

SUSTAINABILITY POLICY

In accordance with article 5 of the Regulations of the Board of Directors of Grifols, S.A. (the "**Company**"), the Board in full reserves the right to approve the sustainability policy. This Sustainability Policy was initially approved by the Company's Board of Directors on 27 May 2016 under the name *Corporate Social Responsibility Policy*, and it has been amended on 11 December 2020 (the "**Policy**").

The objective of the Policy is setting out the main environmental and social responsibility principles and commitments of the Company and its Group ("**Grifols**"), as well as serving as a basis to add environmental, corporate governance and social responsibility to Grifols' business model.

Grifols has a unique business model that, on the basis of the guided by the Sustainable Development Goals (SGDs) established by the United Nations, combines an economic, social and environmental scope to create value and magnify the positive impact of its business.

It is a business model that is based from its beginning on a solid corporate governance that interweaves integrity, ethics, safety, quality and innovations as key pillars to continue to help people, as it has been for more than a hundred years, live longer and healthier lives.

These general guidelines must govern the conduct of Grifols, as well as its employees throughout the fulfilment of their duties and in all of their professional relations.

Grifols is committed to report publicly and annually on its performance with respect to the main material sustainability issues, using internationally recognized standards and reporting frameworks in the field of sustainability.

1. OBJECTIVES

- **Integrity and transparency.** Grifols considers that it is essential to promote transparency with the main groups of interest, establishing communication channels that encourage dialogue and providing information in a clear, straightforward, honest and ethical way.
- **Compliance with regulations and prevention of unlawful conducts.** Grifols is fully committed to adhering to the highest level of ethical conduct and to complying with all laws, rules and regulations that are applicable in any country in which they do business.
- **Commitment with the environment.** Grifols is committed to its surroundings and its management is committed to the promotion of sustainable development, the rational use and optimization of natural resources, the improvement of recycling and the assessment of waste materials.
- **Commitment to their teams:** Grifols integrates into its business management the principle of equality and the protection and integration of diversity as a basic element of people management, ensures the protection of labour rights and promotes safe work environments wherever it operates, supporting continuous and updated training of its workforce.

- **Social commitment.** Grifols is committed to its social surroundings. This commitment goes beyond the strict compliance with laws, rules and regulations, ensuring that its business activities have a positive impact on its employees, patients, donors, clients, suppliers and society as a whole.

2. **GROUPS OF INTEREST AND COMMUNICATION**

Grifols uses a variety of communication channels to interact with its groups of interest, including its corporate website.

Patients, patient organizations: Grifols has open lines for on-going communications (email, phone calls).

Plasma donors: Grifols provides information to plasma donors through its website, educational videos and other communication channels. Donors can communicate with Grifols through plasma collection centres and the website.

Customers: Grifols engages with customers (public and private; wholesalers, distributors, group purchasing organizations (GPOs), blood banks, hospitals and care institutions, National Health Systems) to provide clear and honest information about all of our products.

Regulatory bodies: Grifols uses formal channels when engaging with regulatory bodies such as the FDA, EMA and AEMPS and others, for matters related to clinical trials, plasma donation centre authorizations, validation of production facilities and other authorizations regarding the commercialization of therapeutic treatments, including new drugs, indications.

Suppliers (non-plasma materials): formal communication channels are used during certification processes, assessments and audits. For daily operations, informal channels are also used.

Financial community: as appropriate, Grifols discloses material information in compliance with regulations of stock exchanges where the Company is listed (CNMV, SEC, NASDAQ, ISE, etc.) and uses the suitable channel for each case. Grifols communicates with all of its shareholders, investors, analysts and other stakeholders by organizing and attending meetings, including General Shareholders Meetings, work meetings, conference calls and roadshows. Furthermore, Grifols publishes an annual report and quarterly earnings releases, and press releases on the Grifols corporate website and makes them available through distribution lists when necessary.

Employees: Grifols maintains a continuously updated intranet site for employees, and has a screen system in their facilities that displays information of general interest for its employees. It also publishes an in-house magazine and organizes biannual meetings, as well as engaging in informal day-to-day communications with employees. Meetings with the employees' legal representatives are also regularly held.

Local community and NGOs: Grifols works collaboratively and in partnership with numerous NGOs through its foundations and directly supports a range of community initiatives in locations where the Company operates.

Media: Grifols maintains clear and transparent communications with journalists and other media representatives. The Company publishes press releases to announce important events like quarterly and annual results and organizes regular visits to manufacturing facilities.

Scientific community, research partners: collaboration with research partners and other scientific institutions is essential to the ongoing innovation of Grifols products and processes. Activities with the scientific community include involvement in R+D projects, investments and partnerships.

Institutional bodies: institutional bodies, trade groups and other professional organizations are engaged in both formal and informal channels to organize forums, congresses and other business related meetings.

3. MAIN AREAS OF WORK

A. Environment

Grifols gives an efficient answer to one of its main sustainability principles: respecting the Environment. Grifols' environmental management program is guided by the principles set out in its environmental and energy policy and its environmental programme

The Board of Directors is responsible to approve the corporate risk policy, the corporate responsibility policy and the environmental policy. These integrate the management of environmental risks associated with regulatory changes and the establishment of commitments to mitigate climate risks.

The Executive Committee regularly supervises Grifols' performance with regard to the environmental plan, including indicators and lines of action linked to climate change. It also supervises this report, which includes information on Grifols' performance in regards to climate issues.

The Chief Industrial Officer (CIO), in addition to serving on the Executive Committee, is a member of the Environmental Committee. The CIO is responsible for regularly updating the CEOs on the Company's environmental performance, including climate-change issues. The CIO also approves the Environmental Plan and the economic and human resources required to meet the objectives.

Finally, the Risk Committee, which reports to the Board of Directors, is responsible for developing the risk management model and supervising the most relevant risks, including those related to climate.

The Environmental Management program is ISO 14.001 certified and it ensures that all the applicable environmental legislation is identified and complied with; that the environmental impact of the Company's manufacturing processes and/or

products is fully understood; and that the Company implements the necessary measures to prevent environmental degradation. Each Grifols company has an environmental committee which analyses the environmental management program periodically and also introduces improvements. These are mainly focused on the optimization of natural resources, such as water and energy conservation, as well as initiatives for recycling and assessing waste materials.

Grifols provides training and encourages its employees to take responsibility, which is fundamental in preserving the environment, in their respective business areas and in identifying new opportunities for improvement. Sound environmental practices are integrated in manufacturing processes and other areas of the Company to ensure correct environmental management. Grifols applies eco-design criteria in all new premises and equipment that it manufactures, thereby preventing and minimizing the environmental impact across all stages and operations.

Each year Grifols publishes a report, which, among other financial and non-financial issues, includes the environmental results of the most recent years, as well as the actions undertaken on the last period.

Grifols conducts its activity respecting the environment in which it operates and for this reason, the Group's companies undertake to:

- To promote awareness and train employees to adopt good environmental practices within the workplace.
- To minimize the environmental impact of new products and processes during the stages of design, manufacturing, transportation, usage and disposal.
- To identify and comply with applicable legal requirements and other principles to which the organization subscribes.
- To establish environmental objectives and targets according to company activities, in order to continuously improve performance.
- To implement pollution prevention techniques in order to minimize the environmental risks involved in company activities, taking into account the effects of climate change.
- To organize a system to engage stakeholders in communication and dialogue on company environmental issues.
- To set up programs for the protection and conservation of nature areas belonging to the Company and to protect those areas where it has a direct influence.

B. People management

Grifols works to create a work environment that guarantees equal opportunities in all areas, showcasing diversity and inclusion and promoting the professional development of employees, ensuring strict compliance with labour rights and therefore guaranteeing certain conditions of decent work and wages.

Grifols commits to maintain an open dialogue based on trust and respect with employee representatives, foster the acquisition of new knowledge and continuous training, guarantee equal opportunities, encourage teamwork, offer a professional development model based on systematic processes for assessing attitudes, performance and behavior and offer competitive compensation packages.

Grifols is especially proud of the diversity of its staff, which it considers an asset. The Company is committed to maintain a work environment free from discrimination and harassment based on race, religious beliefs, nationality, gender, disability, sexual orientation, age or any another reason.

Grifols subscribes to the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights of Work and its framework for action, based on eight fundamental rights. Among these the Company respects on the part of the organization for the right of employees and employers to create their own organizations and to join them as an integral part of a free and open society, as reflected in the “Freedom of Association and Protection of the Right to Organize Convention” 1948, (No. 87) and the “Right to Organize and Collective Bargaining Convention”, 1949, (No. 98).

C. Well-being, Occupational Health and Safety

A healthy risk-free working environment is part of Grifols' commitment to its employees, as set out in the Grifols' health and safety policy. This policy focuses on continuously applying the strictest health, safety and risk prevention criteria in the workplace. Health and safety activities are systematically and generally carried out in accordance with the Health and Safety scheme included in the management program.

Grifols' occupational health and safety policy guarantees that all of the group's companies, as well as collaborating companies, carry out their activities in compliance with the regulations, rules and provisions applicable in each country, in accordance with the national legislation, and also in compliance with Grifols own safety standards.

The Health and Safety area provides objectives at the corporate level and each company then determines its annual goals on health and safety. Grifols also supervises Health and Safety Management Systems of the subsidiaries through an audit program. Each company administers and implements the occupational health and safety management system.

The active participation of Grifols' employees in occupational Health and Safety teams and committees not only helps identify and control the risk of hazards but

also encourages and promotes the importance of occupational health and safety within the Company.

Control of the corporate health and safety program is carried out at three levels:

- Monthly monitoring of key performance indicators
- Assessment visits to all companies and monitoring of preventive plans
- Corporate audits

- **OHSAS 18.001:2007 Certification**

Grifols' work centres in Spain are OHSAS 18.001:2007 certified. The international subsidiaries have established their own individual systems that are adapted to each country in alignment with corporate policies.

Grifols' Health and Safety management system is based on a process of continuous improvement. At Grifols, this continuous improvement is developed by adequately defining management objectives for each group of companies, by closely monitoring the technical and organizational aspects of health and safety planning, by applying active and reactive efficiency system controls, using external and internal audits, and finally by the active participation of each company' management in the employees' health and safety policy. Grifols has a risk prevention department which provides services to all the group's companies. This department has qualified technicians in the different risk prevention areas, and a medical service for health surveillance and risk prevention.

- **Awareness and Training Programs**

Health and Safety training is intended to guarantee that every employee has the right information related to risk prevention and puts it into practice. This applies not only when a person first joins the Company but also when there is a change in his/her responsibilities, or when new technologies or operational changes are introduced. This training focuses on the role of the employee and his/her workplace, and it adapts to changes in risks.

- **Safety in the Installation and Process Design**

The most effective way to ensure people's safety is to correctly identify possible hazards when designing installations. Grifols has defined a series of standard procedures that serve as a reminder of all the possible areas of risk when designing installations, purchasing new equipment and modifying production processes.

D. Respecting Human Rights

Respecting the dignity of any individual and the rights that are inherent to him/her, is, above everything, an indispensable action requirement for Grifols. The fundamental principles of bioethics guide Grifols' approach in the research, development, production and commercialization of its products with the objective

of protecting the security and dignity of everyone involved in its value chain, while approaching scientific advances in the healthcare sector from an ethical perspective. Furthermore, as part of Grifols' commitment, it supports and preserves the well-being of the diverse communities where it operates.

Using international frameworks as reference points (United Nations Global Impact, OECD Guidelines for Multinational Enterprises, UN Human Rights, and ILO Tripartite Declaration of Principles Concerning Multinational Companies), Grifols promotes responsibility and commitment to human rights in all of its operations, including the refusal of any child or forced labour in the entire value chain.

E. Commitment with plasma donors

Grifols' first and foremost priority is the health, safety, well-being and dignity of the donors. All donors are treated equally, regardless of race, religion, work status and socioeconomic profile.

Grifols applies the same quality and safety criteria in all of its plasma centres and to all donors. All donors are subject to the same strict quality and safety standards throughout Grifols' global network of plasma donation centres without any exceptions.

F. Commitment with patients

Grifols works closely with patients and patient associations as part of its commitment with them.

The aforementioned commitments are materialized in:

- Promote and provide access to Grifols treatments.
- Maintain and provide the history, passion and pioneering spirit that sets Grifols apart.
- Engage and support patient-focused educational programs and activities

G. Social Commitment

Contributing to the health and well-being of every person in the world is Grifols' commitment from its beginnings. Therefore, beyond any economic impact created by Grifols' business activity, Grifols' main objectives are to educate, defend, involve and support. In this regard, it has a social-investment framework modelled on the following lines of action: access to treatment programs, educational and social welfare initiatives; support for local communities and patients associations ; initiatives and awards to promote the development of scientific, research and educational projects; special initiatives and projects to improve healthcare and humanitarian aid; and collaborations with non-profit entities to stimulate social progress.

Grifols supports various foundations, amongst them:

- **Victor Grifols i Lucas:** the mission of the Víctor Grifols i Lucas Foundation, created in 1998, is the promotion of bioethics through a dialogue between specialists from different areas of knowledge. The Foundation seeks to promote ethical attitudes in organizations, companies and individuals active in the field of human health. To achieve this, it offers a discussion platform that provides a forum to exchange ideas about the ethics of life.

To carry out its mission, the foundation has the following objectives:

1. To promote research in specific areas of bioethics by awarding grants and prizes.
 2. To organize conferences, seminars and workshops to raise awareness of and explore ethical issues which are constantly being encountered in the life and medical sciences.
 3. Produce publications to divulge the foundation's work, as well as other documents related to bioethics.
 4. To work with organizations, universities and other educational institutions in order to conduct research and produce publications that contribute to the deeper understanding of the ethics of life.
- **Fundación Probitas:** The Probitas Foundation, founded in 2008, contributes to the improvement of medical care in areas with limited resources or knowledge by providing aid in healthcare matters in which Grifols has knowledge.

The Probitas Foundation has set out the following strategic lines of action:

1. To reinforce medical services and empower the population in vulnerable regions, by installing equipment and infrastructures for the diagnosis and treatment of diseases.
2. To encourage the participation and training of the personnel of each project in order to create capacity-building at a local level so that the people benefitting from the training will also be responsible for the health services of their community.
3. To promote integral health programmes such as access to drinking water, sanitation and food security in the vulnerable areas where the Foundation is already present.
4. To reinforce the blood banks in the health centres and hospitals of the most disadvantaged areas.
5. To take action in exceptional situations such as catastrophes or humanitarian crises of either human or natural origin.

6. To give support to other entities which share the same objectives and values in order to reinforce and improve the structures of health centres and/or hospitals in the world's most disadvantaged regions.
 7. To encourage interventions related to health in vulnerable collectives in developed countries with Grifols' *expertise*.
- **José Antonio Grifols Lucas Foundation.** The mission of the José Antonio Grifols Lucas Foundation, in the United States, is to support educational and health programs to improve the wellbeing of communities and the social environment of more than one million people who donate their plasma at Grifols' donation centres. The Foundation, which was created in 2008 in honour of Dr. J.A. Grifols, inventor of the plasmapheresis technique, recognizes the invaluable support of our plasma donor population who, through the donation of plasma and the products made from it, empower our mission to save lives.

As a result of Grifols' commitment with society, the organization has founded the Grifols Academies in Spain and in the United States.

- **The Grifols Academy Professional Development.** The Academy focuses on providing training and career development to employees. It aims to communicate Grifols' corporate culture, as well as the way of understanding and conducting business. Training is organized in three areas: scientific and technical knowledge, development of skills and corporate culture, and knowledge of Grifols.
- **The Grifols Plasmapheresis Academy in the United States.** The Academy offers advanced training on: all plasmapheresis procedures, the collection, analysis and control of plasma, the preparation of medical hemoderivatives, and ethical and quality knowledge focused on human health. Through the Grifols Plasmapheresis Academy, the group aims to transmit its knowledge, to standardize work procedures and to retain top talent, in addition to extending its corporate culture in those companies located in the United States.
- **The Grifols Immunohematology Academy:** offers educational programs on transfusion medicine to professionals globally. Its goal is to contribute to advancement of knowledge in this field in order to provide better patient care.

H. Monitoring regulations and preventing unlawful conducts

a. Code of Conduct

Grifols' Code of Conduct, which was approved by the Company's Board of Directors, with the support of the Audit Committee, on 26 October 2012, aims to establish the general guidelines which must govern the conduct of Grifols and all its employees in the performance of their duties and in their

professional relations, acting in accordance with the laws of each country where the each of the Group's companies operates.

Grifols' Code of Conduct may be found on the Company's website.

<https://www.grifols.com/documents/51507592/1023105310/code-of-conduct.pdf/2e569a7b-3ab7-48cc-97d1-ec14fe168752>

b. Code of Ethics for the executives and directors

Since its inception in 1909, Grifols has always been ruled by an unwritten philosophy or spirit of ethics that places the safety and efficacy of its products as its foremost priority. Grifols has never given priority in its decisions to economic criteria but rather to producing and distributing the highest quality products for the patients, consumers and healthcare providers it serves.

With the goal of never losing or compromising its corporate philosophy, a Code of Ethics has been drafted to govern employees and others working for Grifols. This Code must be viewed as a general framework of basic principles only and not limiting in any way, since it is not possible to develop, in writing, all the ethical criteria that must rule the activities of Grifols.

While the Code should govern the behaviour of all employees of Grifols, it is specifically subscribed by certain individuals whose decisions have more of a direct effect on the activities of Grifols, that is, the administrative bodies and executives of the Group's companies.

c. Grifols Ethics Helpline

Grifols Ethics Helpline is a reporting system enabled by Grifols by phone or over the Internet, which enables Grifols employees and third parties to confidentially and anonymously raise concerns about ethical issues and report any ethical misconduct or potential breach of applicable laws, rules and regulations, or Grifols policies or procedures, without fear of retaliation.

All reported allegations are dealt with in accordance with the standard operative procedure established to guarantee that they are thoroughly and appropriately investigated and to determine that no further action is required. To ensure the proper functioning of this process, Grifols appointed an Ombudsperson.

d. Anti-Corruption Policy

The Anti-corruption policy provides guidance to the directors, employees and governing bodies of Grifols and its affiliates around the world, as well as to third parties, setting out the appropriate standards of conduct for interaction with government officials and other identified private individuals. Furthermore, this policy includes prohibitions against

solicitation and acceptance of bribes by members of Grifols and third parties.

To guarantee compliance with anti-corruption policies and procedures, Grifols regularly carries out training sessions for its current employees and new joiners. Additionally, those employees who, because of their duties in Grifols interact more often with civil servants or carry out duties that are in general related to the commercialization of Grifols' products or services, receive additional and enhanced training.

Grifols' Anti-Corruption Policy may be found on the Company's website.

<https://www.grifols.com/documents/51507592/51526521/anti-corruption-policy-en.pdf/8281324c-64cc-48e4-8350-bcaf79cbd2fe>

e. Crime Prevention policy and Crime Risk Management System.

Grifols has a Crime Prevention Policy, which aims to reinforce Grifols' unequivocal rejection of the commission of crimes, offences or any other type of unethical behaviour and its steadfast determination to prevent and combat these actions. This policy is developed through the implementation of a program called the Crime Risk Management System (CRMS), whose objective is to guarantee, before public administrations, judicial and administrative bodies and third parties, that Grifols effectively complies with its duties of supervision, monitoring and control over its board of directors, members of management, employees and other dependent individuals or entities, by establishing suitable measures to prevent crimes or significantly reduce the risk of their commission.

The CRMS is subject to the review of an independent expert, with the objective of determining the existence of a crime prevention system according to the provisions established in the regulations in force, and confirming that it includes adequate and effective control measures, both in terms of its design and operational effectiveness, to prevent and detect crimes.

Grifols' Crime Prevention Policy may be found on the Company's website.

<https://www.grifols.com/en/corporate-policies>

f. Money laundering

Grifols has mechanisms, procedures and policies in place to prevent money laundering and respond to any possible breaches detected in the course of the Company's operations.

- Prevention: The Code of Ethics and the Code of Conduct establish measures to prevent money laundering, serving as a guiding principle for the entire organization and its employees.

- Detection: The regular reviews carried out by CRMS include concrete actions to detect the risk of money laundering. The Company also has a channel of communication open to employees and third parties to anonymously report any concerns of possible ethical misconduct (Grifols Ethics Helpline).
- Reaction and Response: Grifols has a reaction and response protocol, as well as a sanctions system, to address any claims of unethical behavior or irregularities using all means possible, and if necessary, take corrective actions to prevent them from happening in the future.

g. Transparency

Industry interactions with the medical profession have a profound and positive influence on the quality of patient treatment and on the value of research. As primary providers of healthcare services, both healthcare professionals and healthcare organizations, offer us unique, independent insights and expert knowledge on patients' behaviour and management of disease. The capacity of gaining access to this expertise plays a critical role in informing and guiding industry efforts to improve the quality of patient care and treatment options. And that is why both healthcare professionals and healthcare organizations should be fairly compensated for their input and for the services they provide to the industry.

Industry interactions with healthcare professionals and healthcare organizations should not only be conducted with integrity but should also be transparent. We therefore fully support and have voluntarily adopted the practices reflected in the new EFPIA Code, and will continue to support any other country codes of conduct which promulgates transparency reporting.

The information related to the legal requirements of transparency can be accessed through the Company's corporate website.

<https://www.grifols.com/en/ethics-and-compliance>

h. Communication and contact with shareholders and institutional investors

The Policy for communication and contact with shareholders and institutional investors is based on the following general principles, which shall be applied to the information and communications of Grifols:

- Principles of transparency, veracity, equality, symmetry and importance in the distribution of information.
- Equality in the treatment of all shareholders and financial market participants concerning the acknowledgment and exercise of their rights, as long as they have the same position and they are not affected by conflicts of interest.

- Protection of the rights and legitimate interests of all the shareholders.
- Promoting the use and set up of channels and tools for communication that encourage an efficient communication between Grifols and its shareholders, institutional investors and other financial market participants in general.
- Achieving a provision of information and communication which are transparent and in accordance with corporate interests, always trying to make the most from the advantages provided by new technologies, seeking the continuous and long lasting creation of value for the shareholders.
- Compliance with the applicable legislation at any given time, and especially with Grifols' internal operating regulations and corporate governance.

I. Monitoring and follow-up mechanisms.

The Board of Directors of Grifols entrusts the monitoring and compliance of this Policy, as well as the risks associated with it, and its management, to its Sustainability Committee in order to fulfil its mission of promoting the social interest and taking into account, as appropriate, the legitimate interests of the other stakeholders. Also, the Sustainability Committee will monitor non-financial risks, including ethical and business conduct aspects.

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THIS DOCUMENT CONSTITUTES A TRANSLATION INTO ENGLISH OF THE OFFICIAL SPANISH VERSION. IN CASE OF DISCREPANCIES, THE OFFICIAL SPANISH VERSION SHALL PREVAIL.