GLOBAL CORPORATE POLICY

Corporate Sustainability Policy

Effective date	23 July 2026
Approved use	Approved for external dissemination

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1. Purpose

The purpose of this Policy is to establish the general framework of activities for the management of the sustainability practices undertaken by Almirall deriving from the 2030 Sustainability Strategy approved by the Almirall's Board of Directors and overseen by the Audit & Sustainability Commission.

2. Scope

This policy applies to Almirall, S.A. and the legal entities in its group (altogether, "**Almirall**") and their respective employees involved in the relevant activity or facility.

3. Policy elements

3.1. Definition of Sustainable Development and Sustainability

Sustainable development is defined as "meeting the needs of the present without compromising the ability of future generations to meet their own needs". In the corporate context, sustainability means that companies need to not only focus on financial performance but also need to take into account the risks and opportunities associated with the social and environmental impacts they may have in their own operations and along the full value chain.

3.2. Stakeholder Relationships and Engagement Principles

Almirall recognises that long-term value creation depends on understanding and considering the legitimate interests and expectations of its stakeholders. Consistent with the principles set out in the **Code of Ethics** and other applicable corporate policies, the Company seeks to maintain responsible, transparent and mutually beneficial relationships with its stakeholders and to integrate sustainability considerations into its decision-making processes, business activities and long-term strategy.

Through regular dialogue and engagement, Almirall seeks to identify sustainability-related impacts, risks and opportunities, understand stakeholder expectations and contribute to sustainable development whilst creating long-term value for the Company, society and the environment. Environmental protection, responsible resource management and positive social impact are recognised as essential elements of sustainable business performance and stakeholder trust.

In particular:

- **Employees:** Almirall shall promote a safe, healthy, inclusive and engaging workplace that attracts, develops and retains talent, fosters equal opportunities, supports employee wellbeing and enables individuals to reach their full potential.

- **Patients, patient organisations, healthcare professionals and the scientific community:** Almirall seeks to better understand stakeholders' needs and expectations to support improved patient outcomes, advance scientific knowledge and reinforce its patient-centric approach.

- **Suppliers and value chain partners:** Almirall shall promote responsible business practices throughout its value chain, encourage respect for internationally recognised human and labour rights, and advance sustainability standards among its value chain.

- **Shareholders, investors, financial institutions and auditors:** Almirall shall provide transparent and reliable information on its sustainability strategy, objectives, risks, opportunities and performance to support informed decision-making and long-term value creation.

- **Non-governmental organisations, foundations and social entities:** Almirall shall collaborate with organisations aligned with its sustainability priorities to promote positive environmental and social outcomes and encourage employee participation in community engagement and volunteering initiatives.

- **Communities, society and the environment:** Almirall shall contribute positively to the communities in which it operates by reducing its environmental footprint, supporting climate action, promoting the efficient use of natural resources, protecting biodiversity and contributing to sustainable development.

Through these relationships, Almirall aims to strengthen its understanding of stakeholder expectations and enhance its ability to manage sustainability-related impacts, risks and opportunities while creating value for both the Company and society as a whole.

3.3. Sustainability at Almirall

Sustainability is more than just a commitment; it's a fundamental pillar of Almirall's strategy to create long-term value and a foundational factor on how the company plans to achieve its Purpose of transforming their patients' worlds by helping them realise their hopes and dreams. Sustainability shall be integral to the company's vision, values, strategy and operations. It shall be embedded in its business strategies and its way of doing business, covering Almirall's entire value chain including sourcing, own operations, and products and services sold.

Almirall's actions for impact shall be developed and executed under four strategic pillars - Planet, People, Patients and Partners – and a fifth overarching pillar Principles, which shall govern behaviours across the company.

3.4. Overview of main Sustainability pillars

All sustainability-related material impacts, risks and opportunities identified[1] and included in the sustainability strategy of the company will follow under these five pillars:

Through **Planet**, Almirall shall take actions on climate through its science-led, delivering energy decarbonization and energy efficiency, sustainable mobility and net zero supplier engagement plans. Almirall shall also act on other key environmental vectors by promoting actions towards pollution prevention, water stewardship, circular economy and sustainable use of resources, and nature & biodiversity protection.

Through **People**, the company shall focus on implementing a strong global diversity, equity and inclusion plan, enhancing its talent management to unleash employees' full potential, fully implement its corporate holistic Wellbeing Programme, as well as ensure the maximum level of health and safety in the workplace, and deploy a corporate volunteering programme.

[1] An Impact, Risk and Opportunity Assessment is carried out periodically to identify, assess and prioritise material sustainability-related impacts, risks and opportunities (Double Materiality Assessment) relevant to the Company and its stakeholders.

The **Patients** pillar shall allow Almirall to strengthen its commitment to patients through its patient organizations' engagement plan with a special focus on the wellbeing of people with skin diseases. Almirall shall embed a patient centric mindset across the company.

Through **Partners**, Almirall shall deploy its sustainable procurement programme, pursuing the respect for internationally recognised human and labour rights and reinforcing sustainability-related aspects across its value chain.

All of this shall be done whilst ensuring an ethical and transparent culture, applying a strong governance, and acting with good behaviour **Principles**. Almirall shall provide up-to-date information required by the applicable laws for corporate matters and other information considered relevant for investors and auditors and use a variety of communication channels that enable shareholders and the investor community to access it in an easy and appropriate way.

3.5. Sustainability Targets, Measurement and Link to Compensation

Almirall shall set measurable sustainability targets that are in line with the United Nations' (UN) Sustainable Development Goals for 2030 (SDGs) and the Climate Goals of the Paris Agreement.

The targets shall be measured via Key Performance Indicators (KPIs) and described as appropriate in the consolidated statement of non-financial Information and sustainability information, annual report and on the company´s website. The Board of Directors of Almirall shall be responsible for the approval of such KPIs.

Sustainability targets shall be linked to the variable remuneration of key internal stakeholders including key members of the Management Board, Senior Leadership, individuals with sustainability direct responsibilities, both for the short and the long term.

3.6. Sustainability Management: Roles and responsibilities

- **Board of Directors:** The Board of Directors retains ultimate responsibility for the approval and oversight of the Company's sustainability strategy, policies, objectives, targets and sustainability-related risks and opportunities.

- **Audit and Sustainability Commission:** Review the implementation of the Company's Sustainability Strategy and monitor progress against sustainability commitments, objectives and targets. Supervise material sustainability-related impacts, risks and opportunities and their integration into the Company's risk management framework.

- **Management Board:** The Management Board, including the CEO, shall be responsible for the supervision and coordination of all activities related to sustainability and, specifically, for approving the plans, the necessary management and control measures, and for overseeing the different programs and initiatives.

- **Corporate Sustainability Committee:** The Corporate Sustainability Committee shall report to the company's Management Board and has the mission and responsibilities described in the company´s Corporate Governance Policy. The Chairman of the Corporate Sustainability Committee shall be the Chief People & Culture Officer, the Secretary being the Global Sustainability Executive Director.

- **Global Sustainability Executive Director:** The Global Sustainability Executive Director, reporting to the Chief People & Culture Officer, shall be responsible for the management

and supervision of all sustainability-related aspects in coordination with the departments involved.

- **Area Directors and affiliates' General Managers.** As a general rule, it is the responsibility of the Directors of each department or area of activity of the company (the General Managers or Country Managers in the case of subsidiaries) to ensure the integration and application of the principles contained in this Policy in their respective fields of competence.

3.7. Relationship with other Corporate Policies

This policy is aligned with and is complemented by some other Corporate Policies such covering human rights, risk control, People & Culture, health, safety and environment, Global Procurement, anti-bribery and anti-corruption, among others. This Policy takes into account recommendations 53, 54 and 55 included in the Code of Good Governance of Listed Companies approved in June 2020.

4. Governance

Corporate Policy Sponsor: Chief People & Culture Officer
Corporate Policy Owner: Executive Director, Global Sustainability

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 the employee's direct manager, to People & Culture, the local Compliance or Legal representative or through the SpeakUp! channel.