

**HUMAN RIGHTS POLICY****1- Introduction**

Almirall is committed to respecting the dignity and rights of all people and seeks to favour and preserve the wellbeing of the social environments in which it operates.

This policy formalizes the company's commitment to the human rights recognized in both national and international legislation. This policy is based on the principles of the United Nations Global Compact, the Universal Declaration of Human Rights, the OECD guide for multinational enterprises and the fundamental regulations and conventions of the International Labour Organization. In addition, as a signatory to the United Nations Global Compact, Almirall is committed to its 10 principles.

Almirall will ensure that its employees are aware and understand this policy and have the necessary elements for its compliance.

**2- Object and scope**

This policy is designed with the aim of confirming the commitment that Almirall assumes, at a global level, in relation to the respect and promotion of the human rights of the communities in which is present, in its operations and supply chain; as well as establishing the general principles necessary to ensure this commitment.

This policy applies to all of Almirall's employees and to those who perform actions on behalf of Almirall, in any territory.

**3- Commitments and general principles**

Almirall endeavours not to participate in or be complicit in actions that compromise or jeopardize the universal human rights recognized in national and international legislation.

Almirall's commitment to the respect and promotion of Human Rights has been developed around areas that cover the company's scope of action, particularly in the relationship with employees, suppliers and other partners, patients and society in general and is materialised in the following commitments:

**3.1. Commitments towards employees**

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

- a. Not accepting any type of discriminatory behaviour based on race, age, gender, marital status, sexual orientation, political opinions, religion or any other personal, physical or social condition of its employees and to having the necessary procedures to report it, treat it and act in cases where it is necessary.
- b. Rejecting forced labour in all its forms and any manifestation of physical, sexual, psychological or moral harassment, abuse of authority or any other conduct that creates an intimidating or offensive environment for the rights of individuals, and to having the necessary procedures to report it, treat it and act in cases where necessary.

- c. Rejecting child labour in any of the company's activities in any territory. The provisions of the International Labour Organization regarding the minimum age established for work as well as the regulations of each country will be respected in all of the company's hiring processes.
- d. Recognising the right of employees to enjoy a dignified, safe and healthy work environment. Almirall promotes the dissemination and reinforcement of a culture of safety, developing awareness of risk, and encouraging responsible behaviour on the part of its employees.
- e. Promoting diversity and inclusion, as well as the wellbeing of employees.
- f. Guaranteeing the right to freedom of affiliation, association and the effective recognition of the right to collective bargaining.
- g. Defending freedom of opinion, information and expression, respecting the diversity of opinions in the company and promoting dialogue and communication.
- h. Offering decent working conditions, with adequate remuneration and hours, and fair and equal treatment by avoiding that people are treated differently or less favourably due to characteristics that are not related to their merit or the requirements inherent in the work.
- i. Investigating those behaviours that have an impact on human rights and that are revealed by Almirall employees or collaborators through the whistleblowing channel or other mechanisms.

### **3.2. The commitment of our suppliers and other business partners**

Almirall has a wide and diverse range of suppliers, including raw material suppliers and manufacturers, service providers, contract research organisations (CROs) and other business partners. All members of Almirall's supply chain are expected to operate their businesses responsibly, transparently, sustainably and ethically, respecting human rights. Through appropriate contractual agreements and procurement processes, Almirall ensures that consultants, agents, contractors and suppliers are aware of and duly comply with the principles set out in the Almirall Supplier Code of Conduct, which sets out the company's human rights commitments, including those of their respective employees at all stages of the supply chain.

Suppliers and other business partners are required to commit to respecting and defending the human rights of their direct and indirect employees, to treat them with dignity and respect and to comply with all the commitments assumed in the Almirall Supplier Code of Conduct that reflects Almirall's human rights standards. These include the prohibition of child labour, non-abuse and non-harassment of psychological, sexual or verbal harassment, prohibition of corporal punishment, adequate conditions of employment and freedom of association and collective bargaining, among others.

Almirall has a sustainable procurement programme that includes human rights auditing of its suppliers to continuously improve the working conditions of those working in their supply chains. The company monitors the results of such audits and implements action plans to assist its suppliers in complying with applicable laws and processes.

### **3.3. Commitment to our patients and healthcare professionals**

As a biopharmaceutical company, Almirall is firmly committed to the healthcare community, in particular to its patients, who are at the centre of the company's business. Therefore, Almirall commits to:

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

### **3.4. Commitment to society and our communities**

A company must act with full awareness of the environment and the social needs existing in the different countries and cultures in which it operates. For this reason, Almirall commits to respecting and promoting the economic, social and cultural rights of the members of the communities in which it operates, complying with current national and international legislation.

### **4- Compliance and monitoring**

To identify, prevent, mitigate and respond to potential negative consequences on human rights, and given that human rights risks may change over time, Almirall carries out a continuous due diligence process in its direct and indirect activities with the aim of not violating and respecting the rights of the agents involved.

The prevention and anticipation of any risk associated with human rights will be carried out by the directors and managers of each of the respective functional areas, following the processes established in this Policy and applicable to all personnel, positions, departments, committees and organisational units of Almirall.

Barcelona, 9 November 2022