

GLOBAL CORPORATE POLICY

External Communications Policy - Policy for communication and contact with shareholders, institutional investors and proxy advisors, and communication of financial, non-financial and corporate information through corporate communication channels and other media

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Authorized use	Approved for external dissemination

Content

Section 1	Purpose	Page 2
Section 2	Scope	Page 2
Section 3	Principles	Page 2
Section 4	Communication Governance	Page 2
Section 5	Speaking on behalf of Almirall	Page 3
Section 6	Communication of Inside Information and Other Relevant Information	Page 4
Section 7	Communication channels	Page 4
Section 8	Approval and updates	Page 6

1. Purpose

The purpose of this Corporate Policy (the “**Policy**”) is, in line with Recommendation 4 of the Good Governance Code of Listed Companies approved by the National Securities Market Commission (“**CNMV**”), as revised on June 2020, to establish the basic principles, responsibilities, process and governance for communication and contact with third parties, including shareholders, institutional investors, proxy advisors, securities markets regulatory agencies and the general public, as well as for the communication of economic-financial, non-financial and corporate information to the market, investors or other stakeholders.

2. Scope

This Policy applies to Almirall S.A. and all the legal entities of Almirall group (altogether “**Almirall**”) and their respective employees.

3. Principles

Almirall applies the following principles in all the corporate communication activities:

- Transparency.
- Equal treatment to shareholders in the same position.
- Appropriate communication to stakeholders in line with best practices.
- Provision of information to the shareholders, respecting their rights and interests.
- Compliance with Almirall Internal Conduct Regulations, as well as with all applicable laws and regulations, including Law 6/2023, of March 17, of the Securities Markets and Investment Services (the “**Securities Market and Investment Services Act**”), Regulation (EU) No 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse (“**Market Abuse Regulation**”), and the Good Governance Code of Listed Companies of the CNMV.

4. Communication Governance

4.1 Corporate Disclosure Board

Almirall has established a Corporate Disclosure Board (the “**CDB**”) composed by the Chief Executive Officer, the Chief Financial Officer, the Chief Legal Officer and General Counsel, the Chief Scientific Officer, and the Head of Corporate Communications as Secretary.

The CDB shall be responsible (together, if applicable, with the corporate governance bodies of Almirall) for overseeing and approving the content and disclosure of any material and any otherwise relevant information which is intended to be published externally by Almirall (communications to CNMV and the broad public through press releases or other media). Examples of this kind of communication include, but are not limited to, achievement of pipeline milestones, licensing agreements and other significant

transactions, business results, significant updates on key products, financial updates, among other relevant topics.

Notwithstanding any different procedures or competent bodies provided for in applicable law and in Almirall's internal regulations, the Head of Corporate Communications and Secretary of the CDB shall manage the submissions of proposals for external disclosure of Almirall's material information to the CDB as well as the internal communication of decisions or requests by the CDB.

4.2 Corporate Communications Department

The Corporate Communications department is responsible for designing and executing the communication strategy of Almirall for external corporate target audiences.

The Corporate Communications department will work jointly with the Investor Relations department to ensure the availability of sufficient, accurate, useful and complete information to the relevant external audiences, in compliance with the principles of this Policy.

4.3 Investor Relations Department

The Investor Relations department is responsible for ensuring that any communication to the shareholders, investors, proxy advisors and securities markets regulatory bodies is made in accordance with the applicable internal regulations of Almirall, as well as in compliance with the applicable laws and regulations. The Investor Relations department shall closely collaborate with the Corporate Communications department on the external release of any information covered by this Policy.

5. Speaking on behalf of Almirall

5.1 Individuals authorized to speak on behalf of Almirall

The individuals authorized to speak on behalf of Almirall in connection with the communication of the information referred to in this Policy are the CEO and other members of the Management Board, and – for their respective target audiences – the designated members of the Corporate Communications department (broad public through media, influencers, and other intermediates) and the designated members of the Investor Relations department (investors, analysts, proxy advisors). Any other person may be specifically appointed as an individual authorized to speak on behalf of Almirall. In this respect, in the legal entities of the Almirall group, the General Managers are designated spokespersons for local corporate communication purposes in their respective countries.

Employees that are not designated spokespersons may only comment or post regarding Almirall using approved corporate materials (regardless of the channel) and shall not make public or privately share any confidential information related to any aspect of Almirall's business.

An internal standard operating procedure associated with this Policy will provide specific guidelines on the use of social media.

5.2 External speaking engagements

Almirall employees must obtain permission from their manager, from the Corporate Communications department or from the Investor Relation department before accepting any external speaking engagement related to the business, products or other matters related to Almirall. The Corporate Communications department will engage any other functional representatives as applicable to the specific case, including the Corporate Compliance department.

Any information about Almirall that is presented externally needs to be fully aligned with existing approved corporate materials.

5.3 External enquiries

In case of external enquiries, the employee who has been contacted shall without delay reach out to the Corporate Communications department or the Investor Relations department, which will define an appropriate action plan to respond to the enquiry. In the event of an enquiry from investors, proxy advisors or shareholders, the Investor Relations department shall coordinate a response strategy and execute (working closely with the Corporate Communications department). Both, the Corporate Communications department and Investor Relations department will closely collaborate to align on relevant responses to external enquiries. In the event of an enquiry from the CNMV, the Corporate Governance department, in cooperation with the Investor Relations department, will coordinate a response strategy which, depending on the nature of the CNMV's request, will be submitted for approval to the relevant corporate governance bodies of Almirall.

6. Communication of Inside Information and Other Relevant Information

6.1 Inside Information

Almirall will make public, through the corresponding regulatory notice sent through the CNMV, all information that is considered inside information in accordance with the applicable regulations and, in particular, with the Market Abuse Regulation and the Securities Market and Investment Services Act. These communications shall be published as soon as possible after learning of the event originating the inside information and prior to its dissemination by any other means contemplated in this Policy.

6.2 Other Relevant Information

Almirall may disseminate, through the channels contemplated in this Policy and through other relevant information notices made public through the CNMV, the remaining information of a financial, operational or corporate nature that any legal or regulatory provision requires to be published or that Almirall considers necessary, due to its special interest, to disseminate among shareholders, investors, proxy advisors or other stakeholders.

7. Communication channels

Almirall shall make available several communication channels, information tools and other initiatives related to information considering the different target groups, while ensuring compliance with the principles established in this Policy. In particular, the communication channels indicated below are made available in relation to shareholders, investors, proxy advisors, the securities markets regulatory agencies, and the general public (including amplifiers like media, influencers, etc.):

- **CNMV**

Almirall will publish the inside information and other relevant information on the website of the CNMV as the general channel for providing shareholders, investors and securities markets regulatory agencies with information of Almirall. The inside information to be reported to the CNMV may not be disseminated by any other means without its prior publication on the CNMV's website.

- **Corporate website**

Second only to the CNMV website, Almirall's website (www.almirall.com) is the main channel for communications between the company and its shareholders, investors and

the general public. For this purpose, the information shall be kept up-to-date, and when needed and possible, made available in both Spanish and English.

Almirall's website includes a separate "Investors" section, which shall include, in addition to the inside information and other relevant information previously communicated to the CNMV, annual, half-yearly and quarterly financial information, the Annual Corporate Governance and Remuneration Reports as well as any other significant report and corporate document required to be published from time to time in accordance with applicable regulations. Additionally, on this section, Almirall shall publish information related to the Annual General Shareholders Meetings and the composition and profile of the Board of Directors, for the appropriate knowledge of shareholders and investors.

Almirall's website shall contain a system to allow shareholders and investors to receive financial information from Almirall by email, as well as an alert system to allow such shareholders and investors to receive notifications regarding the company news and events, in order to promote the ongoing and permanent engagement in the company's life.

Finally, Almirall's website includes a "Media" section, which is the primary channel for hosting press releases and other relevant documentation dedicated for the dissemination of significant Almirall's corporate information (suitable for the general public) and includes for example financial updates, R&D milestones, licensing agreements, updates on corporate activities such as disease awareness and annual reports.

- **Investor Relations Department**

Almirall shall continue to enable, through its Investor Relations department, an open, agile and transparent communication channel to which shareholders, investors and proxy advisors can address any queries and requests for information regarding Almirall's progress, all within the framework of the law and the company's internal regulations. For this purpose, shareholders and investors shall have at their disposal on Almirall's website the contact details of the Head of Investors Relations (investors@almirall.com).

- **Meetings with shareholders and Investor Roadshows**

Almirall may organize informational meetings with shareholders, investors and analysts, to give them suitable information regarding its progress and other points of interest.

Regarding proxy advisors, Almirall may maintain regular contact with them (especially those with a greater market presence) to inform about the company's specific characteristics and environment, so that their voting recommendations can be based on a detailed understanding of Almirall.

Almirall shall endeavour to conduct Capital Markets Days, Roadshows and similar events as needed. All relevant stakeholders can be invited to take part in such events. Information about such events shall be published on Almirall's website, where the corresponding presentations will be made available.

- **General Shareholder's Meetings**

The Board of Directors shall promote and encourage the informed and responsible participation of the shareholders in the General Shareholder's Meetings that are convened. The announcement of the call of the General Meeting, together with the documents required by applicable law, as well as others that the company voluntarily prepares in relation to the Shareholder's General Meetings, shall be published on Almirall's website, promoting informed participation and the exercise of shareholders' rights. The call of the General Meeting shall be also published in the CNMV's website and in the Official Gazette of the Spanish Commercial Registry or one of the most widely circulated newspapers in Spain in accordance with applicable law.

The Investor Relations department is responsible for organizing and coordinating the General Shareholders Meetings, addressing any queries and requests for information from shareholders regarding the general meetings, within the framework of the law and the Company's internal regulations. After the General Shareholders' Meetings, the Company shall publish on the Almirall's website the development of the meeting for the knowledge of the shareholders, as well as any other documents derived from such meeting as required by law and the Company's internal regulations. The Investor Relations department will closely coordinate the activities around General Shareholder Meetings with the Corporate Communications department (especially regarding relevant media interactions).

8. Approval and updates

This Policy is subject to the approval of the Board of Directors of Almirall and supersedes both (i) Almirall's Policy on communication and contact with shareholders, institutional investors and proxy advisors approved on 5 November 2020, and (ii) Almirall's External Communication Policy dated 1 June 2021.

This Policy will be published on the Almirall's website.

Corporate Policy Sponsor:	CEO
Corporate Policy Co-Owners:	Head of Corporate Communications Head of Investor Relations

All employees are required to report any suspected violation of the Corporate Policies 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](#)