

PROMOTIONAL COMPLIANCE POLICY**1- Introduction**

Almirall is fully committed to promote its products in a professional, ethical and transparent manner, resulting in the appropriate use of its medicines and its support of high quality healthcare as well as the improvement of the social wellbeing.

As a multinational pharmaceutical and healthcare company, Almirall conducts business in several countries, engaging in a wide range of activities involving directly or indirectly the promotion of medicinal products (prescription and OTC) and/or of the company itself (corporate activity), interacting both with healthcare professionals and other relevant stakeholders.

This is a highly regulated environment and these activities are subject to local and international laws and regulations. Almirall is a member of IFPMA, EFPIA and local pharmaceutical industry associations and, as such, it is committed to adhering to the Codes issued by these federations and associations regarding promotional activities on medicines and interactions with health care professionals and relevant stakeholders.

2- Objectives

The main objectives within the Promotional Compliance are:

-To ensure that all promotional activities involving Almirall employees and third parties engaged by Almirall comply the applicable Laws as well as relevant internal and external promotional compliance requirements.

-To ensure that all relevant Almirall employees are aware of Almirall's promotional activities compliance system and that it is consistently followed across all Almirall affiliates.

-To establish a truthful transparent and professional promotional activity compliance system to prevent, detect and adequately respond to any potential breaches and to avoid deceptive practices and potential conflicts of interest.

-To set the framework in which all Almirall employees, or third parties working on the company's behalf involved directly or indirectly in Almirall's promotional activities, conduct these activities with healthcare professionals and other relevant stakeholders.

3- Training

Promotional compliance training for all employees is essential to maintain a global understanding of relevant internal and external promotional compliance requirements, and to highlight matters that could be the subject of breaches of such requirements.

Specific promotional compliance training for each role and group of employees should be defined with the support of the responsible of the corresponding department.

Promotional compliance trainings must be an obligatory part of every new employees induction. The level of compliance training should be relevant and appropriate to the role and responsibilities of the employee.

Third parties involved directly or indirectly in Almirall's promotional activities must certify and if requested adequately demonstrate that their employees are adequately trained in promotional compliance matters.

Barcelona, May 6, 2021