

Almirall Suppliers' Code of Conduct

1.- Introduction

At Almirall, we believe that in order to achieve our strategic objectives and fulfil our mission and noble purpose, we must do “what is right”, always act with integrity and responsibility, respect our stakeholders and of course, comply with current regulations.

Our noble purpose is to transform the patients’ world by helping them realize their hopes & dreams for a healthy life. This purpose is our footprint, our legacy for future generations and our contribution to society.

In Almirall we work based on our corporate values of being a Caring, Dedicated, Dynamic and Expert company. Embedded in the fabric of the Almirall culture, these values help us earn the trust that patients, healthcare professionals and other stakeholders place in us.

Respect for the law, commitments undertaken, the quality of service and contractual good faith form the basis of relations between Almirall and its suppliers. We seek quality, rigor, commitment and excellence in a supplier, as a source of support for our activity. Relationships with our key suppliers are considered one of Almirall’s assets. We base our supplier relations on the principle of contractual good faith, and we demand reciprocity and transparency from the supplier in the provision of services and information on its technical and financial solvency.

Almirall expects its suppliers to agree on the standards defined in this Almirall Suppliers’ Code of Conduct as it is an important element in a supplier’s assessment and selection.

2.- Ethics

2.1.- Anti-bribery . Anticorruption

Almirall does not tolerate the attitude, behavior or practice of corruption, bribery or influence peddling in relation to civil servants or public institutions, both national and international, or otherwise in any circumstances.

Suppliers are expected to have the same zero-tolerance approach to these behaviors and in particular, Almirall suppliers may not, directly or indirectly, give, offer or promise bribes or other unlawful incentives to any of their stakeholders.

Suppliers are also expected not to offer to Almirall employees gifts, even if they are complimentary gifts.

2.2.- Privacy

Almirall processes the personal data of its stakeholders with the utmost respect to their privacy, and in compliance with the applicable laws on personal data protection. In particular, Almirall processes personal data for specified, explicit and legitimate purposes only. Whenever suppliers are rendering services to Almirall that involve processing activities on personal data, Almirall expects them to comply with the applicable laws as well, and to apply the necessary organizational and technical safeguards to be contractually agreed with Almirall in a data processing written agreement.

In particular, when personal data of patients are processed, suppliers must ensure that the appropriate informed consent is in place and that they will handle personal data consistently with such consent.

Almirall also expects suppliers to provide appropriate training to their staff on their responsibilities in accordance with the applicable personal data protection laws.

2.3.- Animal welfare

In designing our pre-clinical trials and in our relationships with Contract Research Organizations, to whom we outsource these trials, Almirall demands meticulous respect of current legislation in the field of research involving animals. The welfare of the laboratory animals is a top priority for Almirall. We have a moral responsibility with the animals we use for research and we are highly committed to their responsible use.

In this connection, whenever services involve animal testing, suppliers are expected to treat animals humanely and with consideration of the 3Rs principles:

- “Replacement”: which refers to technologies or approaches which directly replace or avoid the use of animals in experiments where they would otherwise have been used (for instance, *in vitro* or *in silico*).
- “Reduction”: which refers to methods which minimize the number of animals used per experiment.
- “Refinement”: which refers to methods which minimize animal pain and distress, and enhance animal welfare.

2.4.- Intellectual Property. Confidentiality. Insider Trading

Almirall's intellectual property (including patents and trademarks), know-how and confidential information is the result of the collective efforts of all Almirall employees. It belongs to Almirall, and constitutes one of its most valuable intangible assets. Suppliers therefore, will ensure its protection and appropriate use, whenever such use is necessary for the purposes to render a particular service and always in accordance with applicable legal regulations and Almirall's instructions.

Almirall's confidential information must always be protected and suppliers must sign confidentiality undertakings to ensure that the appropriate safeguarding measures are adopted. Suppliers are also expected to communicate any confidential information to their own employees on a need-to-know basis only.

Almirall is a company listed in the Spanish stock-exchange market and in some cases, such confidential information might be considered privileged information under applicable regulations. In this connection, suppliers must have in place the appropriate policies and mechanisms that prohibit their employees from insider trading for their own or the personal profit of others, using Almirall's confidential information.

2.5.- Trade controls

Almirall does not engage suppliers which are established in a target country of any sanctions program implemented by national (e.g. the United States of America) or supranational authorities (e.g. the European Union, the United Nations).

Suppliers cannot have any link or dealing, directly or indirectly, with any Specially Designated Nationals and Blocked Persons (SDN) or countries listed under OFAC, or other designated persons who are a target of a sanctions program according to the most current lists issued by the abovementioned national or supranational authorities.

2.6.- Business Integrity. Fair Competition. Product Communication

Almirall competes on the basis of fair play and respect for market laws. It does not tolerate deceitful, fraudulent or malicious conduct that could drive the company to obtain inappropriate advantages. The promotion and commercialization of our products is 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.

Suppliers must conduct their business in line with fair competition and in accordance with all applicable anti-trust laws. When the supplier services imply the promotion of our products, the supplier will do so only when authorized and always in an ethical, fair and truthful way, under the instruction received and using the materials and/or information provided by Almirall.

2.7.- Product security (counterfeits)

Suppliers will not be involved in any activity related to counterfeit medicines or illegally traded medicines and will take the necessary steps to ensure the authenticity of medicines through the end-to-end supply chain, in case they provide services integrated in the Almirall's supply chain.

Suppliers shall inform Almirall in a timely manner about any incident related to counterfeit medicine involving an Almirall product that they become aware of, and agree to provide reasonable assistance -if so requested- in any investigation initiated by Almirall.

3.- Labour

Almirall believes that employees are key and valuable assets of a company. In this connection, suppliers must be aligned with this principle by respecting the human rights of their own employees and treating them with integrity, dignity and respect.

3.1.- Child labour

Child labour is prohibited by the ILO Convention 138 on the Minimum Age.

Suppliers of Almirall may not use child labour. The minimum age for employment set forth by the ILO Convention 138 is 15 years of age (or 14 in accordance with developing country exceptions in accordance with the ILO Convention no.138). If the national law of the supplier stipulates a higher age for work or mandatory schooling, the higher age will apply.

Furthermore, the work carried out by employees under 18 years old must always respect the minimum employment conditions in force in each country's regulations and in no case, can be contrary to the minimum conditions established by the ILO. In this sense, children under 18 are forbidden from doing hazardous work (dangerous, unhealthy or bad for their morals).

3.2.- Non abuse & non-harassment

Supplier is expected to provide a workplace free of any type of:

- Discrimination based on age, gender, race, religion or belief, origin, sexual orientation, political affiliation, union membership, physical ability or marital status, in line with ILO Convention No. 111 on Discrimination. In this regard and if mandatory under supplier's national law, suppliers will promote equality within their organization through the preparation and implementation of plans and programs, that observe the minimum standards set forth in the relevant labour regulations.
- Psychological, physical, sexual or verbal threat, intimidation, harassment or abuse.

3.3.- Working hours, wages and benefits

Suppliers must pay employees according to applicable wage laws, including minimum wages, overtime hours and mandated benefits. In this regard, wage payment will take place in a timely manner according to labour regulations applicable to the supplier.

Suppliers must have working hours that are in compliance with national laws and must communicate with employee, the basis on which they are being compensated in a timely manner and/or whether overtime is required and subsequently, the wages to be paid for such overtime. In no case shall working hours and overtime exceed the maximum thresholds set forth in the applicable labour regulations.

3.4.- Minimum employment conditions. Forced labour

Supplier must respect the minimum hiring and employment conditions established by the regulations in force. Suppliers shall not use forced, bonded or indentured labour or involuntary prison labour.

3.5.- Identification of concerns

Suppliers' employees should be encouraged to report concerns or illegal activities in the workplace without threat of reprisal, intimidation or harassment. To this effect and if mandatory under their national law, suppliers will enable reporting channels for their employees. Suppliers will investigate such reported situations and take corrective actions if needed.

3.6.- Freedom of association and collective bargaining

Suppliers shall respect the rights of employees, as set forth in local laws, to associate freely, bargain collectively, join or not join labour unions, seek representation and join employees' councils, as the case may be.

3.7.- Social Security

If required by their national law, suppliers shall comply with the social security regulations including timely payment of the relevant contributions.

4.- Occupational Health and Safety

Suppliers shall provide a safe and healthy working environment for their employees.

4.1.- Minimum standards. Employees protection

As a minimum, suppliers will provide their employees with adequate lighting and temperature, potable drinking water, ventilation, sanitation, personal protective equipment, as well as with equipped and safe workstations.

Suppliers shall protect employees from unhealthy exposure to chemical, biological, psychological and physical hazards in the workplace.

In accordance with occupational health and safety regulations, suppliers shall evaluate the risks of the work positions and will provide their employees with the necessary information and training to minimize the occupational risks accordingly.

4.2.- Process Safety

Suppliers shall operate and maintain all its facilities in the safest manner possible. Suppliers shall have programs in place through safety controls processes, to prevent significant release of chemicals.

4.3.- Emergency Preparedness and Response

Suppliers shall identify and assess emergency situations in the workplace in order to minimize their impact by implementing emergency plans and response procedures.

4.4.- Hazard Information

Safety information relating to hazardous materials (including pharmaceutical compounds and pharmaceutical intermediate materials) shall be available to educate, train and protect suppliers'

employees from hazards and will be shared with Almirall as per its request.

5.- Environment

At Almirall we understand environmental respect as an obligation to society, to ourselves, to the world's sustainability and for future generations. We expect our suppliers to have the same respect for the environment.

5.1.- Environmental authorizations

Suppliers must comply at all times with the current environmental legislation. All required environmental permits, licenses, information registrations and restrictions shall be obtained and their operational and reporting requirements followed.

5.2.- Pollution prevention. Resources management

Suppliers will respect the environment by using resources rationally and will implement control mechanisms in order to minimize the pollution caused by suppliers' activities.

5.3.- Waste and emissions

Suppliers will minimize the generation of waste through avoidance, reuse and/or recycling procedures.

Suppliers will measure, test, control and treat emissions and industrial wastewater before they are released into the natural environment. The hazardous substance emissions into the atmosphere must be also measured, tested and treated before they are released.

5.4.- Spills and releases

Suppliers must have systems in place to prevent or mitigate accidental spills and releases into the environment.

5.5.- Climate change

Suppliers will progressively measure their greenhouse gases emissions and will pledge to voluntarily reduce them.

6.- Quality

Almirall's suppliers are expected to meet agreed upon product specifications and quality requirements in order to provide goods and services that consistently meet applicable international quality regulations and Almirall's needs, perform as intended and are safe for their

intended use. These product specifications and quality requirements shall be defined in a supply agreement and a quality agreement between Almirall and the supplier.

Almirall requests to its suppliers the commitment of fulfilling the quality standards applicable to each category of supplied product, as it is defined by the health authorities. At the same time, with the aim of overseeing and strengthening this degree of fulfilment, Almirall defines and performs periodical audit plans to its suppliers.

7.- Management Systems

Suppliers are expected to manage their activities systematically in order to maintain business continuity, meet the standards set forth in this Almirall Suppliers' Code of Conduct and to improve their operations continually. Such measures may include, without limitation, the following:

- Compliance with the law and with the contract in place.
- Informing subcontractors involved in the services provided to Almirall about the contents of this Almirall Suppliers' Code of Conduct and requiring compliance therewith.
- Allocating appropriate resources as needed and engaging in employee training.
- Maintaining the necessary documentation to track and prove compliance with these standards.
- Continually improving by setting performance objectives, executing implementation plans and taking necessary corrective actions for risks or deficiencies detected.
- Reporting promptly to Almirall any non-compliance, breach or violation of this Almirall Suppliers' Code of Conduct.

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GLOSSARY

Bribery	Act of dishonestly giving or receiving something of value (for instance, money or a gift) in exchange for some kind of favour, influence or action in return.
Counterfeit medicine	Counterfeit medicine is an illegal medicine that may be contaminated or contain the wrong or no active ingredient. Medicine could have the right active ingredient but at the wrong dose. Counterfeit medicine may be harmful to health.
Insider trading	Illegal practice of trading on the stock exchange to one's own advantage through having access to confidential information of a listed company.
Personal Data	Information relating to natural persons: (i) who can be identified or who are identifiable, directly from the information in question; or (ii) who can be indirectly identified from that information in combination with other factors specific to such individual; in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of such natural person.