

GLOBAL CORPORATE POLICY

Almirall SpeakUp! Channel

Effective date	12 December 2023
Approved use	

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1. Purpose

This Corporate Policy sets out the rules for the Almirall SpeakUp! channel.

2. Scope

This Corporate Policy applies throughout Almirall.

Almirall S.A and all Spanish subsidiaries have in place a local Affiliate Policy in accordance with the applicable Spanish regulations. In case of contradiction, the [Spanish Affiliate Policy](#) will take preference over this Policy for Almirall S.A. and Spanish subsidiaries only.

In the event an external third party is engaged by Almirall in relation to the activity or purpose described by this Policy, they should abide by this Policy to the extent applicable.

3. Policy elements

The Almirall SpeakUp! channel constitutes Almirall's internal mechanism for raising concerns. The SpeakUp! channel shall observe the following elements:

- Almirall SpeakUp! shall be available for Almirall staff and external stakeholders to report facts that may constitute a breach of the applicable laws, all criminal or administrative offences, and breaches of the Code of Ethics or internal policies of Almirall.
- Each Almirall legal entity shall appoint SpeakUp! Managers, who shall be in charge of managing and processing the reports received and supervising the related investigations (Reports).
- SpeakUp! Managers shall act independently and shall have all the personal and material resources necessary to carry out their duties. Almirall will ensure the absence of conflicts of interest of SpeakUp! Managers, in relation to the facts that are the subject of the Reports managed and processed.
- Almirall shall ensure that multiple channels for submitting Reports are in place in addition to the SpeakUp! channel. The channels in place shall be secure, confidential, and easily accessible, enabling to make Reports orally or in writing. Oral reporting shall be possible by telephone or through other voice messaging systems, and, upon request by the Reporting person, by means of a physical meeting within a reasonable timeframe.

- All Reports submitted through the Almirall SpeakUp! channel shall be treated confidentiality. Reports submitted anonymously will be treated with the same degree of protection, confidentiality and care as all other Reports submitted.
- Reports shall be processed within reasonable timeframes in accordance with the applicable laws, not exceeding in any case three (3) months from the acknowledgment of receipt sent to the Reporting person. This period may be extended under reasonable grounds in cases of complexity.

Almirall SpeakUp! System shall observe the following rights and guarantees:

- Confidentiality: The identity of the person submitting a Report (Reporter) shall not be disclosed to anyone beyond the authorized staff members competent to receive or follow up on reports, unless authorized by law and provided that appropriate safeguards are adopted.
- Non-retaliation: any form of retaliation, including threats of retaliation and attempts of retaliation, against a Reporter, co-workers or family members who submit a Report in good faith, shall be prohibited.
- Data protection: Any processing of personal data carried out in Almirall SpeakUp! shall be carried out in accordance with the applicable data privacy regulations. Personal data which are manifestly not relevant for the handling of a specific Report shall not be collected or, if accidentally collected, shall be deleted without undue delay.
- External Reporting Channels: The Reporter shall be provided with clear and easily accessible information regarding the procedures for reporting externally to competent authorities, according to local regulations.
- Record keeping: Reports shall be stored confidentially just for the strictly necessary time to comply with the requirements imposed by the applicable laws on the protection of Reporting persons or other applicable laws.
- The rights to the presumption of innocence, right to honor, to defense, to be informed about the investigation of the Reporter shall be observed and guaranteed in cases submitted through Almirall SpeakUp! channel. The right to be informed about the investigation shall not be considered as an absolute right and shall be applied to the extent its exercise is not detrimental to the case or to the rights of the Reporter.

Failure to comply with this Policy may result in disciplinary sanctions or other appropriate action.

4. Governance

Corporate Policy Sponsor: [title/position]: General Counsel		
Corporate Policy Owner: [title/position]: Director Global Compliance & Privacy		
Overview of changes	Version	Effective Date
New policy	1.0	12 December 2023

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