

HUMAN RIGHTS POLICY

INTRODUCTION

A deep-seated respect for human dignity and human rights underpins all Grifols' activities.

The fundamental principles of bioethics guide Grifols' research, development, manufacture and marketing of its products in order to guarantee the safety and dignity of everyone involved in Grifols value chain. By following these principles, Grifols' also ensures its healthcare contributions are carried out with an ethical approach.

Diverse regulations, declarations and codes, including the United Nations International Bill of Human Rights and the Universal Declaration of Human Rights (1948), the Helsinki Declaration (1964) and the Universal Declaration on Bioethics and Human Rights of the United Nations Educational, Scientific and Cultural Organization (UNESCO) (2005) form the foundation of these principles. In 2011, the United Nations Human Rights Council approved the "Guiding Principles on Business and Human Rights."

Predicated on existing international law obligations, these principles provide a global framework to address the fundamental responsibilities of businesses in protecting human rights. Grifols has firmly and repeatedly communicated its support of the Ten Principles of the United Nations Global Compact derived from Universal Declaration of Human Rights and other international human- and labor-rights declarations.

Grifols aims to promote and protect the welfare of all communities in which it operates. It uses international references as a starting point to foster corporate responsibility and human rights in all its activities, including the rejection of child labor throughout its value chain. Grifols is also committed to taking steps to prevent and ensure that modern slavery is not taking place in any part of its supply chain or its business.

Grifols' efforts to guarantee human rights in its operations are guided by the following covenants:

- The International Bill of Human Rights, comprising the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights
- The fundamental rights in the eight International Labor Organization (ILO) core conventions as established in the Declaration on Fundamental Principles and Rights at Work
- The European Charter of Fundamental Rights
- The World Medical Association's Declaration of Helsinki
- UNESCO's Universal Declaration on Bioethics and Human Rights

In parallel, Grifols also respects and observes all applicable laws, regulations and international human right conventions, including:

- The UN Guiding Principles on Business and Human Rights
- The Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises
- The UN Global Compact, of which Grifols is a signatory and supporter of its 10 principles
- The ILO Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy

Grifols recognizes governments' responsibility to protect human rights via effective policies, regulations and enforcement, as well as the role of businesses in upholding them. Further, Grifols believes that a proactive business approach is essential to protecting human rights and driving sustainable development.

PURPOSE

This human rights policy (the "**Policy**") outlines Grifols' commitment to promote internationally recognized human rights standards and principles in all areas of operations and sets forth the basic principles guiding Grifols' human rights governance in order to identify, prevent, mitigate and address any adverse effects arising directly or indirectly from its business activities.

SCOPE

This Policy applies to all employees of Grifols, S.A., as well as its affiliates, and any company managed, directed or operated by Grifols, S.A. or its affiliates worldwide ("**Grifols**") to guide their relations concerning human rights.

In companies where Grifols has an interest but does not have effective control, Grifols will encourage the principles and guidelines set forth in this Policy are followed.

Further, Grifols will promote the principles and guidelines set forth herein among its partners third party vendors such as suppliers, distributors, agents and consultants representing or working on behalf of Grifols.

COMMITMENTS TO RESPECT HUMAN RIGHTS

Grifols' support and respect for fundamental human rights is reflected in its corporate strategy and the Grifols Code of Conduct, Sustainability Policy, and Inclusion and Belonging Policy, among others, all being embedded throughout Grifols.

The following seven core principles support Grifols' commitment to human rights:

1. HUMAN RIGHTS FOR GRIFOLS EMPLOYEES

Grifols actively works to prevent and mitigate the risk of adverse effects on the following human rights: right to enjoy just and favorable labor conditions, fair wages, safe and healthy working environment and right to training and development.

Non-discrimination and equal employment opportunities. Grifols has zero tolerance for any type of discrimination and aspires to foster a discrimination-free work environment, such as advertising, recruiting, hiring, training, evaluation, promotion, transfer, work assignments, accommodation requests, leave requests, compensation, benefits, disciplinary actions, layoffs, discharges, terminations, participation in company activities, programs, or events, and the integration of disabled employees.

Grifols works to foster inclusion and belonging in its corporate culture and work practices. It believes in the power of diversity - as the wellspring of collective enrichment, innovation and the development of new ideas and solutions. Grifols has various policies in place that support these commitments, including Inclusion and Belonging that comply with the laws of the countries in which it operates.

- ***Harassment-free workplace***

Grifols has no tolerance for and is committed to maintaining a workplace free from any form of unlawful discrimination, harassment, or retaliation on the basis of any protected category, a perception of association with a protected category. Grifols has policies in place to prohibit such conduct and address such incidents, if they occur, in the countries in which it operates.

- ***Occupational health and safety***

Providing a safe and healthy working environment is a top priority for Grifols. As stipulated in Grifols' Health and Safety Policy, Grifols is committed to ensuring that all employees can safely fulfill their functions in compliance with internal safety standards and applicable regulations. Grifols operates a comprehensive health and safety management system to detect job-related hazards and establish preventive measures. This system also includes occupational safety programs to eliminate, control and reduce job-related risks, health-and-safety awareness and training programs; and other initiatives to promote the well-being of Grifols employees.

- **Basic medical coverage**

Grifols is committed to promoting the health and well-being of its employees and their families. Grifols offers medical insurance to its employees.

- **Training and development**

Grifols offers continuous education and development opportunities to all employees to encourage their professional and personal growth and address skill gaps and training needs, as applicable.

- **Respect for applicable laws**

Grifols respects the various employment-related statutes in the countries in which it operates.

2. HUMAN RIGHTS IN DONATIONS

Grifols actively works to prevent and mitigate the risk of adverse effects on the following human rights: right to non-discrimination, right to health, right not to be subjected to torture, cruel, inhuman and/or degrading treatment or punishment, and right to freedom of information and decision.

- **Non-discrimination**

Grifols does not discriminate in donor selection on the basis of any protected categories, and applies the same quality and safety standards for all donors while following the regulation from all the countries where our final product is distributed.

- **Health, safety, dignity and integrity of donors**

Ensuring the health, safety, well-being, and dignity of donors is Grifols' top priority. As outlined in Grifols' Plasma Donors Policy, plasma collection via plasmapheresis is performed in highly controlled environments by professionally licensed and trained staff. The process complies with all applicable regulations and industry standards to ensure donors' health and safety, as well as the highest quality of donated plasma in benefit of patients.

Grifols only collects plasma from qualified donors who undergo medical evaluations in order to be classified as qualified donors. Grifols conducts regular physical exams in its donor centers and monitors donors' health – checking vital signs, hematocrit levels and plasma proteins, among other measures – to confirm they can safely donate plasma. Donors are informed immediately in case of abnormalities during the health check and laboratory testing.

Although donating plasma is a safe process, Grifols oversees a plasma surveillance program (Plasmavigilance) to monitor any adverse outcomes, in addition to ongoing statistical analyses to continuously improve the process. Grifols commits to regularly evaluating these metrics to guarantee donors' safety both during and after the donation process.

Grifols respects all regulations in its countries of operation regarding the frequency of donating plasma. Grifols never allows donors to exceed the maximum number of weekly and/or yearly donations and ensures donors' compliance with stipulated rest periods in between donations.

- ***Informed consent***

Grifols ensures donors provide informed consent before donating. Grifols rigorously follows all regulatory requirements in obtaining informed consent and thoroughly briefs donors on the benefits and potential risks of donating before receiving their consent.

- ***Protection of donors***

Grifols aspires to serve as a trusted information source and promotes initiatives that enhance donors' lives and their communities. As part of its intrinsic respect for human rights and human dignity, Grifols considers their ethical and financial circumstances, as well as the need to protect those from at-risk or socioeconomically disadvantaged groups.

3. HUMAN RIGHTS IN CLINICAL TRIALS

Grifols actively works to prevent and mitigate the risk of adverse effects on the following human rights: right to health, right not to be subjected to torture, cruel, inhuman and/or degrading treatment or punishment, and right to freedom of information and decision.

- ***Health, safety, dignity and integrity of clinical-trial participants***

Grifols is fully committed to respecting the human rights of participants in the clinical trials it oversees and sponsors, doing everything possible to ensure their safety, dignity and integrity.

All clinical trials follow a detailed protocol to protect the rights, life, health, safety and well-being of participants, while adhering to standards to the International Conference on Harmonisation of Technical Requirements for Registration of Pharmaceuticals for Human Use – Good Clinical Practices (ICH GCP standards); Helsinki Declaration principles on the protection of human beings; and all applicable local laws and regulations.

Clinical-trial protocols are submitted to regulatory authorities and external ethics committees. Comprised by healthcare professionals and cross-sectoral specialists, these committees verify Grifols' respect for the dignity, rights, safety and well-being of trial participants. No clinical trials are launched until approved by these entities.

- ***Informed consent***

Grifols follows a strict protocol to ensure research participants provide genuine individual informed consent, in compliance with all applicable regulatory requirements. Grifols thoroughly informs potential subjects of the trial's benefits and potential risks, resolves all doubts, and offers them sufficient time to make an informed decision on their participation. The participation of trial patients is strictly voluntary, and subjects can freely withdraw their consent at any time.

- ***Disclosure of clinical trials' results***

Grifols acknowledges the benefits of timely disclosure of clinical-trial findings for both patients and the scientific community. To this end, Grifols publicly discloses the results of all clinical trials it sponsors, regardless of their outcome. Information regarding the protocol, status and results of clinical trials is available on publicly accessible registries and platforms, including international conferences and scientific journals.

Grifols has internal ICH-GCP-aligned procedures in place to ensure the timely publication of all clinical-trial findings.

4. HUMAN RIGHTS OF PATIENTS

Grifols actively works to prevent and mitigate adverse effects on the following human rights: right to access to health, right to information and right to benefit from scientific progress.

- ***Safety and quality***

Grifols adheres to the most rigorous safety standards in its manufacturing installations to guarantee the highest quality and safety of its products. Each division has robust policies and procedures to ensure maximum levels of quality, safety and efficacy throughout the value chain, from raw materials to the sale and distribution of finished products.

Grifols works continuously to improve its quality systems and processes, which are routinely monitored by diverse quality-control committees via key performance indicators (KPIs), control markers, and compliance with good manufacturing practices (GMP).

Grifols also has pharmacovigilance and surveillance systems in place to monitor adverse reactions derived from the administration of its medicines and medical devices, respectively.

Grifols was founded on a desire to improve people's health and well-being. In alignment with its commitment to safety and quality, Grifols voluntarily withdraws product lots in the event of above-average adverse reaction rates and immediately notifies health authorities.

- ***Promoting access to medicines***

Grifols supports the principle of justice in healthcare. Grifols considers access to health care and medicines to be a global priority. As a company operating in the healthcare sector, it acknowledges its responsibility towards promoting access to medicines as both a fundamental health principle and basic human right.

Grifols commits to actively working to embed patients' access to medicines into its business practices. Grifols implements new initiatives to make its medicines more affordable and accessible, especially for patients at-risk or vulnerable populations.

For this reason, Grifols defends an approach to reflect the benefit of its medicines to patients and society at large, ensure patients have access to medicine, and make sure Grifols can continue investing in ongoing innovations. The pricing of plasma-derived medicines meets the UN criteria of supply commitment, equity and economic sustainability by ensuring that price alone does not represent a barrier to access.

Grifols supports campaigns to raise awareness on the critical need for plasma in the global healthcare system and ensure a continuous supply of this essential raw material to produce its plasma-derived medicines.

It also supports and collaborates with countries around the world to promote their self-sufficiency of plasma-derived solutions, enhance their healthcare systems, minimize their dependency on third parties and reduce the risks of shortage.

Grifols continually invests in R&D initiatives to promote advances for low-incidence diseases and leverages its innovation ecosystem to develop new value-added treatments, products and services.

- ***Prevention, detection, and elimination of counterfeit medicines***

Grifols recognizes the inherent danger to patients' health of counterfeit medicines considering their failure to comply with safety, quality, and efficiency requirements. In consequence, Grifols strictly complies with the applicable legislation on counterfeit medicines and implements necessary measures and procedures to prevent, detect and eliminate them.

Grifols has a specific policy to prevent, detect and communicate falsifications, as well as internal processes like the "track and trace" procedure to prevent counterfeiting. It also undergoes internal audits and regular inspections to ensure compliance with GMP regulations and performs due diligence on customers and distributors to verify they have the required licenses to distribute and store medicines. Grifols outlines its anti-counterfeit measures in its contracts and quality agreements with third parties.

- ***Responsible marketing***

Grifols is highly committed to marketing integrity and responsible marketing. As addressed in its Patient and Patient Organizations Policy, Grifols' promotional and educational materials strictly comply with applicable laws and regulations; align with voluntarily adopted industry policies and codes; adequately address their target audience and end users; and contain truthful, accurate, comprehensive, clear and balanced information. Grifols never asks patients or patient organizations to endorse or promote its products medicines.

5. HUMAN RIGHTS AND THE ENVIRONMENT

- ***Natural resources***

Grifols recognizes the integral connection between human rights and the environment. For this reason, it strives to promote safe, clean, healthy and sustainable ecosystems, the foundation of the rights to life, health, food, water, and sanitation, among others. Grifols spearheads various measures in this area, including actions to promote the sustainable use of resources and reduce atmospheric emissions that contribute to climate change

- ***Water consumption***

Grifols acknowledges water as a basic and finite natural resource, as well as the repercussions of its manufacturing-related water consumption, which may diminish water availability in local communities, especially in water-stressed regions. Grifols has ambitious targets and multiple processes to minimize its water consumption as part of its corporate environmental program. Grifols prioritizes efforts to decrease its water consumption in water-scarce regions.

6. THE HUMAN RIGHTS AND PRIVACY

Grifols processes the personal data of many stakeholders as part of its scientific research, talent management and interactions with donors and patients, among other initiatives. Grifols pledges to respect the privacy rights of those who entrust Grifols with their personal data, as well as comply with all relevant data-protection laws and regulations.

Grifols' global privacy and data protection policy offers a solid groundwork for the processing of personal data. Grifols also has rigorous technical and organizational security measures and insurance policies to protect organizational assets and users in a cyber-environment.

7. HUMAN RIGHTS IN THE SUPPLY CHAIN AND MODERN SLAVERY

Grifols believes in partnering with suppliers that share its respect for human rights. Grifols is also committed to taking steps to ensure that modern slavery is not taking place in any part of its supply chain or in any part of its business. In line with this Policy, Grifols expects all vendors to respect internationally recognized human rights in their business activities and on their respective supply chains. Grifols performs due diligence to prevent and mitigate negative human-rights impacts in its value chain.

Grifols unequivocally rejects any form of child, forced or compulsory labor and human trafficking. Grifols expects all suppliers and business partners to adopt the requisite measures to ensure the absence of these practices in their organizations.

CONTINUED EVALUATION OF HUMAN RIGHTS PROTECTION

Grifols' approach to implementing its commitment to respect human rights starts with an in-depth evaluation of the potential human-rights impacts deriving from its operations.

In line with the United Nations Guiding Principles on Business and Human Rights, Grifols has identified specific human rights that could be affected (either currently or potentially) because of its activities. Through this exercise, Grifols aims to prevent, mitigate and address (where applicable) negative ramifications, as well as to detect opportunities where it can advance human rights.

Following this due diligence process, Grifols has identified concrete areas where it might negatively affect human rights, both as a business in broad terms and as a biopharmaceutical organization with entity-specific features. In light of these findings, Grifols makes concerted efforts to fulfil its responsibility and address all current and potential human right impacts.

Grifols recognizes the impermanence of this process of due diligence, considering the changing nature of human rights. For this reason, it commits to conscientiously and routinely evaluating any related adverse effects.

REMEDICATION AND GRIEVANCE PROCEDURES

Grifols is committed to remediating any adverse human-rights impacts it may have caused or aggravated.

As outlined in the Code of Conduct, the Grifols Ethics Helpline is available to all employees and third parties to anonymously and confidentially report any issues or risks of non-compliance or misconduct in relation to human rights. To guarantee its successful operation, Grifols has assigned an ombudsperson to study all allegations received and ensure they are properly processed and investigated, including that appropriate measures are implemented in the event of infringement.

IMPLEMENTATION, MONITORING AND UPDATE

Grifols' Board of Directors entrusts the Sustainability Committee to monitor and ensure the compliance of this Policy, as well as its management and associated risks, under Article 3 of the Committee's regulations.

This Policy integrates the insights and expertise of external specialists. In the future, Grifols' operating procedures and functions may seek specialized external advice to ensure its proper execution, as well as to review, monitor and/or update it.

Grifols, through its office of Internal Audit, conducts regular audits of various departments and operations. As part of these audits or on an as-needed basis, Internal Audit may review and monitor compliance with this Policy, as well as any procedures derived from the same, including by identifying any appropriate enhancements to such policies and procedures or in business processes.

COMMUNICATION

It will also be internally communicated to all Grifols' employees, senior executives and members of governing bodies. Specific training on human rights and the content of this Policy will be provided to relevant business functions to ensure its understanding and correct implementation.

POLICY VALIDITY

This Policy is effective from February 25, 2022, the date of its approval by Grifols' Board of Directors.