

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

1- Introduction

Almirall, and especially its Board of Directors, are fully committed to conducting business in an ethical and honest manner, implementing and enforcing systems to ensure the prevention of bribery and corruption.

This Policy responds to the need to confirm the aforementioned commitment and establishes the common principles to which the Company has voluntarily adhered regarding Anti-Bribery and Anti-Corruption rules, as well as the corresponding standard common practices.

2- Principles

Almirall has zero tolerance for bribery and corrupt activities and will act professionally, fairly, in good faith, and with total integrity in all business and relationships in any country and jurisdiction.

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

Almirall is a member of the EFPIA (European Federation of Pharmaceutical Industries and Associations). As such, it is 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," as well as complying with all ethical codes issued by associations in the pharmaceutical industry in countries in which Almirall has a direct presence through its affiliates.

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.

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, tax and regulations.

This Policy applies to all employees (including those of any Almirall affiliate), officers, consultants, contractors, trainees, or agents, including any third party as customer or provider of Almirall or any of its affiliates.

This Policy and its general principles will be clearly communicated to all suppliers, contractors, business partners, and third parties.

3- Prohibited interactions

Bribery and corruption are related to 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.

Bribery, corruption, and other similar types of conduct are prohibited, whether between individuals or with civil servants or public and private organizations. At Almirall all types of illegal and criminal practices are prohibited without exception or limits.

Political contributions and donations are completely prohibited.

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 the company to obtain undue or unfair advantages. For this reason, any practice that falsifies, restricts, or aims to eliminate competition must be avoided, such as comparative, false, or misleading advertising, as well as the denigration of Almirall competitors.

Almirall completely prohibits and rejects any practice or conduct that involves incitement to prescribe our medicines in breach of regulations, or by disparagement of the competition, or false or misleading advertising.

Only gifts and hospitality legally allowed under the applicable code of conduct on promotional compliance are excluded from the prohibited interactions.

4- Responsibilities

All Almirall employees, and especially those with specific control or supervision functions, are considered responsible for the prevention, detection, and reporting of bribery and other forms of corruption.

For this reason, Almirall is equipped with the necessary control mechanisms to prevent, detect, and report such practices.

All Almirall employees are requested to notify the corresponding manager of any known situation or any suspicion that bribery and/or corruption has occurred or will occur in the future which could lead to, or imply, a breach of this Policy.

Almirall will protect any employee against potential repercussions in the event he/she refuses or communicates any potential act of bribery or corruption.

All employees and third parties involved with or related to Almirall or any of its affiliates will be obligated to sign the corresponding document, confirming their complete acceptance of this Policy according to the forms correspondingly established by the Company's top management.

Any breach of this policy and/or the aforementioned responsibilities will imply internal disciplinary actions, potential dismissal for gross misconduct, and the application of the corresponding legal liability.

Almirall will provide training on this Policy and its principles to all new employees and to all staff of the company and of its affiliates on a regular basis.

The Chief Executive Officer and all the Management Board members of Almirall 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.

Barcelona, May 6, 2021