

Ethical Healthcare Interactions Policy

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Authorised use	Approved for external dissemination

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1. Purpose

The purpose of this corporate policy (the “**Policy**”) is to set out the guidelines to ensure ethical conduct when interacting –directly or indirectly - with healthcare professionals (HCP), health care organizations (HCO), government officials (GOs) and patient organizations (PO), (hereinafter referred as “**Healthcare Stakeholders**”).

The Policy applies to any activity or material intended to promote or inform the supply, sale or administration of Almirall’s products throughout the product lifecycle. Activities covered by this Policy include but are not limited to:

- direct or indirect promotion of prescription only medicines and over the counter (OTC) products;
- sponsorship of scientific congresses and meetings of a professional or scientific nature attended by Healthcare Stakeholders;
- the offer of samples to Healthcare Stakeholders;
- the offer of hospitality to Healthcare Stakeholders;
- professional and scientific meetings;
- formal business relationships with Healthcare Stakeholders such as research agreements (clinical trials, studies) or other types of agreements (collaboration, consultancy, etc.), and
- interactions with patients, where permitted.

2. Scope

This Policy applies to Almirall S.A. and all the legal entities of Almirall group (altogether, “**Almirall**” or the “**Company**”) and its respective employees involved in interactions with Healthcare Stakeholders. In the event an external third party is engaged by Almirall to manage interactions with Healthcare Stakeholders, it should abide by this Policy.

3. Policy elements

3.1 Principles

Almirall expects all interactions with Healthcare Stakeholders to be guided by the following principles to ensure the integrity and ethical nature of Almirall activities and interactions:

LEGITIMACY: All interactions and transactions will have a valid and legitimate purpose and must always be carried out in an ethical and professional manner, ensuring compliance with relevant laws, regulations, industry codes, and with Almirall standards and values.

TRANSPARENCY: All interactions and transactions shall be transparent and must be accurately recorded in Almirall records. It must be provided in a way that would not result in adverse reputational impact or embarrassment to Almirall if publicly disclosed.

All payments to Key Stakeholders must be publicly disclosed where required.

PROPORTIONALITY: Anything we provide of value must be appropriate in the circumstances, be reasonable in value when measured by local market conditions and infrequent. Transfers of value shall not exceed the needs of the interaction and payments must be aligned with the agreed internal fair market value (FMV).

NO IMPROPER INFLUENCE OR CONFLICT OF INTEREST: Activities may never be used to improperly influence a decision affecting any of Almirall's business, including any decision regarding the approval, reimbursement, purchase, supply, prescription, dispensing or administration of Almirall products. Any actual, potential or perceived conflict of interest shall be reported in accordance with the Conflict of Interest policy.

3.2 Promotional activities

As it regards to promotional activities it's important to ensure the following key aspects:

No pre-licence promotion

Promotional activities of unlicensed medicines are not permitted unless it is expressly approved, for example in the setting of an international congress or where country regulations allow for marketing prior to price authorization. In most cases, promotional activities may only begin after any necessary marketing authorisations have been granted in the relevant territory.

Disguised promotion is not permitted in any case.

No off-label promotion

All promotional activities must be aligned to the approved indication(s), consistent with the locally approved marketing authorisation and the summary of product characteristics (SmPC) or package insert.

No promotion to patients / members of the public

Promotional activities cannot be made available directly to patients, unless permitted by local law.

Accurate, balanced, fair, objective, complete and substantiated information

Promotional and non-promotional content must be accurate, balanced, fair, objective, complete, not misleading and capable of substantiation.



Every functional area is responsible for knowing and following the processes that the Company has in place for the approval and management of promotional materials, activities and disclosure of transfers of value.

The Almirall Corporate training program must include education based on the Almirall Business Integrity Guide (ABIG) and the principles detailed in this Policy.

The Global Compliance & Privacy team is responsible for routine monitoring of promotional and non-promotional activities while the Internal Audit Department will verify and ensure adherence to these activities.

This Policy is further developed through the following documents:

- Materials review SOP
- Almirall Business Integrity Guide
- Transparency Guide
- Conflict of Interest Policy

4. Governance

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

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 direct manager, People & Culture, the local Compliance officer, the Legal representative or through the [SpeakUp! Channel](#).