ALMIRALL, S.A.	BOARD OF DIRECTORS

CLINICAL TRIALS DATA SHARING POLICY

1- Introduction

Almirall is committed to disclose clinical trial information and share clinical trial data with independent researchers, patients and healthcare professionals according to internationally accepted scientific and ethical standards. Therefore, Almirall is implementing the policies recommended in the EFPIA/PhRMA Joint Position Papers on the Disclosure of Clinical Trial Information via Clinical Trials Registries and Databases and the Principles for Responsible Clinical Trial Data Sharing.

Almirall also discloses clinical trial information to be compliant with the format and timelines requirements of the Health Agencies and International Committee of Medical Journal Editors (ICMJE).

The policy applies to everybody involved in the management of clinical study information and the involved departments will allocate the necessary resources and processes to ensure alignment, consistency and adherent application of this Policy.

2- Principles

Almirall will disclose clinical trials in a manner consistent with applicable national laws and rules governing personal data privacy and protection of intellectual property rights. Clinical trials will be registered and results disclosed by means of recognized public databases such as Clinicaltrials.gov in US, and EudraCT in EU or any other official national registries as required, and published in leading biomedical journals.

In addition, a summary of the clinical trials information will be also made available by means of the Almirall Corporate Website.

All phase III clinical trials will be published irrespective of whether the results are positive or negative. Before any paper submission, the main/principal Almirall author, has an obligation to ensure that contents have been approved by the Publications Committee and data supporting the submission of the clinical trial for publication is in a form that can be understood and reanalysed by others if requested.

Barcelona, May 6, 2021