



Grifols US Comprehensive Compliance Program

Grifols has always strived to achieve the highest standards of quality, integrity, and safety in all areas, exceeding the legal requirements and adopting and adhering to the ethical values embedded in its history and embodied by its founder.

Healthcare Compliance Program:

1. Compliance Officer and Compliance Committee

The Grifols Board of Directors is ultimately responsible for overseeing the management of Compliance at Grifols. The Chief Compliance Officer is a member of senior leadership and reports directly to the Audit Committee of the Board. US Healthcare Compliance is ultimately led by both the Chief Compliance Officer and the Chief Corporate Affairs and Legal Officer.

2. Written Standards of Conduct

Grifols has established a Code of Conduct that is publicly posted on www.grifols.com. Grifols' Code of Conduct expresses the principles of behavior that guide our company's activities. These guidelines govern the conduct of Grifols and all employees in the performance of their duties and professional relations, acting in accordance with the laws of each country where the company operates. The Code is supported by written policies and procedures and internal practices. Relevant employees are required to certify that they have read and understand Grifols' written standards.

3. Confidential Disclosure Program

Grifols Ethics Line is a confidential channel to seek help and raise concerns about possible breaches of Grifols' Code of Conduct, confidentially and without fear of retaliation. The service is accessible via web and phone and is available 24 hours a day, seven days a week. Grifols thoroughly investigates all reports it receives. Grifols has adopted a non-retaliation policy. Grifols does not tolerate retaliation of any kind, including discrimination, against anyone who reports in good faith any observed, or suspected, illegal or unethical behavior, or Code of Conduct violations. Persons who try to use retaliation will be subject to disciplinary action, up to and including termination of their contractual relationship with Grifols.

4. Compliance Training

Relevant employees receive training that covers healthcare compliance policies and procedures and the pertinent legal requirements. Employees must certify completion of all training.

5. Monitoring and Auditing

Grifols routinely self-assesses and audits Grifols' compliance with applicable laws and regulations, industry guidelines, and company policies. Grifols uses audit tools to assess and monitor compliance with its written standards, to identify areas of potential concern and to correct and prevent the recurrence of problems identified.

Interactions with Healthcare Professionals and Healthcare Organizations:

6. No Incentives to Prescribe or Use Grifols Products

No Grifols employee may offer any remuneration — that is, anything of value — to induce or encourage prescriptions or purchases of Grifols products. Nothing should be offered or provided in a manner or on conditions that would interfere with the independence of a healthcare professional's prescribing practices in accordance with the PhRMA code. Certain discounts and other price concessions may be provided in conformance with the Discount Safe Harbor to the Anti-Kickback Statute.

7. Educational Grants

Grifols provides grants to fund educational activities that foster increased understanding of scientific, clinical, or health care issues that contribute to the improvement of patient care. Grants may not be solicited or provided to encourage recipients to prescribe, purchase, order, or recommend Grifols products or provided in place of a product discount. Grifols provides financial support for educational programs in accordance with U.S. state and federal law and industry guidelines.

8. Research and Clinical Study Support

Grifols only supports research and clinical studies that promote legitimate research goals and are conducted pursuant to a written agreement. Support for such studies cannot be provided with the intent to induce or encourage the entity receiving the support to prescribe, purchase or order Grifols products.

9. Consulting with Healthcare Professionals

Grifols complies with the PhRMA Code on Interactions with Healthcare Professionals. Grifols may engage healthcare professionals as consultants or advisors to furnish important and needed information to Grifols, if it selects such consultants based on their relevant qualifications, experience, and expertise and pays them fair market value for their legitimate services, pursuant to written contracts.

Grifols has a \$1,500 annual dollar limit on promotional materials, business meals and items or activities that it may provide to an individual healthcare professional practicing in the state of California.

Corrective Action Procedures

10. Discipline

Violations of Grifols' healthcare compliance policies and procedures subject employees to disciplinary action. Employees who fail to comply with these policies, or who negligently or willfully fail to detect and report violations of these policies, will be subject to a variety of actions, up to and including termination.