

ALMIRALL, S.A.

BOARD OF DIRECTORS

POLICY ON SUSTAINABILITY

Objectives and general principles

This policy responds to the recommendation 54 included in the Good Governance of Listed Companies approved on February 2015 and establishes the common principles and commitments that the company has voluntarily adhered to in its dealings with its stakeholders. The policy is intended to set the general framework for activities for the management of the Sustainability and ES&G practices assumed by Almirall and to serve as the basis for integrating it into the Business Model and strategies of the company.

Almirall understands Sustainability as the responsibility of the company for its impact on society and environment. To fulfill this responsibility, Almirall is committed to integrating ethical, social and environmental concerns in its core business strategy and operations in close collaboration with its stakeholders with the aim of:

- Maximizing the creation of shared value for its shareholders and for other stakeholders, and society at large.
- Encouraging a culture of ethical behavior that increases business transparency.
- Enhancing the reputation and the external recognition of the company.
- Identifying, preventing and mitigating possible adverse impacts caused by its activity.

The actions developed within the framework of the Policy will be voluntary for Almirall. This Sustainability policy is aligned with the Almirall's Code of Ethics, which states the expectations of the company towards its employees and sets the values and ethical standards that apply to its activity and its relationship with its stakeholders.

To achieve the aforementioned objectives, the company adopts the following general principles:

- Align its conduct with the principles contained in the Code of Ethics and in the rest of Global Corporate Rules, which rules the behaviors of all Almirall's employees in the execution of their activities.
- Encourage communication and dialogue with its main stakeholders through diverse communication channels, promoting relationships based on mutual trust.
- Encourage transparency on disclosing information regarding Almirall's performance and activities and adopting responsible communication practices to prevent manipulation of information and protect integrity and Almirall's reputation.
- Manage proactively the non-financial risks and opportunities deriving from the markets and the business operational context.
- Ensure creation of shared value for shareholders and other stakeholders in the long term.
- Reduce the environmental impact of its activities on the areas where it operates.
- Comply with applicable laws and regulations in the countries in which it operates.

Corporate strategy, responsible commitments and practices

1- Employees

Almirall works to obtain, promote, and retain talent and empower its employees to grow and develop their potential. Almirall specifically assumes the following commitments:

- Implement practices and preventive actions to attain the maximum level of health and safety in the workplace. Furthermore, the company invests in adequate new health promotion strategies to enable the workplace to become a reasonable vector for transmitting healthy lifestyles for workers.
- Establish a remuneration that favors the hiring of the best professionals.
- Respect diversity and promote equal opportunities and non-discrimination based on gender, age, disability or any other circumstance.
- Provide the employees a framework of conditions and opportunities that allow them continuous professional development. The talent book is available on the corporate intranet (Sphere) for all employees and provides tools to guide them and facilitate their development and growth.
- Respect the employee's right to intimacy, in all its forms and manifestations, and especially concerning their personal data, according to applicable local legislation.

2- Health sector, scientific and academic community and patients

Almirall's relationship with professionals in the health sector, and with the scientific community in general, are governed by the principles of transparency, proximity and cooperation, based on understanding the needs of these groups in order to execute joint programs and projects that contribute to the improvement of people's health and wellbeing. Almirall specifically assumes the following commitments:

- Provide innovative skin health-focused drugs and medical solutions that satisfy the needs of healthcare professionals and those they help.
- Ensure adequate and sufficient funding for our R&D activities and our cooperation with universities, research centers and other companies.
- Ensure that interaction with the scientific and academic community and with patient organizations is based on the principles of legality, transparency and value contribution. Almirall publishes information each year on its corporate website regarding its transfers of value to healthcare professionals and its collaboration with patient associations.
- Promote knowledge exchange with the medical community and collaboration with academic institutions, hospitals and scientific associations to raise awareness of diseases. In addition to the mandatory communications to the relevant authorities, Almirall publishes basic information on its website about the registration and results of our clinical tests.
- Spread a greater understanding of pathologies for which Almirall provides solutions.

3- Shareholders, investors, financial institutions and auditors

The company is committed to the most demanding standards in its relationship with shareholders, investors, financial institutions and auditors. Almirall specifically assumes the following commitments:

- Work to achieve sustained profitability consistent with the resources invested.
- Act with absolute respect for the requirements of transparency, objectivity and reliability.
- Observe strict compliance in the disclosure of reliable financial information to the markets on Almirall's operation.
- Facilitate awareness and take all measures necessary to allow shareholders to properly exercise their rights.

- 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 investors' community to access it in an easy and appropriate way.

4- Providers

Respect for the law, contractual commitment undertaken, the quality of service, and contractual good faith form the basis of the relations between Almirall and its providers. Almirall specifically assumes the following commitments:

- Treat the providers with integrity and respect, avoiding attitudes that are heavy-handed, unfair and abusive.
- Make sure that all participants in the value chain comply with the applicable laws and respect the internationally recognized human rights and labor rights.
- Adopt responsible practices in the management of the supply chain in order to reduce and minimize the associated impacts.

5- Society

Almirall acts in full awareness of its surroundings and the social needs in the different countries in which it operates. Almirall specifically assumes the following commitments:

- Strengthen and support the dermatology community through the development of information and the support of training programs and research activities.
- Conduct dissemination actions aimed specifically at patients and their surroundings, in order to facilitate certain changes that promote healthier lifestyles.
- Respect and support internationally recognized human rights in all the areas in which Almirall operates and seek to ensure non-complicity in human rights abuses.
- Support the development of the societies where Almirall operates through the corresponding social programs.
- Collaborate directly and/or indirectly on specific projects in emerging and developing countries, as well as areas in a situation of humanitarian crisis, including direct financial contributions and donations of medicines.
- Perform its activities by properly fulfilling its tax obligations in the different countries in which Almirall operates.

6- Environment

Almirall is committed to the promotion of sustainable development, efficient management of natural resources and pollution prevention. Specifically, Almirall assumes the following commitments:

- Respect the environment by using resources rationally and putting all the control mechanisms available into use in order to minimize the pollution caused by products and processes of its industrial activity.
- Promote the sustainable use of raw materials and natural resources.
- Introduce guidelines to improve the effects that Almirall's behavior has on the environment.
- Promote both individual and collective participation in environmental matters.
- Collaborate with competent environmental authorities and bodies.
- Set environmental objectives and goals according to Almirall's activities.
- Promote actions against climate change by decreasing carbon footprint.

Almirall has established a periodical Health, Safety and Environmental management program with environmental objectives and goals in accordance with regulations and best practices. Every year

Almirall publishes a Health, Safety and Environmental report, which includes the results of its environmental program with respect to previous years, as well as actions taken in the last period.

Responsibilities, monitoring and supervision system

The approval of this Policy lies with the Board of Directors of Almirall, which also adopts the necessary means for implementing and supervising the Policy's development and implementation, and receives the reports concerning its application and results.

With the objective of facilitating the tasks of control, supervision and monitoring this Policy, the Chief Executive Officer will be responsible of the supervision of coordination of all the activities related to Sustainability and, specifically, for proposing the strategic lines and corporate plans, establishing management and control measures and reviewing the Sustainability programs and initiatives.

Almirall undertakes to provide sufficient information on the application, development and results of this policy.

Channels for stakeholders communication, participation and dialogue

Dialogue with the stakeholders enables Almirall to understand how its business may affect or be affected by each of them. Their feedback helps the company to identify their expectations and interests and integrate them into the Almirall's strategies, decision-making and management systems in order to develop responses that are in the best interest of all in the short, medium and long term.

Almirall has multiple channels and tools to ensure the communication, participation and dialogue with its main stakeholders. Almirall is committed to better addressing patients' and doctors' needs by conducting research that responds directly to patients' concerns and developing close relationships with the healthcare professional community. Besides, Almirall carries out an engagement survey periodically to measure and drive the commitment of its employees. Almirall has a defined Provider's Portal with the aim of improving the transparency for approving new providers and ensure up-to-date information on potential providers according to service categories. Almirall uses a variety of communication channels to provide up-to-date information required by the applicable laws for corporate matters and other information considered relevant for investors and the corresponding authorities. Furthermore, Almirall is committed to periodically disclose financial and non-financial information regarding its activities, following widely accepted standards and according to applicable legal requirements.

All the channels and tools are detailed and updated in the corporate website of Almirall. The company will progressively enhance these channels and tools and create new ones.

Barcelona, February 21, 2020