare and improved health outcomes for different social groups.
- **Social inclusion:** Increasing Almirall's sales and reputation by adapting its pharmaceutical offerings to meet the needs of people with hearing or visual impairments. Actions such as the transcription of content, audio descriptions and sign language interpretation can improve accessibility and patient satisfaction, strengthening Almirall's position in the pharmaceutical industry.
- **Responsible marketing:** Increased attraction of patients who are motivated by sustainability attributes in their purchasing decisions due to the implementation of and proper dissemination of sustainable practices by Almirall through responsible marketing practices, as well as adherence to industry best practice guidelines (e.g., from EFPIA and local pharmaceutical industry associations).

### **Negative Impacts**

- **Child protection and safety:** Almirall's failure to adapt pharmaceutical products for children's health and safety may lead to adverse consequences for their health, exposing them to unsuitable products.
- **Responsible marketing:** Irresponsible marketing practices by Almirall, such as misleading product labelling or other false information in advertising campaigns, could result in the promotion of harmful stereotypes, such as sexist or discriminatory depictions in advertising, or the dissemination of false or misleading product information. This could undermine the integrity of the democratic process and the interests of society at large by allowing the adoption of policies and regulations that do not reflect the best interests of the community.

### **Positive impacts**

- **Privacy:** Implementation of robust data privacy policies by Almirall to protect patient information. For example, the company establishes clear mechanisms of consent for data collection and use, as well as advanced data security procedures to ensure the confidentiality and integrity of personal information.
- **Freedom of expression:** Access for patients to make enquiries or complaints about quality or other issues through Almirall's communication channels, ensuring a more informed society whose needs are met efficiently.
- **Access to quality information:** Provision of quality information for patients through the platforms, healthcare professionals and services related to Almirall's products, ensuring the accuracy, integrity and relevance of the information included in the content related to the products.
- **Health and safety:** Protection of patients by ensuring the availability of safety information, thus protecting the physical well-being of patients.
- **Child protection and safety:** Promotion of the implementation of safety measures and characteristics in the pharmaceutical products produced by Almirall, ensuring child safety in case of (accidental) contact with Almirall products.
- **Non-discrimination:** Promoting non-discrimination in Almirall's product offering, encouraging diversity and inclusion, as for example in its advertising campaigns, generating a more equitable and welcoming environment for all patients, strengthening the company's reputation and its relationship with consumers.
- **Accessibility:** Promotion of equitable and accessible access to quality pharmaceutical products by Almirall, including diversified and accessible products that reflect the varied economic, cultural and social contexts of users.
- **Responsible marketing:** Promotion of responsible marketing practices by Almirall, through ethical and truthful messages on product labels such as transparent and scientifically-based advertising content, respect for patient privacy, support for social causes and responsible use of social media, thus contributing to a positive perception of the brand and strengthening public trust in its products and services, as well as in the sector in general.

#### **5.4.2. Policies and commitments to patients**

Almirall is committed to improving the quality of life of its consumers and patients through innovative and safe solutions, always prioritizing their health and well-being. The company bases its relationship with consumers and patients on transparency, legal compliance and a strong commitment to quality and ethics at all stages of its value chain.

With a special focus on patients, Almirall promotes policies of equitable access to advanced treatments, education on their use and ongoing support. It also guarantees fair conditions, promoting equity and inclusion and ensuring a positive and sustainable impact for society.

In this way, the company has a series of policies that directly address the issues analyzed, such as impacts, risks and opportunities linked to privacy, access to quality information, health and safety, non-discrimination, product accessibility, social inclusion, responsible marketing and child protection and safety.

#### **Data Protection Policy**

It is necessary to provide the guidelines and principles to be followed in relation to the protection of personal data of Almirall's consumers and patients, within the scope of the activities carried out by the different departments and functional areas; all with the aim of ensuring compliance with the applicable laws on data protection and privacy.

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The Data Protection Policy, updated in 2024, is essential for ensuring the trust and safety of consumers and patients, who are at the heart of the company. The company implements transparent mechanisms to obtain consent for the collection and use of patient data, as well as advanced security procedures that maintain the confidentiality and integrity of personal information.

Almirall has appointed a Global Data Protection Officer (GDPO) whose responsibilities include overseeing compliance with applicable data protection laws, as well as operational policies and procedures. The GDPO also has an internal Privacy Office that assumes other functions in order to supervise the obligations related to the protection of personal data and responsibilities for related risks.

This policy responds to consumer and patient privacy, identified by the company as a key impact as well as a key risk and opportunity. There are more details on this policy in section 2.2.3 "Business conduct policies".

### **Human Rights Policy**

As mentioned above, in 2022, Almirall's Board of Directors approved and made public this policy that reflects the company's commitment to respecting international standards in this area, including respect for diversity in aspects such as race, age, gender, marital status, sexual orientation, political opinions, religion or other personal or social characteristics.

Almirall is committed to guaranteeing the human rights of consumers and patients, ensuring that its interactions are aligned with the principles set out in the United Nations Global Compact, the Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises and the key conventions of the International Labor Organization. This policy is essential for protecting the rights and dignity of consumers and patients, ensuring that they are treated fairly, safely and respectfully at all times.

Almirall's commitment extends to all its areas of activity, focusing on its relationship with consumers and patients. All of Almirall's production processes are carried out in accordance with the principles of respect for human dignity, equality and the prohibition of forced or child labor, as well as the rejection of human trafficking. These core values guide the company's business activities, promoting a fair and respectful environment.

This policy aims to comprehensively address impacts, risks and opportunities related to access to quality information, health and safety, non-discrimination, accessibility of products and treatments, social inclusion, child protection and safety, and freedom of expression towards consumers and patients. It also ensures that the company's activities meet high standards of accountability and respect for the rights of all parties involved.

The anticipation and prevention of any risks associated with human rights is the responsibility of the Senior Leadership and those responsible for each functional area, who follow the procedures set out in this Policy. 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.

### **Code of Ethics**

At Almirall, the company's values guide all our actions and define both our culture and the way we work and interact with consumers and patients. Almirall's purpose, centered around transforming the lives of people with skin diseases, is key to supporting them in achieving a healthy and fulfilling life, reflecting the company's commitment to those who rely on its products and treatments.

Almirall's conduct is governed by compliance with the applicable laws and regulations, integrity, fairness and transparency. All company employees must adhere to the standards set out in this code, which are overseen by the Chairman and CEO of the company. Global corporate policies are enforced to ensure that consumers and patients are treated in accordance with the highest ethical and professional standards.

The Code of Ethics, updated in October 2024, is based on principles that prioritize respect for inclusion, diversity, non-discrimination, social inclusion, and child protection and safety, for consumers and patients. It also guarantees data protection, security and quality in the handling of personal information. These elements are essential for ensuring that Almirall can identify and mitigate risks as well as seize opportunities, with a focus on the well-being of its patients. In addition, as a fundamental element of this code, the pharmacovigilance system is available in order to identify and correctly manage any adverse reaction situation related to products and treatments, in compliance with the applicable laws.

The company is also committed to the Principles of Good Laboratory Practice and Good Clinical Practice, ensuring that the innovation, quality, efficacy and safety of its medicines comply with all regulations. Almirall rigorously monitors the safety of its products, managing any adverse events with an established protocol, and ensuring that all of its workers and contractors are trained in order to guarantee safety at every step of the process.

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As a public company, Almirall is committed to maintaining transparency in its communications, to the benefit of the investors, general public and communities that depend on its products. The Management Board is responsible for defining the company's strategy and ensuring compliance with all laws and regulations.

### **Quality Policy**

At Almirall, the focus is on improving the health and well-being of patients, offering safe, effective and top-quality products and treatments, always with a focus on constant improvement and in strict compliance with all current pharmaceutical standards and regulations.

The Quality Policy, updated in September 2024, applies to all legal entities of the Almirall Group and all of their respective workers and is the cornerstone of the Quality Management System (QMS), which is based on the principles established by the ICH Q10 Pharmaceutical Quality System Guide of the International Council for Harmonization. This policy seeks to cover issues such as impacts, risks and opportunities related to health and safety and the accessibility of products and treatments that improve the quality of life of patients.

This Quality Management System ensures compliance with international standards at every stage in the life cycle of the company's products, from research and development to production and distribution, covering the entire portfolio. In turn, each Almirall employee plays a crucial role in the Quality Management System and must understand and integrate these principles into their daily work.

In turn, all staff are obliged to report any suspected violations of the Quality Policy in accordance with the Code of Ethics and other internal guidelines. Suspected violations can be reported to your line manager, the People & Culture department, your local Compliance or Legal representative, or through the SpeakUp! channel.

Almirall's leadership team is responsible for and committed to maintaining an efficient Quality Management System, implementing appropriate processes and procedures, under the supervision of the VP area, Global Quality Assurance. In addition, the Almirall team is committed to fostering a quality-oriented culture, ensuring that decisions are made to improve product quality and patient safety.

### **Global Corporate Promotional Compliance Policy**

As a biopharmaceutical company with an international reach, Almirall carries out promotional and non-promotional activities in various countries, engaging in a wide range of actions including the promotion of prescription and over-the-counter medicines. These activities involve interactions with health professionals, health organizations and other relevant groups.

As this is a highly regulated environment, interactions of this sort, such as sponsorships, scientific and professional meetings, hospitality, exhibitions, research and consultancy agreements, are subject to both local and international laws and regulations.

This policy thus establishes the rules for conducting promotional and non-promotional activities in an appropriate manner, which applies to Almirall S.A. and all its subsidiaries. Compliance is overseen by the Global Promotional Compliance Officer (GPCO), who reports directly to the Management Board.

Promotional activities include any action or material designed to support the promotion of or inform about the supply, sale or administration of the company's products, as well as about the company itself, directed at health professionals, health organizations, government officials and other stakeholders. On the other hand, non-promotional activities are interactions or collaborations aimed at scientific development, education and disease awareness. In addition, Almirall is a member of IFPMA, EFPIA and local pharmaceutical industry associations, and is committed to complying with the above-mentioned codes.

This policy seeks to cover aspects related to the accessibility of products and treatments, responsible marketing and access to quality information, which have been identified as impacts, risks and opportunities.

Promotional activities covered by this document include, but are not limited to:

- Sponsorship of scientific congresses and meetings of a professional or scientific nature attended by health professionals.
- Offering of samples and hospitality to health professionals.
- Activities arising from research agreements (clinical trials, studies) or other types of agreements (collaboration, consultancy, etc.).
- Interactions with patient organizations, where permitted.

In general terms, particular attention is paid to ensuring that promotional activities can only commence in a country once the necessary marketing authorizations have been granted in that country. Covert promotion is not allowed. Additionally, all promotional activities must be aligned with the approved indication(s), in line with

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the locally approved marketing authorization and the Summary of Product Characteristics (SmPC) or package leaflet.

### 5.4.3. Patient health and safety

At Almirall, our commitment to the safety of our medicines, medical devices, cosmetics and healthcare products begins in the Research and Development (R&D) department and continues throughout the life of the product.

Almirall has a Quality Assurance and Pharmacovigilance system which defines the roles, responsibilities and procedures to be followed, with the ultimate goal of ensuring the quality of the products and the safety of patients/customers. For the territories where Almirall sells its products, there are designated persons in charge of local Quality Assurance and Pharmacovigilance. The functions of the Quality Assurance department include collection of information on market quality complaints, the processing of these with the head office and/or manufacturer for evaluation and investigation. They are also the contact persons with the national health authorities in each country. On the other hand, the functions of the Pharmacovigilance department include collection of information on possible adverse reactions (side effects), the processing of these with the head office for evaluation, in addition to being the contact persons with the national authorities of each country.

#### Quality Systems

Almirall is a global pharmaceutical company dedicated to the supply of products through its own R&D efforts and agreements and partnerships aimed at providing products to improve the health and quality of life of patients, including child protection, in accordance with international quality standards in the sector and in compliance with all legal and regulatory requirements in force.

Almirall has a direct presence in most European Union countries through its own well-established subsidiaries, whose purpose is the direct marketing of Almirall products in each territory. In addition, licensing of products to external partners allows Almirall to market products in other countries around the world.

Almirall, as the holder of manufacturing, storage, transport, distribution and marketing authorization for medicines and medicinal products, complies with the legislation in force in the countries where it markets its products. In the field of medicines and medicinal products, the responsibilities of the pharmaceutical industry are clearly detailed by the applicable pharmaceutical legislation in force.

Almirall has a global quality system that pursues continuous quality improvement and covers active ingredient manufacturing plant processes, finished product, subcontracted manufacturers, suppliers of starting materials, storage and distribution services.

A significant number of international health authorities conduct regular inspections at manufacturing plants to verify that they comply with the established quality standards. The favorable results of external audits and inspections by health authorities, international bodies and customers in 2023 demonstrate Almirall's commitment to the quality and safety of its products.

The evolution of the number of external audits and inspections is as follows:

Inspection team	2022	2023	2024
Health authorities	16	19	10
External inspections by business partners	20	7	8

Table 60 Number of external audits and inspections

In 2024, a total of 18 quality inspections were managed. The inspections covered different types of products (pharmaceuticals, medical devices and cosmetics) and were conducted by inspectors from different countries, using various local and international regulations as a reference. 10 inspections were managed by different health authorities and/or certifying bodies; the rest were managed by external partners. The inspectors came from at least 14 different countries and focused on 9 different manufacturing sites (of the Almirall Group and/or subcontracted manufacturers). Almirall has a Quality Assurance and Pharmacovigilance system that defines the roles, responsibilities and procedures to be followed, with the ultimate goal of ensuring the quality of products and ensuring the safety of patients/customers in the supply, manufacturing and distribution chain of its products.

Almirall works with suppliers of starting materials and services that impact the quality of the product, all of them previously approved by Quality Assurance. Within the processes of approval and continuous verification of the quality of suppliers, annual audit plans are established for their facilities. As a reference, 85 audits were conducted in 2024 with the following distribution:

Area	Type of supplier	Year	Results		
			No. of quality audits	Favorable	Unfavorable
Manufacture		2022	87	87	0

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	Starting materials and services	2023	49	49	0
		2024	73	73	0
Commercial	Distributors and transport companies	2022	7	7	0
		2023	7	7	0
		2024	12	12	0

Table 61 Number of audits by area and rating

For the territories where Almirall distributes and markets its products, procedures exist that describe the quality system associated with local distribution, and there are people designated to be responsible for local Quality Assurance and Pharmacovigilance in each subsidiary.

#### 5.4.4. Communication Channels with Patients and End Consumers

Almirall is currently placing importance on understanding patient satisfaction through patient engagement efforts. In addition, the company emphasizes its commitment to quality and patient health and safety, as mentioned above, by managing and gathering quality complaints and queries, and addressing pharmacovigilance practices.

##### *Management of collection and evaluation of complaints and enquiries about quality*

At Almirall, priority is given to the management of complaints and enquiries about quality to ensure patient satisfaction, health and safety. The Quality Assurance department coordinates the assessment of complaints, working with central teams and manufacturers to resolve any issues. Patients can communicate their concerns through various channels, such as call centers and local offices. A specialized team analyses the information received, implementing corrective and preventive actions. This approach allows Almirall to maintain its commitment to the safety and quality of its products by continuously evaluating the efficacy of its solutions.

The functions of the Quality Assurance department include the collection of information on market quality complaints, the processing of these complaints with the head office and/or manufacturer for their evaluation and investigation, and it is the point of contact with the national health authorities of each country. There are different communication channels through which patients and users of all Almirall products can contact the company to make a complaint or an enquiry about quality. Those most commonly used are the local call center services, or direct contact via telephone or in writing with the various offices of the Almirall Group. Almirall has implemented a system of quality indicators to guarantee the efficiency of the system and the correct technical investigation of all the complaints received.

At the corporate level, within the Quality Assurance area, a multidisciplinary team of health science professionals (including mostly pharmacists and chemists) evaluates the information collected, performs the relevant investigation in each case and takes responsibility for producing investigation reports, issuing conclusions and responding to the customer who submitted the quality complaint. This team is also responsible for establishing preventive and corrective action plans to avoid their recurrence, as well as for informing the national health authorities, in the cases foreseen in the health regulations. This activity is ongoing throughout the life cycle of each drug.

There is also a Quality Operating Committee, chaired by the Global Quality Assurance Executive Director, with the active participation of the Group's industrial and business operations areas, to guarantee the necessary coordination on quality issues, as well as to sustain and develop an effective quality system in perfect alignment with the health regulations in force.

The market complaint data for the last three years are as follows:

	2022	2023	2024
No. of drug complaints (ppm)	2.8	3.3	3.8
Medicines released (units)	107,068,352	121,283,370	127,542,489
No. of complaints regarding active ingredients (ppm)	0	0	0
Active ingredients released (kg)	110,995	61,125	127,185
No. of quality inquiries received	926	1,251	1,194

Table 62 Number of complaints and enquiries about quality

As of the date this document was issued, more than 97% of the enquiries received in 2024 were answered promptly, and the rest are being processed, with the objective of closing them on schedule.

### **Pharmacovigilance systems**

Almirall works with partners and distributors worldwide to share information on the safety of its products, maintaining a centralized database to ensure compliance with current regulations. It has established clear procedures for managing incidents, reinforcing patients' confidence in its commitment to the prevention, mitigation and remediation of risks and negative impacts, as well as the management of positive impacts and opportunities.

In addition, Almirall has teams in charge of managing the Pharmacovigilance system, through which patients, consumers and product users can report suspected adverse reactions (unintended harmful response to a medicine). Almirall has enabled different communication channels, including digital media (corporate website and social networks), telephone number available both in digital media and in the package leaflet of the medicinal products, and direct contact with Almirall employees through the medical visit. The pharmacovigilance system includes the continuous monitoring of the safety profile of the medicinal products, medical devices and cosmetics of the company's product portfolio.

If a side effect/adverse reaction/incident/unwanted effect is identified in relation to our products, the measures to take include updating the product information (technical data sheet, package leaflet, etc.) and the potential recall from the market if the product's benefit-risk ratio is not considered adequate for patients/consumers. For some products it is necessary to provide additional information to that which is shown in the technical data sheet and package leaflet, this being provided for in agreement with the competent health authorities. No pharmacovigilance recalls were required during 2024.

In the Pharmacovigilance area at the corporate level, within the R&D area, we have a team of health science professionals (including doctors, pharmacists, etc.) who are responsible for properly managing any suspected adverse reactions in relation to Almirall's products. This team evaluates the information collected, performs follow-up activities if necessary, and prepares and distributes safety reports to health authorities in accordance with current guidelines. This team also ensures that the safety information in the leaflets is up-to-date at all times. This activity is ongoing from the first authorization of the product until it is cancelled and its marketing authorization suspended.

There is a corporate safety committee for medicinal products, which is responsible for making relevant decisions on safety matters as well as for ensuring compliance with legislation and the safety of patients/customers.

To guarantee the continuity of the Pharmacovigilance activity, there is a business continuity plan, activated due to the COVID-19 pandemic in 2020 and kept in place in the subsequent years, which highlights the continuity of activities through teleworking. The plan is routinely tested once a year to ensure that pharmacovigilance activities can continue as normal in the case of any eventuality.

The most significant adverse reaction metrics for the last three years are as follows:

	2022	2023	2024
No. of individual suspected cases of adverse reactions received and processed at Almirall	3,872	4,652	5,121
No. of individual suspected cases of adverse reactions reported to health authorities as required by current legislation	1,984	2,458	2,524

Table 63 Adverse reactions

The number of adverse reactions received and processed at Almirall includes individual safety information reports for all products marketed by Almirall worldwide. In addition to adverse reactions, safety communications may contain reports of lack of efficacy, abnormal laboratory test results, use outside the indications authorized in the technical data sheet, overdose, misuse, occupational exposure or exposure during pregnancy and breastfeeding, among others. Such information may be received through subsidiaries or external partners, as well as from health authorities, or obtained directly by the corporate department through scientific literature or other sources such as traditional media or digital media.

The number of adverse reactions reported to health authorities consists of individual reports of adverse reactions that meet the minimum criteria to be reported to the authorities in accordance with current legislation. Of the total safety information received, not all communications warrant expedited notification to the authorities, either because it is not required by the authority itself, or because it has been received from the authority itself. However, all information must be collected in Almirall's Pharmacovigilance system to be considered in the evaluation of the safety profile of the products.

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#### **5.4.5. Taking effective actions and approaches to mitigate risks and seize opportunities related to Patients and End-Users**

See reference to patient-related actions in the following sections: 5.4.3 “Patient health and safety”, 5.4.4 “Communication Channels with Patients and End Consumers” and 5.4.6 “Commitments to the community”. None of the actions require CAPEX and/or OPEX resources that are material to the Group’s budgets.

In addition, the Group’s Strategic Plan, which includes a pillar dedicated to patients, is set out in detail in chapter 3.1.3 “Sustainability Strategy”.

Finally, no human rights complaints have been received from patients in 2022, 2023 or 2024.

#### **5.4.6. Commitments to the community**

In its daily activity, Almirall has close ties with all those involved in the fields of research and healthcare, seeking to maintain a transparent relationship of trust with all of them. Partners such as healthcare professionals (HCPs), healthcare organizations (HCOs), patient organizations (POs) and patient advocacy groups (PAGs) play a key role in improving skin health. Activities in collaboration with these provide the Group with an invaluable opportunity to listen, learn and share. In addition, to foster a comprehensive, continuous and impactful connection with communities, the responsibility for patient engagement is entrusted to the Medical Affairs department, headed by the Vice President of International Medical Affairs.

To further improve the effectiveness of patient engagement efforts, Almirall is taking steps to proactively seek comments from its partners in order to refine and adapt its patient engagement strategies and improve patient satisfaction. This approach aims to improve the patient experience with treatments and medicines, creating a cycle of continuous improvement and confidence in Almirall’s commitment to patient care.

Specific actions have been implemented to obtain perspectives from particularly vulnerable patients, such as cooperation with institutions like IFPA and GlobalSkin, making it possible to identify and prioritize their needs in the developed strategies.

##### ***Patients and patient organizations***

Almirall supports patient organizations in accordance with the Code of Practice of the European Federation of Pharmaceutical Industries Associations (EFPIA) and national codes. Benefiting patients is at the core of all Almirall’s activities. The company strives to provide effective treatments that improve the health and quality of life of patients, in the pursuit of the well-being of patients, who are the focus of its activities. The entire operating model, from scientific innovation to product marketing, is based on understanding patients and their environment in order to provide them with the greatest possible value. The Group develops innovative drugs that address unmet needs that may have psychological implications and promotes greater awareness of little-known pathologies, such as psoriasis and atopic dermatitis, that have a significant impact on patients’ lives.

Almirall does not limit itself to the treatment of physical symptoms, but also strives to acquire an in-depth understanding of the impact of skin diseases on the emotional health and well-being of sufferers and their loved ones. To fulfil the Group’s mission, an important aspect is to raise awareness of these diseases in an attractive and relevant way. To be as close as possible to patients, we collaborate with both patient organizations and patient advocacy groups representing people with chronic skin diseases and autoimmune diseases, improving the care they receive through better support, information and services. This cooperation leads to better outcomes and experiences, and better health for all. The direct contact with these organizations reflects Almirall’s commitment to building mutual respect and trust with the dermatological community.

In 2024, we collaborated with the global patient organization IFPA (International Federation of Psoriasis Associations). Through annual sponsorship, Almirall participates in IFPA’s important mission to unite, strengthen and lead the global psoriatic disease community. By supporting IFPA, more than 60 million people worldwide living with psoriatic disease are reached. We also support IFPA’s flagship programs: World Psoriasis Day, the IFPA Forum and the IFPA Accelerator. The IFPA Forum is about people living with psoriatic disease and what is needed to address their unmet needs. The vital part of IFPA’s work is to support, through the IFPA Accelerator, the growing network of national patient organizations working to improve the lives of people with psoriatic disease. The slogan for World Psoriasis Day 2024 was “Psoriasis and the family”, and Almirall draws attention to the profound impact this condition has not only on individuals, but also on their families.

Another important partner in the patient-centric journey is GlobalSkin (International Alliance of Dermatology Patient Organizations). Almirall supported this unique global alliance, committed to improving the lives of patients worldwide, fostering relationships with members, partners and all those involved in healthcare, building a dialogue with decision makers around the world to promote patient-centric healthcare. GlobalSkin connects more than 200 Dermatology-focused patient organizations and is based on three pillars: research, advocacy



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and support. We have supported its Atopic Eczema Community in building a strong and united voice for Atopic Eczema worldwide and also actively participated in the Atopic Eczema Forum 2024.

Since 2023, Almirall has sponsored a new EUOPSO (European Federation of Psoriasis Movements) project - PSO Podcasts - which aims to raise awareness of the psychosocial burden of psoriasis and the importance of the well-being of patients and their families.

In 2024, Almirall initiated a significant collaboration with the European Federation of Allergy and Airways Diseases Patients' Associations (EFA), a European organization dedicated to improving the lives of people with allergies, atopic eczema and asthma. This collaboration aligns with Almirall's commitment to advancing patient-centered care and raising awareness of dermatological conditions.

Through this partnership, Almirall supports EFA's vision of ensuring that all people affected by these conditions have access to the highest quality of care, a safe environment and actively engage in decisions related to their health. EFA's goals focus on three key pillars: 1) Inform, by building patient evidence, capacity and momentum for change in prevention, care and participation; 2) Prevent, by promoting better prevention and innovation in European policies; and 3) Care, by advocating for timely, accessible and patient-centered care and innovation.

In addition, Almirall proudly supports World Atopic Dermatitis Day, reinforcing its dedication to improving the quality of life of atopic eczema patients and their families. By collaborating with EFA and participating in these initiatives, Almirall continues to address unmet patient needs and promote a greater understanding and awareness of chronic conditions throughout Europe.

### ***Our subsidiaries' commitment to patient organizations***

#### Spain

This year, collaboration with the patient advocacy group Acción Psoriasis has focused on three lines:

- Raising awareness of the disease, collaborating on key dates such as World Psoriasis Day, National Psoriasis Day in Spain and continuing to support the empowerment of patients with psoriasis. An example of this is the Proyecto NINA (NINA Project) film, which has been shared across the country, and post-viewing multidisciplinary roundtables have been encouraged.
- "Topicals into action", to support patients treated with topical products, their voice is essential in order to drive positive change and improvement. Acción Psoriasis has launched a survey to collect the views and experiences of 1101 patients in order to identify areas for improvement in healthcare and thus improve their quality of life.
- The *Insight* project, which aims to reach a consensus on the definition of wellness in psoriasis. A multidisciplinary approach has been undertaken that incorporates the patients' voice among dermatologists, pharmacists and psychologists.

With AADA (Asociación de Afectados por Dermatitis Atópica - Association for those Affected by Atopic Dermatitis), the company is committed to raising awareness of the disease, collaborating on World Atopic Dermatitis Day with a video showing the daily experience of suffering from AD, National AD Day with a session involving AD experts and patients to share experiences and help empower AD patients. In addition, AADA is involved in many internal projects, such as the YouFeelWell initiative.

In the field of multiple sclerosis (MS), this year saw the launch of the Proyecto Cuéntalo ['Talk about it' project], which aims to bring neurologists and patients closer together to express symptoms, thus facilitating the management of MS patients by the professionals. Among other projects, we are collaborating with regional MS patient associations in the following solidarity campaigns: the virtual MOU-TE race; the 'Una manzana por la vida' [An apple for life] campaign, which raised funds and gave visibility to the 9.000 families of patients with multiple sclerosis in Catalonia, and the *Mulla't* campaign, an event that is run in swimming pools across Spain. The group was also involved at regional level with the World and National Multiple Sclerosis Day campaigns. Almirall also collaborates with these regional associations in conducting workshops on MS symptoms, in which patients are taught techniques for optimizing exercise therapy and maintaining a routine that allows them to improve their symptoms in the medium/long term. In this regard, a series of videos have been prepared in collaboration with a regional MS society.

#### Germany

Almirall supported educational and awareness campaigns of patient organizations representing people with chronic skin diseases, autoimmune diseases or allergies. Deutscher Neurodermitis Bund e.V. (DNB) disseminated educational information for patients. We have collaborated with Deutscher Allergie-und Asthmabund (DAAB) to co-create a patient brochure. We support the patient organization Netzwerk

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Autoimmunerkrankter (NIK e.V.) and its cooperation with Derma2go, the leading expert in digital dermatology, as well as its “Skin Week” campaign dedicated to psoriasis and atopic dermatitis.

## France

In France, during 2023, Almirall supported patient associations in various contexts. We supported the France Psoriasis association on World Psoriasis Day by organizing a round table with a health professional, a psychiatrist, a psychoanalyst and a dermatologist, as well as representatives of this patient association. The purpose of the discussions was to highlight the importance of psychological aspects for the well-being of patients. The panel discussion was posted on LinkedIn as part of the World Psoriasis Day celebration.

We supported the patient organization French Eczema Association, an association fighting for a better understanding of atopic dermatitis, by supporting a patient survey on care trajectories and perceptions of the quality of care in France for this disease. The main findings of this survey were made public through the LinkedIn campaign on World Eczema Day.

The Patients and Digital Health event that we supported enabled more than twenty speakers, industrial and academic institutions, healthcare professionals, ministerial delegates and patient associations to discuss the contributions that digital tools could make to improve dermatology. Several themes marked these discussions: patient care, organization of care, collaboration between professionals and research, including artificial intelligence.

In addition to ongoing initiatives, Almirall supported several French associations of patients with Verneuil's disease (Hidradenitis Suppurativa, HS) by funding and organizing a comprehensive study involving 1,200 patients. The study focused on understanding the expectations and perceptions around this debilitating condition. As a result of this collaboration, the study has already produced five publications, including several in the Journal of the European Academy of Dermatology and Venereology (JEADV), as well as numerous abstracts presented at international and French conferences.

Beyond the study itself, the connections fostered through this partnership have enabled one of the patient associations to join a European expert committee led by Almirall. This committee aimed to design an early phase clinical trial protocol for a potential biological treatment for HS. By ensuring the integration of patients' perspectives at the earliest stages of clinical development, Almirall reaffirmed its commitment to placing patients at the center of its innovation efforts, particularly to address unmet medical needs in rare and challenging conditions.

## Italy

Almirall continues its commitment to patient-centered initiatives by sponsoring the DERMA-POINT portal, a project validated by dermatological specialists and Scientific Societies (SIDEMAST). This platform is designed to inform, educate and support patients in the management of conditions such as psoriasis, atopic dermatitis and actinic keratosis. By means of self-assessment tools and educational content, the portal improves awareness about the diseases and screening efforts, enabling a more timely care and better access to treatment. The initiative is sponsored in collaboration with APIAFCO (Associazione Psoriasici Italiani Amici della Fondazione Corazza) and L'ADIPSO (Associazione per la Difesa degli Psoriasici).

In addition, Almirall supported a press conference on World Psoriasis Day at the Senate of the Republic. This event brought together representatives from the scientific-academic community and patient associations (ADIPSO and APIAFCO) to discuss legislative measures promoted by the Parliamentary Intergroup on Skin Diseases, with a specific focus on psoriasis. The conference served as a platform to gather ideas and suggestions for further improving patient care and advocacy efforts.

In 2024, Almirall also initiated a collaboration with ANDEA (Associazione Nazionale Dermatite Atopica), an association of patients with atopic dermatitis, in conjunction with the launch of Ebglyss. This collaboration includes a multi-faceted project that involves a patient survey, a multi-stakeholder advisory board and a comprehensive report. The goal is to identify the key patient needs and co-create solutions to improve the patient journey for those living with atopic dermatitis, reflecting Almirall's dedication to addressing unmet patient needs through collaborative efforts.

## United Kingdom

In 2023, as part of National Eczema Week, the patient organization National Eczema Society (NES) produced patient podcasts with the help of funding from Almirall and other organizations. They vividly explained the impact of atopic dermatitis and helped to understand the condition from the patient's perspective. Each episode explored the issues through real-life experiences and shows the importance of managing the condition.

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Another activity organized together with NES has been the Patient Forum, which aims to encompass diverse patient experiences, broaden patient perspectives and discuss emotional challenges and well-being concerns to improve overall patient satisfaction and ensure a holistic approach to their atopic dermatitis journey.

### Netherlands

Almirall sponsored the National Institutional Eczema Project (NCEP), which brings together all stakeholders in eczema care. The aim is to provide information, training and tools to both patients and healthcare professionals, make tools available, disseminate them and implement them. This has been done in a unique way that closely involves the patient association and all parties that directly or indirectly provide care. As a result, the project provides information and support tools that can be used throughout the country, which for Almirall is a further step in its commitment to support patient access to care and healthcare professionals, as well as patient education.

### Denmark

Almirall financially supported the project of the patient organization Atopisk Eksem Forening, which aims to raise awareness about reducing the referral time for dermatological treatments, including a meeting organized in the Danish national parliament. Almirall also provided a financial grant to support Professor Tove Agner's new book campaign on atopic dermatitis for patients, healthcare professionals and parents.

### Sweden and Norway

Almirall conducted surveys in collaboration with the psoriasis patient organization "Psoriasisförbundet" in Sweden and "Psoriasis og Eksem Forbundet", the psoriasis and atopic eczema patient organization in Norway, focusing on patients' quality of life, well-being and satisfaction with the treatment received. The aim is to collect the first data on the well-being of Swedish and Norwegian patients with psoriasis, to raise awareness among patients and dermatologists, as well as political society, about the importance of patient well-being.

Almirall supported the conference of the Swedish regional patient organization "Psoriasisforeningen Halland". The aim was to raise awareness of the burden and unmet needs of psoriasis patients and to discuss with regional politicians the future of patient care.

### United States

Not only is Almirall committed to improving the well-being of patients through its innovative therapies, it also advocates for disease awareness to help patients prevent these pathologies. In the United States, Almirall has partnered with the Skin Cancer Foundation, an organization dedicated to empowering people with resources for the prevention, detection and treatment of skin cancer. For the second year in a row, the company has contributed a donation of €10,000 through our YouFeelWell challenge.

## **Global medical associations**

### International Psoriasis Council

The overall goal of this Council is to raise the standard of care and treatment of psoriasis worldwide, focusing on providing personalized care that optimizes long-term quality of life and reduces the risk of comorbidities for affected individuals.

**Euromelanoma** is a European network of dermatologists whose aim is to promote and share information on the prevention, early diagnosis and treatment of skin cancer. Almirall is one of the key sponsors of its patient awareness campaigns. In addition, in 2023 we launched the 2nd World AK (Actinic Keratosis) Day campaign with its support.

During 2023, Almirall also sponsored activities of **SCOPE**, a pan-European organization for skin care in organ transplant patients, to support further education and meetings aimed at scientific exchange between physicians and basic scientists working on skin problems in organ transplant patients.

## **Strategic partners**

Almirall believes that agreements with other companies help to offer a balanced and competitive product portfolio and also serve to enhance their business growth. Almirall is, therefore, continuously looking for collaborations and associations that will enhance its R&D capabilities, expand the pipeline and help it achieve its objectives. The strategic partnerships cover the entire drug value chain and allow the company to share efforts, resources and risks for the purpose of discovering innovative treatments in the medical dermatology field. The most relevant strategic partners at the end of the year ended 31 December 2024 are as follows:

### Commercial area

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- **Sun Pharma:** the laboratory that owns Ilumetri (a biologic therapy for patients with moderate to severe plaque psoriasis), for which the Group has marketing rights in Europe.
- **Lilly:** laboratory that owns Ebglyss (an innovative biologic therapy for patients with atopic dermatitis) for which the Group has marketing rights in Europe and which was approved by the EMA in November 2023.
- **MC2 Therapeutics:** the laboratory from which the Group acquired marketing rights for Europe and which is marketed under the brand name Wyzora™ (except in Austria, where it is marketed under the brand name Winxory™) indicated for mild to moderate plaque psoriasis in adults, including the scalp.

#### Research and Development

- **Evotec:** a multi-target partnership in medical dermatology in which both partners will contribute pharmacological targets to the research process. The partnership will combine Evotec's fully integrated multimodal platform with Almirall's expertise in medical dermatology. Evotec is responsible for drug discovery and preclinical development using its fully integrated AI/ML-based EVOiR&D platform. For its part, Almirall leads the clinical development and marketing.
- **Ichnos Science:** the biotechnology company from which the Group acquired the global rights to develop and market ISB 880, an IL-1RAP antagonist, a monoclonal antibody for autoimmune diseases. Ichnos will retain the rights to antibodies targeting the IL-1RAP pathway for oncology indications.
- **Simcere:** the pharmaceutical company from which the Group acquired exclusive development and marketing rights for SIM0278 (worldwide except China), the IL-2 mutant fusion protein (IL-2Mu-Fc) developed by Simcere and drug candidate for the treatment of autoimmune diseases.
- **Etherna:** an mRNA/NPLi technology platform company, with which the Group has announced a multi-target alliance to research and develop novel mRNA-based therapies for serious skin diseases, including non-melanoma skin cancer.
- **Absci:** a generative AI drug creation company, with which the Group has signed an agreement with the aim of collaborating in the discovery, development and commercialization of AI-engineered therapies (Absci's Integrated Drug Creation™ platform) to treat chronic and debilitating dermatological diseases.
- **Novo Nordisk:** licensing agreement for the rights to NN-8828 for the use thereof in various fields, including immune-mediated inflammatory skin diseases. NN-8828 is an IL-21 blocker that inhibits IL-21-induced pathophysiological functions in several immunomodulatory diseases.
- **Eloxx Pharmaceuticals:** licensing agreement for rights to ZKN-013, including its use in orphan dermatological diseases. ZKN-013 is a potentially promising oral drug for reading nonsense mutations, which allows host cells to produce functional proteins that counteract the root cause of these rare dermatological diseases and potentially others.

#### **Associations and health authorities**

Almirall complies rigorously with all legal and administrative processes required by the health authorities in all areas of activity. Moreover, it collaborates with associations to develop health-related projects. Almirall is a member of the European Federation of Pharmaceutical Industries and Associations (EFPIA) and the International Federation of Pharmaceutical Manufacturers & Associations (IFPMA), among others.

In all of these relationships, the information provided to the associations, along with the company's scientific knowledge, are used to develop products with the highest degree of safety and effectiveness to maximize patient well-being. The Group seeks to extend its commitment to all its partners and suppliers in the value chain in order to form solid relationships based on integrity, trust and transparency.

Almirall also carries out several awareness campaigns on various pathologies with the aim of making patients aware of how to control the symptoms of the diseases they suffer from and to raise awareness among the general public of the impact these diseases have on the people who suffer from them.

In addition, Almirall also participates in the AMR Action Fund, a fund created by leading pharmaceutical companies and organized by the IFPMA with the support of the WHO, the EIB and the Wellcome Trust. The objective of the fund is to combat antibiotic resistance to infectious diseases. This fund aims to generate 2 to 4 new antibiotics by 2030, investing more than \$1 billion in small biotechnology companies and providing industry expertise to create the conditions needed to facilitate the clinical development of new antibiotics.

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The following is a list of the main associations of which Almirall or its subsidiaries are members, as well as the contribution made to each of them. In total, the Group made contributions in 2024 for a total amount of €2,166 thousand (€1,962 thousand in 2023), including:

- **International Federation of Pharmaceutical Manufacturers & Associations (IFPMA):** in partnership with the global healthcare community, IFPMA promotes policies that encourage innovation, resilient regulatory systems and high-quality standards; advocates ethical practices; and champions sustainable healthcare policies to meet the needs of patients and the healthcare system. In 2024, the Group contributed €211 thousand (€201 thousand in 2023).
- **European Federation of Pharmaceutical Industries and Associations (EFPIA):** represents the biopharmaceutical industry operating in Europe. Through its direct members, 36 national associations, 39 leading pharmaceutical companies and a growing number of small and medium-sized enterprises (SMEs), EFPIA's mission is to create a collaborative environment that enables its members to innovate, discover, develop and deliver new therapies and vaccines for people across Europe, and to contribute to the European economy. In 2024, the Group contributed €327 thousand (€305 thousand in 2023).
- **Farmaindustria (Spain):** is the National Business Association of the Pharmaceutical Industry established in Spain, and it represents the associated laboratories before society and its Public Administrations, collaborates with them, promotes the sector's commitment to R&D, conveys the reality of the pharmaceutical industry to the public and offers companies value-added services. In 2024, the Group contributed €195 thousand (€178 thousand in 2023).
- **Verband der Chemischen Industrie (Germany):** The German Chemical Industry Association represents the economic policy interests of chemical and pharmaceutical companies in Germany. As the voice of industry-wide economic policy, the association discusses with other stakeholders, elected officials and authorities, the scientific community and non-governmental organizations the optimal design of framework conditions in Germany as an industrial location. In 2024, the Group contributed €262 thousand (€246 thousand in 2023).
- **Bundesverband der Arzneimittel-Hersteller (BAH, Germany):** The German Association of Pharmaceutical Manufacturers (BAH) is the main trade organization of the pharmaceutical industry in Germany. It represents the interests of some 400 member companies, which maintain around 80,000 jobs in Germany. In addition to drug manufacturers, BAH members are also pharmacists, lawyers, publishers and agencies, as well as market research and opinion institutions. BAH advocates safe and responsible self-medication through professional medical and pharmaceutical advice. It therefore strongly supports the legal protection of the incumbent pharmacy as the primary institution for distribution. In 2024, the Group contributed €149 thousand (€154 thousand in 2023).

### **Non-Governmental organizations**

Almirall works with several non-profit organizations to promote activities, offer services and fund projects that they consider fundamental for the social development of the most disadvantaged populations and regions. For example, the company maintains close relationships with patient organizations and patient advocacy groups, as discussed in detail, collaborating on projects and placing the company's expertise at their disposal. This makes it possible to have a complete picture of their needs, the conditions surrounding their diseases, and the emotional and social barriers they face.

Almirall only makes donations, contributions and sponsorships to institutions, organizations or associations that are made up of healthcare professionals and/or provide healthcare or conduct research, subject in all cases to the following requirements:

- They must be made for the purpose of supporting healthcare or research;
- They must be validated and authorized internally beforehand, correctly documented on the basis of the corresponding prior contract, and the data of the corresponding beneficiaries duly identified and recorded;
- They must not be intended to induce the recommendation, prescription, purchase, dispensing, sale or administration of specific drugs; and
- They do not violate either the applicable local regulations or the ethical commitments assumed by the sector.

In 2024, donations amounting to €270 thousand were made (€408 thousand in 2023) to various foundations, universities and health centers, mainly in Italy, Germany and Spain. Almirall does not allow donations and grants that benefit individual medical professionals.

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#### **5.4.7. Main patient-related goals and targets**

Almirall's goals and objectives are patient-centered, with wellness as a key pillar in its clinical trials. The company is committed to integrating sustainability considerations into its research, development and innovation processes, ensuring that the needs and quality of life of patients are at the center of its efforts. In the long term, Almirall seeks not only to develop more effective treatments, but also to encourage a more responsible and ethical approach to healthcare by proactively managing its current and future material impacts.

As part of its 2024-2030 Sustainability Strategy, Almirall is committed to establishing at least one Advisory Board per year with a high level of impact. These Boards will review the company's ongoing projects, providing perspectives that ensure decisions are aligned with patients' needs.

In addition, the company considers sustainability at every stage of research, innovation and development. A target has been set for 90% of partnerships to comply with a sustainability policy by 2026-2027, reflecting the importance of assessing the status of the sustainability certifications and qualifications of current and future partners in order to meet the sustainability expectations of patients and consumers.

Finally, Almirall has set itself an ambitious target in terms of direct impact on patients' lives through its strategic dermatological portfolio. The company aims to significantly increase the number of patients benefiting from its innovative dermatology treatments, including key products such as Ebglyss, Ilumetri, Klisyri and Wyzora. These treatments are designed to address specific dermatological needs, improving the quality of life of patients suffering from chronic skin conditions.

Almirall's goal is to have at least 731 thousand patients benefiting from its strategic portfolio of dermatological products by 2024.

This strategic approach underlines Almirall's ability to innovate in key therapeutic areas, whilst responsibly managing its impacts on the healthcare sector and responding to the sustainability expectations of its patients and consumers.

The company is actively working to refine patient-related goals to align with its long-term vision of expanding access to effective dermatological treatments. This process involves a continuous assessment of patient needs, market demands and the impact of its current initiatives. By focusing on delivering high-quality medical solutions, Almirall remains committed to improving the health and well-being of patients, whilst addressing the challenges of an ever-evolving global healthcare landscape.

Almirall is committed to a process of continuous learning, regularly evaluating its performance to draw key lessons and identify areas for improvement. This approach ensures the adoption of more effective practices aligned with the needs of consumers and end-users, thus reinforcing its long-term strategy.

Almirall is working on a more robust framework to comprehensively address target setting and to involve consumers, patients, their legitimate representatives or credible intermediaries in setting targets and monitoring performance. Relevant information, including updates on this process, will be disclosed upon completion, reflecting Almirall's dedication to transparency and alignment with evolving reporting standards.

## **6. ABOUT THIS REPORT**

### **6.1. Scope of the report**

This report covers the period from 1 January to 31 December 2024, corresponding to Almirall's financial year, and has been prepared in accordance with the ESRS, which were adopted as Delegated Acts by the European Commission on 31 July 2023 and published in the Official Journal of the EU on 22 December 2023.

The first application of these reporting standards was 1 January 2024. In the sections where historical data appears, figures for the last three years (2022-2024) have been included and some figures may have been restated as a result of the change in regulations, as until 2023 Almirall reported under selected GRI standards. Where such a change is relevant, it has been indicated in the relevant section of this report.

In this regard, it should be noted that the European Directive has not finally been transposed at the Spanish State level, and therefore Spanish Law 11/2018, of 28 December, remains in force. As a consequence, although this report has been prepared under CSRD criteria, certain data required by Law 11/2018 have been maintained (in those cases where the CSRD does not cover the requirement, the GRI criteria used in previous years have been followed). Section 6.3 "List of ESRS requirements included in the report" provides details of the correspondence of the sections with the ESRS topics, whilst section 6.4 "Index of contents required by Law

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11/2018 of 28 December” explains which section they are located in and which ESRS covers that aspect (if any).

For the purposes of this report, Almirall S.A. and all its subsidiaries are referred to as ‘Almirall’, ‘the Group’, or ‘the Company’. The information reported includes all subsidiaries of the Group, which can be found in the Appendix to the Consolidated Financial Statements for the year ended 31 December 2024.

The financial information included in this report is derived from the Consolidated Financial Statements for the year ended 31 December 2024.

The indicators included in this report have been compiled by Almirall. The system used to obtain information guarantees methodological rigor and allows for historical comparisons. The members of its value chain have also been taken into account.

Almirall incorporates the content of this non-financial information in this Management Report. In addition, it prepares an Annual Report, a document that reports on its social and environmental policies, as well as its commitment and performance in sustainability and ESG. In it, the Group provides detailed information on its actions with regard to the issues described above.

## 6.2. Principles of preparation

Almirall has prepared this report under the regulatory framework included in the new ESG reporting ecosystem, which establishes stricter standards in environmental, social and corporate governance matters and is based on the principle of double materiality. The method for determining Almirall’s reporting materiality is defined in chapter Double materiality assessment of this report.

This regulatory framework includes the Corporate Sustainability Reporting Directive (CSRD) and the requirements applicable to the European Sustainability Reporting Standards (European Sustainability Reporting Standards, ESRS), developed by the European Financial Reporting Advisory Group (EFRAG), and adopted as delegated acts on 31 July 2023.

The Group’s Management has prepared this report on the basis of the best information available at the reporting date. Throughout the report, where data from external sources, estimates or certain assumptions have been used in the calculations, these have been indicated in the respective section. Also, if there are uncertainties that could affect the calculation of an indicator, they have been disclosed in the same way.

Finally, disclosure requirements, for data included in cross-cutting standards and topical standards derived from other EU legislation, have been indicated in the respective section, as described in Appendix B of ESRS 2. Where no specific reference has been made, this is because it is not material.

## 6.3. List of ESRS requirements included in the report

Below is a list of the disclosure requirements included in the report and where they are located:

ESRS topic	Disclosure requirement	Section of the report
ESRS 2 - General Disclosures	BP-1: General basis for preparation of the sustainability statement	6.1
		6.2
ESRS 2 - General Disclosures	BP-2: Disclosures in relation to specific circumstances	6.1
		6.2
ESRS 2 - General Disclosures	GOV-1: The role of the administrative, management and supervisory bodies	2.1.1
		2.1.2
		2.1.3
ESRS 2 - General Disclosures	GOV-2: Information provided to and sustainability matters addressed by the undertaking’s administrative, management and supervisory bodies	2.1.2
		2.1.4
		3.1
ESRS 2 - General Disclosures	GOV-3: - Integration of sustainability-related performance in incentive schemes	3.1.4

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<b>ESRS topic</b>	<b>Disclosure requirement</b>	<b>Section of the report</b>
ESRS 2 - General Disclosures	GOV-4: Statement on due diligence	4.1.3
ESRS 2 - General Disclosures	GOV-5: Risk management and internal controls over sustainability reporting	2.1.4
ESRS 2 - General Disclosures	SBM-1: Strategy, business model and value chain	1 3.1.3 3.2.4
ESRS 2 - General Disclosures	SBM-2: Interests and views of stakeholders	3.2.5
ESRS 2 - General Disclosures	SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model	3.2.6
ESRS 2 - General Disclosures	IRO-1: Description of the processes to identify and assess material impacts, risks and opportunities	3.2.7
ESRS 2 - General Disclosures	IRO-2: Disclosure requirements in ESRS covered by the company's sustainability statement	6.2
ESRS 2 - General Disclosures	MDR-P: Policies adopted to manage material sustainability matters	2.2.3
ESRS 2 - General Disclosures	MDR-A: Actions and resources in relation to material sustainability matters	3.1.4
ESRS 2 - General Disclosures	MDR-M: Metrics in relation to material sustainability matters	3.1.5 3.1.6
ESRS 2 - General Disclosures	MDR-T: Tracking effectiveness of policies and actions through targets	3.1.4
E1 – Climate Change	GOV–3: Integration of sustainability-related performance in incentive schemes	4.3.1
E1 – Climate Change	SBM–3: Material impacts, risks and opportunities and their interaction with strategy and business model	4.3.2
E1 – Climate Change	IRO-1: Description of the processes to identify and assess material impacts, risks and opportunities	4.3.2
E1 – Climate Change	E1-1: Transition plan to mitigate the impact of climate change	4.3.3
E1 – Climate Change	E1-2: Policies related to climate change mitigation and adaptation	4.3.4
E1 – Climate Change	E1-3: Actions and resources in relation to climate change policies	4.3.5
E1 – Climate Change	E1-4: Targets related to climate change mitigation and adaptation	2.3.5 4.3.5
E1 – Climate Change	E1-5: Energy consumption and energy mix	4.3.6
E1 – Climate Change	E1-6: Gross scope 1, 2 and 3 emissions and total GHG emissions	4.3.7
E1 – Climate Change	E1-7: GHG removals and GHG mitigation projects financed through carbon credits	4.3.8
E1 – Climate Change	E1-8: Internal carbon pricing system	4.3.9
E2 – Pollution	IRO-1: Description of the processes to identify and assess material impacts, risks and opportunities	4.4.1
E2 – Pollution	E2-1: Policies related to pollution	4.4.2



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<b>ESRS topic</b>	<b>Disclosure requirement</b>	<b>Section of the report</b>
E2 – Pollution	E2-2: Actions and remedies related to pollution	4.4.3
E2 – Pollution	E2-3: Targets related to pollution	4.4.3
E2 – Pollution	E2-4: Pollution of air, water and soil	4.4.4 4.4.5 4.4.6
E2 – Pollution	E2-6: Potential financial effects from pollution-related impacts, risks and opportunities	4.4.3
E3 – Water and marine resources	IRO-1: Description of the processes to identify and assess material impacts, risks and opportunities	4.5.1
E3 – Water and marine resources	E3-1: Policies related to water and marine resources	4.5.2
E3 – Water and marine resources	E3-2: Actions and resources related to water and marine resources	4.5.3
E3 – Water and marine resources	E3-3: Targets related to water and marine resources	4.5.3
E3 – Water and marine resources	E3-4: Water consumption	4.5.4
E4 - Biodiversity and ecosystems	SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model	4.6.1
E4 - Biodiversity and ecosystems	IRO-1: Description of the processes to identify and assess material impacts, risks and opportunities	4.6.1
E4 - Biodiversity and ecosystems	E4-1: Transition plan and consideration of biodiversity and ecosystems in strategy and business model	4.6
E4 - Biodiversity and ecosystems	E4-2: Policies related to biodiversity and ecosystems	4.6.2
E4 - Biodiversity and ecosystems	E4-3: Actions and resources related to biodiversity and ecosystems	4.6.3
E4 - Biodiversity and ecosystems	E4-4: Targets related to biodiversity and ecosystems	4.6.3
E4 - Biodiversity and ecosystems	E4-5: Impact metrics related to biodiversity and ecosystem change	4.6.3
E5 - Resource use and circular economy	IRO-1: Description of the processes to identify and assess material impacts, risks and opportunities	4.7.1
E5 - Resource use and circular economy	E5-1: Policies related to resource use and circular economy	4.7.2
E5 - Resource use and circular economy	E5-2: Actions and resources related to resource use and circular economy	4.7.3
E5 - Resource use and circular economy	E5-3: Targets related to resource use and circular economy	4.7.3
S1 - Own Workforce	SBM-2: Interests and views of stakeholders	5.2.1
S1 - Own Workforce	SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model	5.2.1
S1 - Own Workforce	S1-1: Policies related to own workforce	5.2.2

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<b>ESRS topic</b>	<b>Disclosure requirement</b>	<b>Section of the report</b>
S1 - Own Workforce	S1-2: Processes for engaging with own workers and workers' representatives about impacts	5.2.3
S1 - Own Workforce	S1-3: Processes to remediate negative impacts and channels for own workers to raise concerns	5.2.4
S1 - Own Workforce	S1-4: Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workers, and effectiveness of those actions	5.2.5
S1 - Own Workforce	S1-5: Targets related to managing material negative events, advancing positive impacts and managing material risks and opportunities	5.2.5
S1 - Own Workforce	S1-6: Characteristics of the company's employees	5.2.7
S1 - Own Workforce	S1-7: Characteristics of non-employees in the company's own workforce	5.2.9
S1 - Own Workforce	S1-8: Coverage of collective bargaining and social dialogue	5.2.3
S1 - Own Workforce	S1-9: Diversity metrics	5.2.10
S1 - Own Workforce	S1-10: Adequate wages	5.2.11
S1 - Own Workforce	S1-11: Social protection	5.2.12
S1 - Own Workforce	S1-12: People with disabilities	5.2.10
S1 - Own Workforce	S1-13: Training and skills development metrics	5.2.13
S1 - Own Workforce	S1-14: Health and safety metrics	5.2.14
S1 - Own Workforce	S1-15: Work-life balance metrics	5.2.15
S1 - Own Workforce	S1-16: Remuneration metrics (pay gap and total remuneration)	5.2.16
S1 - Own Workforce	S1-17: Incidents, complaints and severe human rights impacts	5.2.17
S2 – Workers in the value chain	SBM-2: Interests and views of stakeholders	5.3.1
S2 – Workers in the value chain	SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model	5.3.1
S2 – Workers in the value chain	S2-1: Policies related to value chain workers	5.3.2
S2 – Workers in the value chain	S2-2: Processes for engaging with value chain workers about impacts	5.3.3
S2 – Workers in the value chain	S2-3: Processes to remediate negative impacts and channels for value chain workers to raise concerns	5.3.3
S2 – Workers in the value chain	S2-4: Taking Action on material impacts, and approaches to mitigating material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions and approaches	5.3.2
S2 – Workers in the value chain	S2-5: Targets related to managing material negative events, advancing positive impacts and managing material risks and opportunities	2.3.5 5.3.4
S4 - Consumers and end-users	SBM-2: Interests and views of stakeholders	5.4.1

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ESRS topic	Disclosure requirement	Section of the report
S4 - Consumers and end-users	SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model	5.4.1
S4 - Consumers and end-users	S4-1: Policies related to consumers and end-users	5.4.2
S4 - Consumers and end-users	S4-2: Processes for engaging with consumers and end-users about impacts	5.4.4 5.4.6
S4 - Consumers and end-users	S4-3: Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	5.4.2 5.4.3
S4 - Consumers and end-users	S4-4: Taking action on material impacts on consumers and end-users, and approaches to mitigating material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	5.4.5
S4 - Consumers and end-users	S4-5: Targets related to managing material negative events, advancing positive impacts and managing material risks and opportunities	5.4.7
G1 - Business conduct	GOV-1: The role of the administrative, management and supervisory bodies	2.1.1 2.1.2 2.1.3
G1 - Business conduct	IRO-1: Description of the processes to identify and assess material impacts, risks and opportunities	3.2
G1 - Business conduct	G1-1: Corporate culture and business conduct policies	2.2.1 2.2.3 5.1
G1 - Business conduct	G1-3: Prevention and detection of corruption or bribery	2.2.4
G1 - Business conduct	G1-4: Confirmed incidents of corruption or bribery	2.2.4

## 6.4. Index of contents required by Law 11/2018 of 28 December

Below is the table with all the contents required by law that the Group's management has considered material for the purposes of this report, unless expressly mentioned:

Areas	Content	Related ESRS Standards	Section in the report and page where it starts
<b>Business model</b>	Brief description of the group's business model, including: 1) its business environment, 2) its organization and structure, 3) the markets in which it operates, 4) its objectives and strategies, 5) the main factors and trends that may affect its future development.	NEIS2 GOV-1 NEIS2 GOV-2 NEIS2 SBM-1 NEIS2 SBM-2 NEIS2 SBM-3 NEIS2 MDR-P G1-1	1 Introduction to the company, Page 6 2.1 Corporate Governance, Page 7
<b>Policies</b>	A description of the group's policies with respect to these matters, including: 1) due diligence procedures applied for identification, assessment, prevention and mitigation of significant risks and impacts - verification and control procedures, including the measures adopted.	NEIS2 MDR-P E1-2 E2-1 E3-1 E4-2 E5-1 G1-1 S1-1 S2-1 S4-1	2.2.3 Business conduct policies, Page 15 4.3.4 Policies related to climate change mitigation and adaptation 5.2.2 Policies related to own workforce
<b>Short-, medium- and long-term risks</b>	The principal risks associated with the group's activities in relation to these issues, including, where relevant and proportionate, any of its business relationships, products or services that might have an adverse impact in the group's activities in relation to those areas; and - how the group manages said risks,		2.1.4 Risk management, Page 12

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Areas	Content	Related ESRS Standards	Section in the report and page where it starts
	<ul style="list-style-type: none"> <li>- explaining the procedures used to detect and assess them in accordance with the national, European or international reference frameworks for each matter.</li> <li>- Information should be included on the impacts that have been identified, providing a breakdown of these impacts, in particular the main short-, medium- and long-term risks.</li> </ul>		
<b>Environmental issues</b>	<b>Global Environment</b>		
	1) Detailed information on the current and foreseeable effects of the company's activities on the environment and, where appropriate, health and safety, environmental assessment or certification procedures;	NEIS2 MDR-A NEIS2 IRO-1 E1-3 E2-2 E3-2 E4-3 E5-2	4.1 Environmental management, Page 51
	2) Resources dedicated to the prevention of environmental risks;		
	3) The application of the precautionary principle, the amount of provisions and guarantees for environmental risks. (e.g. derived from the environmental liability law)		
	<b>European Taxonomy</b>		
	Regulation (EU) 2020/852 containing the fundamentals of the common European classification system for environmentally sustainable economic activities, in particular delegated acts for climate change mitigation and adaptation.	N/A	4.2 European Taxonomy, Page 54
	<b>Pollution</b>		
	Measures to prevent, reduce or remediate carbon emissions that seriously affect the environment, taking into account any form of activity-specific atmospheric pollution, including noise and light pollution.	NEIS2 MDR-T NEIS2 MDR-A E2-2 E2-3	4.4 Pollution, Page 70
	<b>Circular economy and waste prevention and management</b>		
	Circular economy	NEIS 2 MDR-A E5-2	4.7 Resource use and circular economy, Page 78
	Waste: Measures for prevention, recycling, reuse, other forms of recovery and disposal of waste;		
	Actions to combat food waste.		Non-material
	<b>Sustainable use of resources</b>		
	Water consumption and water supply according to local constraints;	E3-4	4.5.4 Water consumption, Page 74
	Consumption of raw materials and measures taken to improve the efficiency of their use;	E5-4	4.7.5 Consumption of starting materials, Page 82
	Direct and indirect energy consumption, measures taken to improve energy efficiency and the use of renewable energies.	NEIS 2 MDR-A E1-3 E1-5	4.3.6 Energy, Page 64
	<b>Climate change</b>		
The significant elements of greenhouse gas emissions generated as a result of the company's activities, including the use of the goods and services it produces;	E1-6	4.3 Climate Change, Page 58	
Measures taken to adapt to the consequences of climate change;	NEIS 2 MDR-A E1-1 E1-3 E1-7 E1-8		
The reduction targets voluntarily established in the medium and long term to reduce greenhouse gas emissions and the means implemented for this purpose.	NEIS 2 MDR-T E1-1 E1-4		
<b>Protecting biodiversity</b>			
Measures taken to preserve or restore biodiversity;	NEIS2 MDR-A E4-3	4.6 Biodiversity and ecosystems, Page 77	
Impacts caused by activities or operations in protected areas.	E4-5		
<b>Social and worker-related issues</b>	<b>Employment</b>		
	Total number and distribution of employees by gender, age, country and job classification;	S1-6 S1-9 GRI 405-1	5.2.7 Workforce profile, Page 96  5.2.10 Diversity and inclusion, Page 100
	Total number and distribution of employment contracts,		5.2.7 Workforce profile, Page 96  7.1 Breakdown of employees, Page 147
	Average annual number of permanent contracts, temporary contracts and part-time contracts by gender, age and professional classification,		7.1 Breakdown of employees, Page 147
Number of dismissals by gender, age and professional classification;	S1-6 GRI 401-1	7.1.2 Layoffs, Page 148	

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Areas	Content	Related ESRS Standards	Section in the report and page where it starts
	Average remunerations and their evolution disaggregated by gender, age and professional classification or equal value; Pay gap, the remuneration of equal or average jobs in society,	S1-16 GRI 405-2	5.2.11 Adequate wages, Page 102  5.2.16 Pay Equity Criteria and Pay Gap at Almirall, Page 115  7.1.3 Remuneration, Page 148
	The average remuneration of directors and executives, including variable remuneration, allowances, indemnities, payments to long-term savings schemes and any other payments broken down by gender,	S1-16	7.1.3 Remuneration, Page 148
	Implementation of work disconnection policies,	NEIS2 MDR-P S1-1	5.2.2 Policies related to own workforce, Page 88
	Employees with disabilities.	S1-12	5.2.10 Diversity and inclusion, Page 100
<b>Work organization</b>			
	Organization of working time	NEIS2 MDR-P S1-1	5.2.2 Policies related to own workforce, Page 88
	Number of absence hours	S1-14 GRI 403-9	5.2.8 Employee satisfaction and engagement (turnover and absenteeism rates), Page 98
	Measures aimed at facilitating the enjoyment of work-life balance and encouraging the co-responsible exercise of these rights by both parents.	NEIS2 MDR-T NEIS2 MDR-A S1-4 Metrics S1-5 Targets S1-15	5.2.3 Processes for engaging with own workers and workers' representatives, collective bargaining and social dialogue, Page 93  5.2.12 Social protection, Page 103
<b>Health and safety</b>			
	Health and safety conditions at work;	S1-11 S1-14	5.2.14 Safety, health and wellbeing, Page 109
	Occupational accidents, in particular their frequency and seriousness, Occupational diseases, disaggregated by gender.	S1-14	5.2.14 Safety, health and wellbeing, Page 109
<b>Social relationships</b>			
	Organization of social dialogue, including procedures for informing, consulting and negotiating with employees;	S1-2	5.2.3 Processes for engaging with own workers and workers' representatives, collective bargaining and social dialogue, Page 93
	Percentage of employees covered by collective agreement by country;	S1-8	
	The balance of collective agreements, particularly in the field of health and safety at work.	S1-8	
	Mechanism and procedure available to the company to promote the involvement of workers in the management of the company, in terms of information, consultation and participation	S1-3	
<b>Training</b>			
	The policies implemented in the area of training;	NEIS2 MDR-P S1-1	5.2.13 Talent development and training, Page 104
	The total number of training hours per professional category.	S1-13	
	<b>Universal accessibility for people with disabilities</b>	NEIS2 MDR-A S1-4 S1-12	5.2.10 Diversity and inclusion, Page 100
<b>Equality</b>			
	Measures taken to promote equal treatment and opportunities for women and men;	NEIS2 MDR-T NEIS2 MDR-A S1-4 Metrics S1-5 Targets	5.2.4 Processes to remediate negative impacts and channels for own workers to raise concerns, Page 94
	Equality plans (Chapter III of Organic Law 3/2007, of 22 March, for the effective equality of women and men), measures adopted to promote employment, protocols against sexual and gender-based harassment, integration and universal accessibility for people with disabilities;	NEIS2 MDR-P NEIS2 MDR-A S1-1 S1-4	5.2.10 Diversity and inclusion, Page 100
	The policy against all types of discrimination and, where appropriate, diversity management.	NEIS2 MDR-P S1-1	5.2.2 Policies related to own workforce, Page 88  5.2.10 Diversity and inclusion, Page 100

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Areas	Content	Related ESRS Standards	Section in the report and page where it starts
<b>Human rights</b>	Implementation of human rights due diligence procedures Prevention of risks of human rights violations and, where appropriate, measures to mitigate, manage and redress possible abuses;	NEIS GOV 4 S1-3 S2-4 S4-4	2.2.3, Page Business conduct policies, Page 15
	Complaints of human rights violations;	S1-17	5.2.17 Human Rights Incidents and Complaints, Page 117
	Promotion and enforcement of the provisions of the core conventions of the International Labor Organization related to respect for freedom of association and the right to collective bargaining;	NEIS2 MDR-P S1-1 S2-1	2.2.3 Business conduct policies, Page 15  5.2.17 Human Rights Incidents and Complaints, Page 117
	The elimination of discrimination in respect of employment and occupation;		
	The elimination of forced or compulsory labor;		
	The effective abolition of child labor.		
<b>Corruption and bribery</b>	Measures taken to prevent corruption and bribery	G1-3	2.2.4 Prevention and detection of corruption or bribery, Page 20
	Measures to combat money laundering		
	Contributions to foundations and non-profit entities	GRI 2-28	5.4.6 Commitments to the community, Page 128
<b>Social issues</b>	<b>Company's commitment to sustainable development</b>		
	The impact of the company's activity on employment and local development;	GRI 2-28 GRI 2-29	5.4.6 Commitments to the community, Page 128
	The impact of the company's activity on local populations and in the territory;		
	The relations maintained with local community actors and the modalities of dialogue with them;		
	Partnership or sponsorship actions.		
	<b>Subcontracting and suppliers</b>		
	The inclusion of social, gender equality and environmental issues in the purchasing policy;	S2-1 S2-2 S2-3 S2-4	2.3 Sustainable supply chain, Page 23
	Consideration in relations with suppliers and subcontractors of their social and environmental responsibility;		
	Monitoring systems and audits and their results.		
	<b>Consumers</b>		
	Measures for the health and safety of consumers;	NEIS2 MDR-T NEIS2 MDR-A S4-4 Metrics S4-5 Targets	5.4.3 Patient health and safety, Page 125  5.4.4 Communication Channels with Patients and End Consumers, Page 126
Complaint systems, complaints received and their resolution.			
<b>Tax information</b>			
Earnings obtained on a country-by-country basis;	GRI 207-4 GRI 201-4 with respect to subsidies	2.4 Responsible taxation, Page 29	
Taxes on profits paid			
Public subsidies received			

## 6.5. Requirements not included at the date of publication of this report

As of the date of this report and after having carried out the double materiality exercise (see section 3.2.10 “Results”) and the identification of Impacts, Risks and Opportunities (see 3.2.6 “Identification of IROs”); Almirall is working on the incorporation of the following requirements:

### Environment

ESRS	Requirement	Datapoint	Justification
E1 – Climate Change	E1-3 Actions and resources in relation to climate change	29. The company:  (c) relate the significant monetary amounts of CapEx and OpEx necessary to implement the actions taken or	No information is provided on current and future financial resources as they

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ESRS	Requirement	Datapoint	Justification
	policies. Metrics and targets	planned with: i. the relevant line items or notes to the financial statements; ii. the key performance indicators required under Commission Delegated Regulation (EU) 2021/2178; and iii. where applicable, the CapEx plan required under Commission Delegated Regulation (EU) 2021/2178	are not significant in relation to Almirall's overall budgets
E1 – Climate Change	E1-5 Energy consumption and energy mix	43. The company shall disclose the reconciliation with the relevant line item(s) or notes to the financial statements of the amount of net income from activities in sectors with a high climate impact (the denominator in the calculation of energy intensity required in paragraph 40).	No information is provided on current and future financial resources as they are not significant in relation to the Group's budgets
E1 – Climate Change	E1-8 Internal carbon pricing system	62. The company shall disclose whether it applies internal carbon pricing systems and, if so, how they support its decision-making and incentivize the implementation of climate-related policies and targets.	The company is currently analyzing the implementation of an internal carbon pricing mechanism in 2025 with the objective of reducing indirect Scope 3 emissions related to business travel
E1 – Climate Change	E1-9 Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	67-79 Calculation guidance: expected financial effects from material physical risks	The regulation allows the disclosure of these datapoints to be omitted during the first year of preparing the sustainability statement
E2 – Pollution	E2-3 Targets related to pollution	23. The information required in section 20 shall indicate whether and how the targets relate to the prevention and control of: (a) air pollutants and related specific loads; (b) emissions to water and related specific loads; (c) soil pollution and related specific loads; and (d) substances of concern and very high concern	Information on how the targets relate to the prevention and control of air pollutants and related specific loads is not included in this report because they are not significant in relation to Almirall's overall budgets
E2 – Pollution	E2-6 Potential financial effects from pollution-related impacts, risks and opportunities	40. The information provided pursuant to paragraph 38(a) shall include:  b) investments in assets and operating and fixed costs incurred in the reporting period together with significant impacts and deposits;	The regulation allows the disclosure of these datapoints to be omitted during the first year of preparing the sustainability statement (40a is omitted specifically).
E4 Biodiversity and Ecosystems	E4-3 Actions and resources related to biodiversity and ecosystems	27. The description of key actions and resources shall be in accordance with the mandatory content defined in ESRS 2 MDR-A. Actions and resources in relation to material sustainability issues.	The company is currently making efforts to update its biodiversity-related actions in order to promote the care and preservation of biodiversity in relation to its own operations and its value chain

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ESRS	Requirement	Datapoint	Justification
E4 Biodiversity and Ecosystems	E4-3 Actions and resources related to biodiversity and ecosystems	<p>28. In addition, the company</p> <p>b) will disclose whether it used biodiversity offsets in its action plans. If the actions contain biodiversity offsets, the company shall include the following information: i. the purpose of the offset and the key performance indicators used; ii. the financial effects (direct and indirect costs) of the biodiversity offsets in monetary terms; and iii. a description of the offsets including the area, type and quality criteria applied and the standards that the biodiversity offsets fulfil</p> <p>c) describe whether and how it has incorporated local and indigenous knowledge and nature-based solutions into biodiversity and ecosystem-related actions.</p>	The company is currently making efforts to update its biodiversity-related actions in order to promote the care and preservation of biodiversity in relation to its own operations and its value chain
E4 Biodiversity and Ecosystems	E4-4 Targets related to biodiversity and ecosystems	32. The information required by paragraph 29 shall include the following: a) whether ecological thresholds and impact allocations were applied to the company in setting the targets. b) to f) with respect to biodiversity target setting	The company is currently making efforts to update its biodiversity-related actions in order to promote the care and preservation of biodiversity in relation to its own operations and its value chain
E5 - Resource use and circular economy	E5-3 Targets related to resource use and circular economy	<p>24. The information required in paragraph 21 shall indicate whether and how the company's targets relate to inputs and outputs of resources, including waste and products and materials, and, more specifically, to:</p> <p>a) Circular product design</p> <p>b) Increasing the rate of circular use of materials</p> <p>c) Minimization of primary materials</p> <p>d) Supply and sustainable uses</p> <p>e) Waste management</p>	The company is in the process of collecting information and data to meet the relevant targets
E5 - Resource use and circular economy	E5-3 Targets related to resource use and circular economy	25. The company shall specify to which level of the waste hierarchy the target refers	The company is in the process of collecting information and data in order to comply
E5 - Resource use and circular economy	E5-4 Resource inflows	30. The disclosure required in paragraph 28 shall include a description of its resource inflows where material: products (including packaging) and materials (specification of key raw materials and rare earths), water and property, plant and equipment used in the company's own operations and upstream in its value chain.	The company is in the process of collecting information and data to meet the relevant targets
E5 - Resource use and circular economy	E5-4 Resource inflows	31. Where a company assesses that resource inflows are a material sustainability issue, it shall disclose the	The company is in the process of collecting



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ESRS	Requirement	Datapoint	Justification
circular economy		following information on the materials used to manufacture the company's products and services during the reporting period, in tons or kilograms	information and data in order to comply
E5 - Resource use and circular economy	E5-4 Resource inflows	32. The company shall provide information on the methods used to calculate the data. Specify whether the data are derived from direct measurements or estimates and disclose the main assumptions used.	The company is in the process of collecting information and data in order to comply
E5 - Resource use and circular economy	E5-5 Resource outflows	35. The company shall provide a description of key products and materials from the company's production process that are designed according to circular principles, such as durability, reusability, reparability, disassembly, remanufacturing, reconditioning, recycling, recirculation through the biological cycle or optimization of the use of the product or material through other circular business models.	The company is in the process of collecting information and data in order to comply
E5 - Resource use and circular economy	E5-5 Resource outflows	36. Companies for which outputs are material shall disclose: a) the expected durability of the products that the company has placed on the market, relative to the industry average for each product group; b) the reparability of products, using an established rating system, where possible; c) the percentages of recyclable content in products and their packaging.	The company is in the process of collecting information and data in order to comply

### Social

ESRS	Requirement	Datapoint	Justification
S1 - Own workforce	S1-4 Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	31. The objective of this disclosure requirement is twofold. Firstly, it is to provide an understanding of any actions or initiatives through which the company seeks to:  The company shall provide a summary description of the action plans and resources to manage its material impacts, risks and opportunities related to workers in the value chain according to ESRS 2 MDR-A. Actions and resources in relation to material sustainability matters	Information on current and future financial resources and other resources allocated to the action plan (Capex and Opex) is not included in this report, as they are not significant in relation to Almirall's overall budgets
S1 - Own workforce	S1-7 Characteristics of non-employees in the company's own workforce	54. The purpose of this disclosure requirement is to provide information about the company's approach to employment, including the extent and nature of incidents arising from its employment practices, to provide contextual information that facilitates understanding of information reported in other disclosures, and to serve as a basis	The company is in the process of collecting information and data in order to comply

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ESRS	Requirement	Datapoint	Justification
		for calculating the quantitative parameters to be disclosed under other disclosure requirements of this Standard. It also provides an understanding of the extent to which the company relies on non-employees in its own workforce	
S1 - Own workforce	S1-13 Training and skills development metrics	83. a) The percentage of employees that participated in regular performance and career development reviews; this information shall be broken down by gender;	The company is in the process of collecting information and data in order to comply
S2 – Workers in the value chain	S2-4 Taking Action on material impacts, and approaches to mitigating material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions and approaches	31. The objective of this disclosure requirement is twofold. Firstly, it is to provide an understanding of any actions or initiatives through which the company seeks to:  The company shall provide a summary description of the action plans and resources to manage its material impacts, risks and opportunities related to workers in the value chain according to ESRS 2 MDR-A. Actions and resources in relation to material sustainability matters	Information on current and future financial resources and other resources allocated to the action plan (Capex and Opex) is not included in this report, as they are not significant in relation to Almirall's overall budgets
S4 - Consumers and end-users	S4-4 Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	31. The objective of this disclosure requirement is twofold. Firstly, it is to provide an understanding of any actions or initiatives through which the company seeks to:  The company shall provide a summary description of the action plans and resources to manage its material impacts, risks and opportunities related to workers in the value chain according to ESRS 2 MDR-A. Actions and resources in relation to material sustainability matters	Information on current and future financial resources and other resources allocated to the action plan (Capex and Opex) is not included in this report, as they are not significant in relation to Almirall's overall budgets

**General information**

ESRS	Requirement	Datapoint	Justification
IRO-2	Disclosure requirements in ESRS covered by the company's sustainability statement	56. The company shall also include a table of all data points deriving from other EU legislation included in Appendix B to this standard, indicating where they can be found in the sustainability statement and including those that the company has deemed not to be material, in which case the company shall indicate this.	As described in the section 6.2, it is not material to the company

## 7. APPENDICES

### 7.1. Other social indicators

#### 7.1.1. Breakdown of employees

The breakdown of employees by country, professional category, gender and age at the end of each year is shown below (the number at year-end has been taken into account rather than the average given that the difference between the average annual number and the number at year-end is less than 5%).

The most common type of hiring at Almirall is permanent/indefinite contracts, with an incidence of 98%.

Category	Gender	31/12/2023		31/12/2024	
		Permanent	Temporary	Permanent	Temporary
Directors	Women	41	0	45	0
	Men	63	0	67	0
Middle management	Women	89	0	97	1
	Men	101	0	106	0
Specialists / Professionals	Women	594	11	675	13
	Men	450	4	483	5
Administrative staff/Workers	Women	269	17	252	11
	Men	253	12	261	10
<b>Group Total</b>		<b>1,860</b>	<b>44</b>	<b>1,986</b>	<b>40</b>

Table 64 Breakdown of employees by type of contract, category and gender (the "Other" and "Undeclared" categories are not shown because all amounts are zero)

The breakdown of the type of contract by country is shown below for 31 December 2024:

Country	Full-time permanent				Part-time permanent				Full-time temporary				Part-time temporary			
	Women	Men	Others	Not declared	Women	Men	Others	Not declared	Women	Men	Others	Not declared	Women	Men	Others	Not declared
Spain	667	626	0	0	6	2	0	0	13	12	0	0	0	0	0	0
Germany	170	137	0	0	13	9	0	0	4	3	0	0	4	1	0	0
United States	53	30	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Italy	50	50	0	0	0	0	0	0	1	0	0	0	0	0	0	0
United Kingdom	18	11	0	0	1	0	0	0	0	0	0	0	0	0	0	0
Switzerland	10	6	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Netherlands	8	1	0	0	0	0	0	0	0	1	0	0	0	0	0	0
Austria	9	7	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Belgium	9	6	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Nordic countries	8	6	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Portugal	8	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Poland	5	1	0	0	0	0	0	0	1	0	0	0	0	0	0	0
France	29	17	0	0	0	0	0	0	0	0	0	0	0	0	0	0
China	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Czech Republic	5	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0

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Country	Full-time permanent				Part-time permanent				Full-time temporary				Part-time temporary			
	Women	Men	Others	Not declared	Women	Men	Others	Not declared	Women	Men	Others	Not declared	Women	Men	Others	Not declared
Slovak Republic	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>1,051</b>	<b>904</b>	<b>0</b>	<b>0</b>	<b>20</b>	<b>11</b>	<b>0</b>	<b>0</b>	<b>19</b>	<b>16</b>	<b>0</b>	<b>0</b>	<b>4</b>	<b>1</b>	<b>0</b>	<b>0</b>

Table 65 Breakdown of workforce by type of contract, country and gender

### 7.1.2.Layoffs

The following involuntary severances of contracts at Almirall took place during the 2023 and 2024 financial years. The following table shows the details of their classification by gender, age and occupational classification (only involuntary terminations are included regardless of the type of contract):

Professional category	2023			2024		
	Women	Men	Total	Women	Men	Total
Directors	0	4	4	0	1	1
Middle management	1	1	2	1	2	3
Specialists / Professionals	25	21	46	12	12	24
Administrative/Manual Workers	9	6	15	4	1	5
<b>Group Total</b>	<b>35</b>	<b>32</b>	<b>67</b>	<b>17</b>	<b>16</b>	<b>33</b>

Table 66 Dismissals by professional category and gender (the "Other" and "Undeclared" categories are not shown because all amounts are zero)

Age	2023			2024		
	Women	Men	Total	Women	Men	Total
< 30	3	5	8	1	1	2
30 - 50	19	11	30	9	9	18
> 50	13	16	29	7	6	13
<b>Group Total</b>	<b>35</b>	<b>32</b>	<b>67</b>	<b>17</b>	<b>16</b>	<b>33</b>

Table 67 Dismissals by age and gender (the "Other" and "Undeclared" categories are not shown because all amounts are zero)

### 7.1.3.Remuneration

Below is a table with a breakdown of the total remuneration received in 2023 and 2024 in the Group, broken down by gender, category and age, based on the workers at the close of these years.

The total compensation included herein includes the annual base salary in force on 31 December at 100% - without a reduced workday- and the short-term target at 100%, both amounts for the corresponding year.

Remuneration is reported in euros, using the exchange rates published by the European Central Bank to convert those paid in foreign currency for each reporting period.

The following two tables do not include the compensation package for the Chairman of the company.

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Category (€)	Gender	2023	2024
Directors	Women	193,994	201,399
	Men	245,981	266,718
	Average	225,287	240,212
Middle management	Women	113,905	123,525
	Men	125,507	134,852
	Average	120,072	129,410
Specialists / Professionals	Women	75,910	81,950
	Men	80,161	84,601
	Average	77,732	83,050
Administrative staff/Workers	Women	43,777	48,269
	Men	40,445	44,516
	Average	42,174	46,364
<b>Group Total</b>	<b>Women</b>	<b>74,963</b>	<b>82,488</b>
	<b>Men</b>	<b>85,077</b>	<b>91,565</b>
	<b>Average</b>	<b>79,651</b>	<b>86,661</b>

Table 68 Remuneration by category and gender (the "Other" and "Undeclared" categories are not shown because all amounts are zero)

Age (years)	Gender	2023	2024
< 30	Women	48,261	52,376
	Men	42,742	47,945
	Average	45,700	50,215
30 - 50	Women	76,155	82,228
	Men	74,587	78,317
	Average	75,490	80,566
> 50	Women	79,039	86,021
	Men	103,883	113,236
	Average	91,819	99,736
<b>Group Total</b>	<b>Women</b>	<b>74,963</b>	<b>82,488</b>
	<b>Men</b>	<b>85,077</b>	<b>91,565</b>
	<b>Average</b>	<b>79,651</b>	<b>86,661</b>

Table 69 Remuneration by age and gender (the "Other" and "Undeclared" categories are not shown because all amounts are zero)

The following table shows the average gross remuneration received in 2023 and 2024 by the members of the Board of Directors and members of the Management Board of the Almirall Group:

Body (€)	2023		2024	
	Women	Men	Women	Men
Board of Directors <sup>(1) (3)</sup>	123,333	214,927	124,375	292,389
Management Board <sup>(2)(3)</sup>	426,642	759,638	546,055	737,547

Table 70 Remuneration of Senior Management (the "Other" and "Undeclared" categories are not shown because all amounts are zero)

- 1) For the Board of Directors, all the remuneration associated with the position of each member plus the amounts associated with the committees of which they were members during the year are considered remuneration. The CEO (a male) is included in the company's board of directors.
- 2) The remuneration of the Management Board includes the base salary received during the year, short-term incentives (STI) and long-term incentives (LTI) paid in March of the year and all salary supplements (seniority, school allowances, rental allowances, car allowances and other extraordinary bonuses). This does not include severance payments.
- 3) For the average gross remuneration received by the members of the Board of Directors and members of the Group's Management Board, the cash criterion has been considered, as opposed to how it has been represented in the Consolidated Financial Statements, the latter being the accrual criterion.

For further information regarding the remuneration of the Board of Directors and the members of the Management Board of the Almirall Group, we refer to the Annual Corporate Governance Report and the Annual Remuneration Report, appendices II and III of the Consolidated Management Report.

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## 7.2. Tables of indicators of economic activities that comply with EU taxonomy

Listed below are the templates attached in the annexes to delegated regulation 2023/2486 published by the European Commission on 27 June 2023.

### 7.2.1. Turnover

2024

2024				Substantial contribution criteria						Criteria for absence of material damage										
Economic activities	Codes	Net turnover	% current year	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Minimum guarantees	Proportion of financial year 2023	Category facilitating activity	Transition activity	
<b>A. ELIGIBLE ACTIVITIES ACCORDING TO TAXONOMY</b>																				
<b>A.1 Environmentally sustainable activities (conforming to the taxonomy)</b>																				
Total A.1		0	0.0%	0%	0%	0%	0%	0%	0%											N/A
Of which facilitators			0.0%																	N/A
Of which transitional			0.0%																	N/A
<b>A.2 Taxonomy-eligible but not environmentally sustainable activities (activities that do not comply with the taxonomy)</b>																				
Manufacture of active pharmaceutical ingredients (APIs) or active substances	PPC 1.1	10,266	1.0%	N/EL	N/EL	N/EL	EL	N/EL	N/EL											0.7%
Drug manufacturing	PPC 1.2	715,023	72.5%	N/EL	N/EL	N/EL	EL	N/EL	N/EL											66.1%
Turnover of taxonomy-eligible but not environmentally sustainable activities (activities that do not comply with the taxonomy) (A.2)		725,289	73.6%	0%	0%	0%	73.6%	0%	0%											66.8%
Turnover from eligible activities according to the taxonomy (A.1+A.2)		725,289	73.6%	0%	0%	0%	73.6%	0%	0%											66.8%
<b>B INELIGIBLE ACTIVITIES ACCORDING TO THE TAXONOMY</b>																				
Turnover from ineligible activities according to the taxonomy (B)		260,432	26.4%																	
<b>TOTAL</b>		<b>985,721</b>	<b>100.0%</b>																	

	Ratio turnover Total turnover	
	which conforms to the taxonomy by objective	eligible according to taxonomy by objective
CCM	N/A	0.0%
CCA	N/A	0.0%
WTR	N/A	0.0%
CE	N/A	0.0%
PPC	N/A	73.6%
BIO	N/A	0.0%

2023

2023				Substantial contribution criteria						Criteria for absence of material damage									
Economic activities	Codes	Net turnover	% current year	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Minimum guarantees	Proportion of financial year 2022	Category facilitating activity	Transition activity
<b>A. ELIGIBLE ACTIVITIES ACCORDING TO TAXONOMY</b>																			
<b>A.1 Environmentally sustainable activities (conforming to the taxonomy)</b>																			
Total A.1		0	0.0%	0%	0%	0%	0%	0%	0%									N/A	
Of which facilitators			0.0%															N/A	
Of which transitional			0.0%															N/A	
<b>A.2 Taxonomy-eligible but not environmentally sustainable activities (activities that do not comply with the taxonomy)</b>																			
Manufacture of active pharmaceutical ingredients (APIs) or active substances	PPC 1.1	6,686	0.7%	N/EL	N/EL	N/EL	EL	N/EL	N/EL									N/A	
Drug manufacturing	PPC 1.2	590,912	66.1%	N/EL	N/EL	N/EL	EL	N/EL	N/EL									N/A	
Turnover of taxonomy-eligible but not environmentally sustainable activities (activities that do not comply with the taxonomy) (A.2)		597,598	66.8%	0%	0%	0%	66.8%	0%	0%									N/A	
Turnover from eligible activities according to the taxonomy (A.1+A.2)		597,598	66.8%	0%	0%	0%	66.8%	0%	0%									N/A	
<b>B INELIGIBLE ACTIVITIES ACCORDING TO THE TAXONOMY</b>																			
Turnover from ineligible activities according to the taxonomy (B)		296,918	33.2%																
<b>TOTAL</b>		<b>894,516</b>	<b>100.0%</b>																

	Ratio turnover Total turnover	
	which conforms to the taxonomy by objective	eligible according to taxonomy by objective
CCM	N/A	0.0%
CCA	N/A	0.0%
WTR	N/A	0.0%
CE	N/A	0.0%
PPC	N/A	66.8%
BIO	N/A	0.0%

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7.2.2.Capex  
2024

2024				Substantial contribution criteria						Criteria for absence of material damage									
Economic activities	Codes	CapEx	% current year	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Minimum guarantees	Proportion of financial year 2023	Category facilitating activity	Transition activity
<b>A. ELIGIBLE ACTIVITIES ACCORDING TO TAXONOMY</b>																			
<b>A.1 Environmentally sustainable activities (conforming to the taxonomy)</b>																			
CapEx of environmentally sustainable activities (conforming to the taxonomy) (A.1)		0	0.0%	0%	0%	0%	0%	0%	0%								N/A		
Of which facilitators			0.0%														N/A		
Of which transitional			0.0%														N/A		
<b>A.2 Taxonomy-eligible but not environmentally sustainable activities (activities that do not comply with the taxonomy)</b>																			
Manufacture of active pharmaceutical ingredients (APIs) or active substances	PPC 1.1	2,502	1.8%	N/EL	N/EL	N/EL	EL	N/EL	N/EL								1.9%		
Drug manufacturing	PPC 1.2	21,183	15.4%	N/EL	N/EL	N/EL	EL	N/EL	N/EL								7.3%		
Installation, maintenance and repair of renewable energy technologies	CCM 7.6	891	0.6%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.5%		
CapEx of the taxonomy-eligible but not environmentally sustainable activities (activities that do not comply with the taxonomy) (A.2)		24,576	17.8%	0.6%	0%	0%	17.2%	0%	0%								9.7%		
CapEx of eligible activities according to taxonomy (A.1+A.2)		24,576	17.8%	0.6%	0%	0%	17.2%	0%	0%								9.7%		
<b>B INELIGIBLE ACTIVITIES ACCORDING TO THE TAXONOMY</b>																			
CapEx of ineligible activities according to taxonomy (B)		113,210	82.2%																
<b>TOTAL</b>		<b>137,786</b>	<b>100.0%</b>																

	Ratio CapEx/ Total CapEx	
	which conforms to the taxonomy by objective	eligible according to taxonomy by objective
CCM	0%	0.6%
CCA	N/A	0.0%
WTR	N/A	0.0%
CE	N/A	0.0%
PPC	N/A	17.2%
BIO	N/A	0.0%



2023

2023				Substantial contribution criteria						Criteria for absence of material damage									
Economic activities	Codes	CapEx	% current year	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Minimum guarantees	Proportion of financial year 2022	Category facilitating activity	Transition activity
<b>A. ELIGIBLE ACTIVITIES ACCORDING TO TAXONOMY</b>																			
<b>A.1 Environmentally sustainable activities (conforming to the taxonomy)</b>																			
CapEx of environmentally sustainable activities (conforming to the taxonomy) (A.1)		0	0.0%	0%	0%	0%	0%	0%	0%									N/A	
Of which facilitators			0.0%															N/A	
Of which transitional			0.0%															N/A	
<b>A.2 Taxonomy-eligible but not environmentally sustainable activities (activities that do not comply with the taxonomy)</b>																			
Manufacture of active pharmaceutical ingredients (APIs) or active substances	PPC 1.1	4,832	1.9%	N/EL	N/EL	N/EL	EL	N/EL	N/EL									N/A	
Drug manufacturing	PPC 1.2	18,618	7.3%	N/EL	N/EL	N/EL	EL	N/EL	N/EL									N/A	
Installation, maintenance and repair of renewable energy technologies	CCM 7.6	1,360	0.5%	EL	N/EL	N/EL	N/EL	N/EL	N/EL									0.4%	
CapEx of the taxonomy-eligible but not environmentally sustainable activities (activities that do not comply with the taxonomy) (A.2)		24,810	9.7%	0.5%	0%	0%	9.2%	0%	0%									N/A	
CapEx of eligible activities according to taxonomy (A.1+A.2)		24,810	9.7%	0.5%	0%	0%	9.2%	0%	0%									N/A	
<b>B INELIGIBLE ACTIVITIES ACCORDING TO THE TAXONOMY</b>																			
CapEx of ineligible activities according to taxonomy (B)		230,928	90.3%																
<b>TOTAL</b>		<b>255,738</b>	<b>100.0%</b>																

	Ratio CapEx/ Total CapEx	
	which conforms to the taxonomy by objective	eligible according to taxonomy by objective
CCM	0%	0.5%
CCA	0%	0.0%
WTR	N/A	0.0%
CE	N/A	0.0%
PPC	N/A	9.2%
BIO	N/A	0.0%

Translation of a report originally issued in Spanish.  
In the event of discrepancy, the Spanish language version prevails.

7.2.3.Opex  
2024

2024				Substantial contribution criteria						Criteria for absence of material damage										
Economic activities	Codes	OpEx	% current year	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Minimum guarantees	Proportion of financial year 2023	Category facilitating activity	Transition activity	
<b>A. ELIGIBLE ACTIVITIES ACCORDING TO TAXONOMY</b>																				
<b>A.1 Environmentally sustainable activities (conforming to the taxonomy)</b>																				
OpEx of the environmentally sustainable activities (conforming to the taxonomy) (A.1)		0	0.0%	0%	0%	0%	0%	0%	0%											N/A
Of which facilitators			0.0%																	N/A
Of which transitional			0.0%																	N/A
<b>A.2 Taxonomy-eligible but not environmentally sustainable activities (activities that do not comply with the taxonomy)</b>																				
Manufacture of active pharmaceutical ingredients (APIs) or active substances	PPC 1.1	3,553	3.1%	N/EL	N/EL	N/EL	EL	N/EL	N/EL											5.3%
Drug manufacturing	PPC 1.2	14,590	12.6%	N/EL	N/EL	N/EL	EL	N/EL	N/EL											12.9%
Installation, maintenance and repair of renewable energy technologies	CCM 7.6	6	0.0%	EL	N/EL	N/EL	N/EL	N/EL	N/EL											0.0%
OpEx of the taxonomy-eligible but not environmentally sustainable activities (activities that do not comply with the taxonomy) (A.2)		18,149	15.7%	0.0%	0%	0%	15.7%	0%	0%											18.2%
OpEx of eligible activities according to taxonomy (A.1+A.2)		18,149	15.7%	0.0%	0%	0%	15.7%	0%	0%											18.2%
<b>B INELIGIBLE ACTIVITIES ACCORDING TO THE TAXONOMY</b>																				
OpEx of ineligible activities according to taxonomy (B)		98,052	84.3%																	
<b>TOTAL</b>		<b>116,201</b>	<b>100.0%</b>																	

	Ratio OpEx/ Total OpEx	
	which conforms to the taxonomy by objective	eligible according to taxonomy by objective
CCM	0%	0.0%
CCA	N/A	0.0%
WTR	N/A	0.0%
CE	N/A	0.0%
PPC	N/A	15.7%
BIO	N/A	0.0%

2023

2023				Substantial contribution criteria						Criteria for absence of material damage										
Economic activities	Codes	OpEx	Proportion of financial year 2023	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Minimum guarantees	Proportion of financial year 2022	Category facilitating activity	Transition activity	
<b>A. ELIGIBLE ACTIVITIES ACCORDING TO TAXONOMY</b>																				
<b>A.1 Environmentally sustainable activities (conforming to the taxonomy)</b>																				
OpEx of the environmentally sustainable activities (conforming to the taxonomy) (A.1)		0	0.0%	0%	0%	0%	0%	0%	0%											N/A
Of which facilitators			0.0%																	N/A
Of which transitional			0.0%																	N/A
<b>A.2 Taxonomy-eligible but not environmentally sustainable activities (activities that do not comply with the taxonomy)</b>																				
Manufacture of active pharmaceutical ingredients (APIs) or active substances	PPC 1.1	5,482	5.3%	N/EL	N/EL	N/EL	EL	N/EL	N/EL											N/A
Drug manufacturing	PPC 1.2	13,411	12.9%	N/EL	N/EL	N/EL	EL	N/EL	N/EL											N/A
Installation, maintenance and repair of renewable energy technologies	CCM 7.6	31	0.0%	EL	N/EL	N/EL	N/EL	N/EL	N/EL											0.1%
OpEx of the taxonomy-eligible but not environmentally sustainable activities (activities that do not comply with the taxonomy) (A.2)		18,924	18.2%	0.0%	0%	0%	18.2%	0%	0%											N/A
OpEx of eligible activities according to taxonomy (A.1+A.2)		18,924	18.2%	0.0%	0%	0%	18.2%	0%	0%											N/A
<b>B INELIGIBLE ACTIVITIES ACCORDING TO THE TAXONOMY</b>																				
OpEx of ineligible activities according to taxonomy (B)		84,968	81.8%																	
<b>TOTAL</b>		<b>103,892</b>	<b>100.0%</b>																	

	Ratio OpEx/ Total OpEx	
	which conforms to the taxonomy by objective	eligible according to taxonomy by objective
CCM	0%	0.0%
CCA	0%	0.0%
WTR	N/A	0.0%
CE	N/A	0.0%
PPC	N/A	18.2%
BIO	N/A	0.0%