

## Supplier Sustainability Policy

### Owner: Global Procurement

#### Purpose

The purpose of this Supplier Sustainability Policy (the “**Policy**”) is to systematically integrate environmental, social and governance (“**ESG**”) criteria into Grifols’ supplier evaluation, review and monitoring processes, aligning them with the sustainability objectives and strategy set out in the Grifols Sustainability Policy.

This Policy is inspired by the main international supply chain due diligence frameworks (including, among others, the United Nations Sustainable Development Goals (SDGs)) and establishes a sustainability due diligence procedure covering the identification, assessment and management of risks associated with supplier selection and relationships, promoting responsible and sustainable practices.

#### Scope

This Policy applies to all current and future suppliers of Grifols, S.A., its subsidiaries and any company administered, directed or managed by Grifols, S.A. or its subsidiaries (“**Grifols**”) that fall within the scope of Global Procurement and form part of Grifols’ supply chain.

#### Principles

The following principles shall be observed in the application of this Policy:

- Identify, assess and manage ESG risks and impacts on the environment and society arising from suppliers.
- Ensure traceability and transparency throughout the supply chain.
- Promote collaboration with suppliers to develop innovative solutions and continuously improve ESG practices.
- Apply a risk-based, proportionality and continuous improvement approach, in line with international due diligence standards.

#### Monitoring and Assessment

To ensure suppliers’ compliance with ESG criteria, periodic monitoring and assessment mechanisms will be established, based on the level of risk identified and the characteristics of each supplier. In this regard:

- Global Procurement is responsible for designing, coordinating and executing the supplier ESG assessment procedure, in collaboration with the Investor Relations and Sustainability department.
- Assessment and monitoring will be conducted through specialized ESG assessment platforms such as EcoVadis or equivalent, supplemented, where appropriate, by specific

questionnaires, document reviews and other due diligence tools, as Global Procurement considers appropriate at any given time.

- Regular and transparent communication with suppliers will be encouraged to ensure the updating of ESG commitments and the implementation of corrective action plans when necessary due to identified incidents or non-compliance with Grifols' ESG standards.
- The results of the assessments will be integrated into decision-making processes and ongoing supplier relationships, thereby promoting continuous ESG improvement.

## Guidelines

For the purposes of evaluating, selecting, and managing suppliers throughout Grifols' supply chain, the following ESG guidelines shall apply:

### 1. Environmental

- Product and Service Selection: Prioritize the procurement of products and services that minimize environmental impact and promote energy efficiency and the reduction of greenhouse gas emissions.
- Supplier Assessment: Assess suppliers based on their commitment to environmental management, including emissions reduction, efficient use of natural resources and the implementation of circular economy practices.
- Sustainable Materials: Encourage the use of recycled, recyclable and/or biodegradable materials, as well as the adoption of clean and sustainable technologies.
- Environmental Reporting and Management Systems: In alignment with Grifols' climate objectives, suppliers shall report their greenhouse gas (GHG) emissions (Scopes 1 and 2) and shall be required to implement all reasonable measures to reduce such emissions. In addition, suppliers should maintain appropriate environmental management systems.

### 2. Social:

- Human and Labor Rights: Select and maintain relationships with suppliers that respect human and labor rights, ensuring safe, fair and dignified working conditions for all employees. Forced labor, child labor, human trafficking and abusive recruitment practices or practices associated with modern slavery are expressly prohibited, in accordance with applicable regulations.
- Belonging and Inclusion: Promote inclusion within the supply chain by encouraging the engagement of suppliers that implement inclusive and equitable policies.
- Health and Safety: Require suppliers to provide safe and healthy working environments, complying with applicable occupational health and safety regulations and implementing appropriate management systems.
- Community Impact: Assess the social impact of suppliers' operations on their local communities, fostering practices that positively contribute to their social and economic development.

### 3. Governance:

- Legal and Regulatory Compliance: Ensure that suppliers comply with all applicable laws and regulations, including, without limitation, environmental, labor, safety, cybersecurity and data protection regulations.
- Ethical Practices: Promote ethical and transparent business practices, including the fight against corruption and fraud, and the implementation of corporate social responsibility policies by suppliers.
- Audit and Control: Implement audit and control mechanisms to verify suppliers' compliance with ESG standards, including periodic audits and the request for performance reports.
- Cybersecurity and Data Protection: Suppliers shall ensure appropriate cybersecurity and data protection practices, especially when processing information or accessing Grifols' systems, in alignment with applicable regulations.

## Assessment Phases

### (1) Initial Phase

In the initial phase, suppliers are required to provide the information necessary for Grifols to initiate the assessment process, through various tools such as onboarding questionnaires or Grifols platforms such as EcoVadis, as determined by Global Procurement in each case.

Additionally, suppliers should sign the Grifols Supplier Code of Conduct or demonstrate that they have adopted a code of conduct that is substantially aligned with Grifols' standards.

At this stage, Global Procurement may reject the onboarding of a new supplier and therefore not authorize the formalization of the business relationship where any of the following circumstances apply:

1. the supplier refuses to sign the Grifols Supplier Code of Conduct or fails to provide its own code of conduct aligned with Grifols' Supplier Code of Conduct, as applicable; and/or
2. there are indications or suspicions that the supplier has been involved in serious ESG incidents, such as forced labor, corruption or environmental incidents, and the supplier fails to provide information allowing such risks to be ruled out or mitigated.

## **(2) Risk Assessment Phase**

### **A. Inherent ESG Risk Assessment**

The inherent ESG risk (the “**Inherent Risk**”) is determined by considering four key factors:

- (i) the ESG risk of the supplier’s country of operation,
- (ii) the ESG risk of the industry in which the supplier operates,
- (iii) the nature of the supplier (e.g., whether it provides direct goods or services (that form part of or are used in a final product) or indirect goods or services (that do not form part of or are not used in a final product), as well as the criticality of the goods or services provided), and
- (iv) the potential business volume involved.

Five Inherent Risk categories are established:

- Minimum Risk: suppliers of indirect goods or services with an amount below EUR 500.000 and suppliers of direct goods or services with an amount below EUR 100.000.
- Low Risk: all suppliers not categorized as minimum risk with low country and industry risk.
- Medium Risk: suppliers not categorized as minimum risk with medium country or industry risk. If either factor (country or industry) is medium, the risk will be considered medium.
- High Risk: suppliers not categorized as minimum risk with high country or industry risk. If either factor (country or industry) is high, the risk will be considered high.
- Critical Risk: high-risk suppliers with significant purchasing volumes exceeding EUR 5.000.000 or considered critical by Global Procurement.

Different ESG performance assessment procedures will be defined and conducted depending on the level of Inherent Risk identified.

### **B. ESG Performance Assessment**

The ESG performance assessment of a supplier is based on its ESG-related procedures, policies, evidence, results and efforts (the “**Performance Assessment**”). Grifols will conduct a Performance Assessment conditioned on the identified Inherent Risk level. Suppliers classified as minimum risk are not required to complete additional ESG procedures beyond the compliance with the Supplier Code of Conduct.

For suppliers classified as high or critical risk, as well as direct goods or services suppliers classified as medium risk, all information deemed necessary will be requested. Based on this information, the Sustainability Manager within Global Procurement shall assess whether the Inherent Risk level is adequately mitigated.

The assessment will be based on a questionnaire developed by Global Procurement that analyzes supplier practices concerning environment, human rights, ethics and responsible sourcing. In addition to collecting information, suppliers are required to provide documentary evidence supporting the reported policies, procedures and results. The questionnaire is designed to provide a comprehensive view of the supplier’s ESG performance, considering factors such as management systems, certifications, metrics and implemented actions, adapted to the company’s sector, size and location.

Suppliers of direct or indirect goods or services classified as low risk, and suppliers of indirect goods or services classified as medium risk, will only be required to undergo a simplified procedure based on the collection of basic and critical ESG information through an abbreviated questionnaire developed by Global Procurement.

The Performance Assessment will be defined at three levels: High, Medium and Low.

### **C. Combined ESG Risk Assessment**

The combined ESG risk assessment of the supplier is obtained by combining the **Inherent Risk** and the **Performance Assessment**, resulting in the classification of risk into three possible levels (Low, Medium and High). Accordingly:

- If the result is Low risk, no additional procedures are required.
- If the result is Medium or High risk, a corrective action plan will be agreed with the supplier to improve its assessment. Corrective action plans must include, among other requirements, defined timelines, clear responsibilities and verifiable metrics. In both cases, if after one year the supplier does not improve its scores and does not implement the corrective measures indicated by Grifols, Grifols may suspend or terminate the business relationship.

Additionally, for suppliers approved as of the effective date of this Policy, a process will be initiated to distribute the Supplier Code of Conduct and Grifols Policies (Human Rights Policy and Sustainability Policy) through the tools available at Grifols.

Global Procurement will conduct periodic renewals of the combined ESG risk assessments (Inherent Risk + Performance Assessment) based on each supplier's risk level (Low, Medium or High). Reviews will be conducted annually for suppliers classified as High or Medium risk and every three years for those classified as Low risk.

Suppliers must use secure channels to report ESG incidents to Grifols so that they can be assessed, and Grifols may request additional information where there are substantiated suspicions of non-compliance.

## **Training**

ESG training shall be provided to members of the Global Procurement team and to suppliers, as determined by Global Procurement based on ESG risk exposure, with the aim of ensuring appropriate understanding and effective implementation of sustainability principles and requirements across the supply chain. Training shall include, at a minimum, ESG fundamentals, assessment methodologies, applicable regulatory requirements and Grifols' best practices.

Training will be mandatory and periodic, including onboarding sessions for new Global Procurement employees and updates following relevant changes to this Policy.

## **Governance**

This Policy is owned by Global Procurement and shall be periodically reviewed to ensure continued alignment with applicable legislation and national and international best practices. Global Procurement shall also be responsible for the implementation and ongoing monitoring of this Policy.

In addition, Grifols, through its Internal Audit department, conducts periodic audits of various departments and operations. As part of such audits, or as otherwise deemed necessary, Internal Audit may review and monitor compliance with this Policy and any procedures derived from it and may identify appropriate improvements to such policies and procedures.

## Policy Validity

This Policy is effective as of April 17<sup>th</sup> 2026, following approval by the VP of Global Procurement, Núria Jorba, and the Chief Industrial Officer, Daniel Fleta.

The approval of this Policy has been formalized in its Spanish version. This English version is a translation and is subordinate to the Spanish version, which shall prevail in the event of any interpretation or application.