GLOBAL CORPORATE POLICY

ARTIFICIAL INTELLIGENCE POLICY

Effective date	January 27, 2026

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1. Purpose

This Policy (the "**Policy**") sets out the rules and principles to follow in relation to the development and deployment of Artificial Intelligence (as defined below) at Almirall, with the aim of ensuring compliance with the applicable laws and under the principle of Responsible AI (as defined below).

2. Scope

This Corporate Policy applies to Almirall S.A. and the legal entities in Almirall group (altogether "**Almirall**" or the "**Company**"), and their respective employees. In the event an external third party is engaged by Almirall in relation to the activities or purposes described in the Policy, they should abide by this Policy to the extent applicable.

3. Policy elements

a) Definitions

- Artificial Intelligence (AI): a machine-based system that is designed to operate with varying levels of autonomy and that may exhibit adaptiveness after deployment, and that, for explicit or implicit objectives, infers, from the input it receives, how to generate outputs such as predictions, content, recommendations, or decisions that can influence physical or virtual environments.

- Bias: an inclination or prejudice for or against one person or group, especially in a way to be considered unfair.

- Deployer: means an individual or legal entity, public authority, agency or other body using an AI system under its authority except where the AI system is used in the course of a personal non-professional activity.

- Intended Purpose: means the use for which an AI is intended by the Provider, including the specific context and conditions of use, as specified in the information supplied by the Provider in its Instructions for use, promotional or sales materials and statements, as well as in the technical documentation.

- Provider: means an individual or legal entity, public authority, agency or other body that develops an AI or places an AI on the market or puts the AI into service under its own name or trademark, whether for payment or free of charge.

- Responsible AI: refers to the practice of designing, developing, and deploying AI in a way that is ethical, transparent, accountable, and aligned with human values and societal norms.

b) Principles

Almirall is committed to ethical development, deployment and use of Artificial Intelligence systems. Consequently, AI initiatives at Almirall, whether acting as Provider or Deployer, shall be subject to the following principles (Principles):

- Human Empowerment & Oversight: Individuals impacted by AI must have control over how their personal information is used. AI must not possess complete autonomy in decision-making, and its output must be screened with a human-on-the-loop and/or in-command perspective. The freedom of choice of end-users must be consistently considered and respected.

- Fairness and Bias minimization: The reduction of Bias and the enhancement of fairness –understood as an impartial and just treatment or behavior without favoritism or discrimination- must be pursued through continuous monitoring and understanding, allowing adaptation and correction of Bias throughout the lifecycle of AI.

- Privacy, security and protection by design: Compliance with applicable regulations concerning personal data protection must be ensured, adopting technical constraints and guardrails on the reuse of personal data only for purposes that are lawful and compatible with the original purpose of processing. Security measures aimed at safeguarding personal data and sensitive information must be implemented throughout the AI lifecycle.

- Data governance: A data management discipline must ensure safe, high-quality data that is easily accessible, including the control of the origin of input data.

- Trustworthiness: This includes the principles of transparency, explainability, and ethical use. The circumstances and methods of AI usage, its objectives, the assumptions driving the AI system, and its limitations must be transparent, understandable and coherent for human beings. The use of AI in accordance with its Intended Purpose and following internal processes and methodologies shall be observed as a measure to enable ethical use.

- Accountability & Reliability: AI solutions must deliver accurate and reliable outputs, performing as intended under defined conditions throughout their expected lifecycle, with evidence-based documentation showing compliance with applicable regulations.

Additionally, Almirall considers sustainability aspects at a supplier level, which shall apply also to key partners providing AI-related services.

c) AI Prohibited practices and Responsible AI

It is expressly forbidden the use, implementation, put into service or development of AI systems that:

- use subliminal, manipulative, or deceptive techniques to distort behaviour and impair decision-making, causing significant harm.
- exploit vulnerabilities due to age, disability, or socio-economic situations, leading to significant harm.
- evaluate or classify people based on their social behaviour or personal traits, resulting in unjustified or disproportionate treatment.
- assess or predict the risk of a person committing a crime based solely on profiling or personality traits.

- categorize people based on their biometric data in ways that lead to unjustified or disproportionate treatment.
- infer emotions in the workplace or other sensitive contexts.
- scrape facial images from the internet or CCTV footage without consent.
- are used for law enforcement purposes.

In addition to the above, and in the context of Responsible AI, any AI system developed, deployed or used at Almirall must not generate content that could cause harm to people or society. This includes, without limitation, the use of AI to generate content related to exploitation or abuse; content that induces, or may induce, suicide or self-harm; violent or otherwise harmful content; and content that may facilitate fraud, misinformation, or deceptive activities.

d) Pillars of the Almirall AI Program

In observance of the Principles defined above, the Almirall AI Program shall be founded on different pillars enabling governance processes to ensure that any AI system developed, deployed or used at Almirall is governed throughout its lifecycle. Those pillars are:

i. AI Strategy and Leadership: Almirall's AI strategy shall be defined and maintained in alignment with corporate goals and the Principles, serving as the foundation for all AI-related activities.

ii. AI Risk Management: All AI systems at Almirall must undergo comprehensive risk assessments and comply with applicable laws and internal policies throughout their lifecycle to identify, assess, and mitigate risks related to the development, deployment, and use of AI. This includes operational and legal risks, as well as, where necessary, assessments of potential impacts on fundamental rights and third-party risk considerations.

iii. Technical Landscape, Guardrails and AI Observability: Almirall shall put in place the necessary technical infrastructure and implement technical guardrails and observability mechanisms to ensure that AI systems operate within defined boundaries and can be observable, auditable and aligned with governance requirements throughout their lifecycle.

iv. AI Inventory and Lifecycle Management: Almirall shall maintain a comprehensive and dynamic AI inventory that documents AI-related systems, including but not limited to their respective purpose, ownership, risk classification, and lifecycle status.

v. AI Monitoring and Audit: Almirall shall regularly monitor and audit AI systems to ensure compliance with this Policy and other applicable internal and external regulations, considering the risk categorization made in risk assessments. Performance, reliability, security or safety expectations and metrics must be continuously assured and evaluated, ensuring alignment with Policies and to avoid unexpected behaviour.

vi. AI Literacy and AI Workplace Mindset: Almirall shall promote a culture of Responsible AI and AI literacy across the organization, equipping employees with the knowledge and skills needed to interact with AI systems appropriately and effectively.

e) Roles and responsibilities

The following roles shall carry out the tasks defined below to streamline resources and sound management of AI systems at Almirall:

- The **AI Strategy and Transformation Lead** shall define and drive Almirall's enterprise-wide AI transformation, ensuring strategic alignment, governance, and effective execution across all business units and corporate functions. This role leads the prioritization of AI initiatives, oversees enterprise governance through the rAIse Committee, defines AI-related policies and operating models, and maintains visibility of the global AI portfolio for executive decision-making. The AI Transformation Lead enables delivery by supporting product owners, removing cross-functional blockers, promoting best practices, and reuse of standards. Furthermore, the role serves as a strategic advocate for AI literacy, Responsible AI practices, and enterprise-wide adoption, acting as a key agent of change to promote a culture of innovation, ethical implementation, and continuous learning throughout the organization.

- The **rAIse Committee** shall be the AI operative cross-governance body. The rAIse Committee shall oversee Almirall's Responsible AI governance by monitoring regulatory developments, providing frameworks and guidance over AI-related risks. It defines data and model governance standards for AI, implements compliance controls, and establishes guardrails to ensure traceability and auditability. The Committee also sets technical strategy, manages AI demand and delivery processes, reviews the financial performance and return of investment of AI initiatives, and promotes AI literacy and cultural change across Almirall.

- **AI Product Owners** shall be responsible for maximizing the value of AI systems driven products and ensuring alignment with Almirall's goals, delivering measurable value. To this end, AI product owners shall engage with all relevant stakeholders, leading the necessary change management. They shall be accountable for implementing the necessary measures and safeguards to ensure Responsible AI, adopting the controls and measures during the lifecycle of AI projects that may be instructed as a result of the risk assessments, showing evidence, alone or jointly with other involved stakeholders, of the implementation of controls and compliance with this Policy.

- **rAIse Ambassadors** shall be the key liaison between their Business Units and the rAIse Committee. They are responsible for translating Almirall's AI strategy into actionable plans within their domain, ensuring alignment, adoption, and execution of AI policies and initiatives.

4. Governance

Corporate Policy Sponsor: CEO		
Corporate Policy Owner: AI Strategy and Transformation Lead		
Overview of changes	Version	Effective Date
New Policy	1.0	27th January 2026

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