GLOBAL CORPORATE POLICY

Anti-Bribery & Anti-Corruption Policy

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1. Purpose

This Corporate Policy (the "**Policy**") sets out the framework for Anti-Bribery & Anti-Corruption ("**ABAC**") practices at Almirall (as defined below).

Almirall is committed to conducting business in an ethical manner and to the highest standards of integrity with zero tolerance for bribery and corruption. Almirall is further committed to implementing and enforcing systems to ensure the prevention of bribery and corruption.

This Policy establishes the common principles to which Almirall works to in ensuring that ABAC requirements are met across all business activities, including working with third parties. Almirall seeks to mitigate all forms of bribery and corruption risks, actual as well as perceived.

2. Scope

This Policy applies to all Almirall, S.A. and the legal entities in its group (altogether, "**Almirall**"), its employees, officers, consultants, trainees, or agents, suppliers, contractors, business partners, and all other third parties with whom Almirall shares a working relationship.

3. Policy elements

Definition of bribery and corruption
Bribery and corruption are defined as actively or passively offering, giving, promising to give, receiving or accepting something of value or for an advantage, so as to induce or influence an action or decision in order to gain a commercial, contractual, regulatory or personal advantage.

Zero tolerance risk attitude
Almirall has zero tolerance for activities that are not conducted to the letter and spirit of the ABAC legislation. Almirall shall seek to act professionally, fairly, in good faith, and with high integrity in all business activities across our global presence, including in our activities related to the selection of and working with third parties.

Bribery, corruption, and other similar types of conduct are prohibited, whether between individuals or with civil servants or public and private organizations, both national and international. At Almirall all types of illegal and criminal bribery and corruption related practices are prohibited without exception or limits, including facilitation payments.

The Company does not permit political contributions or donations on its behalf unless expressly authorized, compliant with applicable laws, fully transparent, and never intended to improperly influence any decision or gain a business advantage.
Almirall does not tolerate any attitude, behaviour or practice of corruption, bribery, or influence in relation to civil servants or public institutions, both national and international. Almirall does not tolerate deceitful, fraudulent, or malicious conducts that could drive Almirall to obtain undue or unfair advantages.

All Almirall employees, and particularly those with specific oversight or supervisory functions, are considered responsible for the prevention, detection, and reporting of bribery and other forms of corruption and should use the control mechanisms available at Almirall to prevent,

detect, and report any practices where there may be an actual or perceived risk of bribery and corruption.

Almirall publicly expresses its rejection of any kind of illegal, criminal, unethical, and unfair actions and expressly confirms that such practices are prohibited within the organization and across our business activities.

We shall not conduct transactions that involve a benefit, property or proceeds resulting from crime including bribery, fraud and tax avoidance.

Promotional Compliance

Almirall is a member of the EFPIA (European Federation of Pharmaceutical Industries and Associations). As such, we are obligated and committed to complying with the requirements established in the EFPIA's Code on the promotion of prescription-only medicines to, and interactions with, healthcare professionals. Almirall is also committed to complying with all ethical codes issued by associations in the pharmaceutical industry in countries in which Almirall has a direct presence.

The promotion and commercialization of Almirall products must be based on their intrinsic added value, innovative nature, and the rigorous dissemination of scientific information available on safety, quality, and the efficacy of the products.

Almirall prohibits and rejects any practice or conduct that involves incitement to prescribe our medicines in breach of regulations. Such practices can also be considered bribery and corruption in certain jurisdiction and are prohibited. Hospitality legally allowed under the applicable code of conduct on promotional compliance is excluded from the prohibited interactions.

Financial Contributions

Financial or other contributions made by Almirall to projects led by hospitals, universities, scientific companies, or patient organizations must be based on the principles of legality, transparency, and value contribution. Almirall employees who manage this type of interaction will ensure that the objectives are clear, and Almirall's contribution is reasonable, proportionate and in compliance with all applicable legal requirements, including those regarding accounting and tax regulations.

Charitable contributions and sponsorships must be made transparently, for legitimate philanthropic or scientific purposes only, and must never be used—or perceived as being used—to improperly influence healthcare professionals, decision-makers, or prescribing practices.

Responsibilities of Employees. Non retaliation.

All Almirall employees are required to use established channels to report any known situation or any suspicion that bribery or corruption has occurred or may occur in the future which could lead to, or imply, a breach of this Policy. Employees may make such reports to their direct manager, People & Culture, Compliance or Legal representative or via Speak Up channel (see link below).

All Almirall employees are protected from retaliation for making a report of actual or potential bribery or corruption in good faith, and in the event that any employee refuses to partake in any activity that is not in accordance with this Policy.

The company has established clear procedures for the timely reporting, thorough investigation, and appropriate resolution of suspected or confirmed breaches, including internal disciplinary actions, ensuring accountability and remediation.

The Policy Sponsor and Policy Owner are responsible for monitoring the effectiveness of this Policy through the corresponding internal departments in Almirall and will review its implementation on a regular basis.

Training

Almirall is committed to providing regular, risk-based anti-bribery and anti-corruption training to all relevant personnel to ensure ongoing awareness, understanding, and adherence to applicable laws, regulations, and Almirall's standards.

4. Governance

Corporate Policy Sponsor: Chief Legal Officer & General Counsel
Corporate Policy Owner: Executive Director, Global Compliance

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.