GRIFOLS

PATIENT AND PATIENT ORGANIZATIONS POLICY

INTRODUCTION

Over the years, the healthcare landscape has evolved to become increasingly more responsive to the needs and decisions of patients. The patient voice is now the leading voice in healthcare decision-making, along with the health care provider.

By integrating the insights, expertise and feedback from patients and patient organizations ("**POs**")[1], Grifols has been able to develop and design increasingly innovative and personalized treatments, diagnostics, technologies, services and solutions. Aligning with and responding to the growing importance of the patient voice has become a top priority for Grifols.

Grifols has always been committed to improving the health and well-being of people around the world since its origins. Patients are at the heart of Grifols' activity, inspiring its commitment to the highest safety, quality and efficacy standards at every stage of production and distribution.

In reflection of this dedication, Grifols works closely with POs to help them advance their missions, promoting ongoing initiatives to engage, educate and support patients around the world. Grifols recognizes the experience and commitment of POs, and thus the value of dialogue locally and globally. These collaborations respect applicable principles of independence and transparency as well as country-specific regulations.

Grifols aims to serve as a reliable and credible source of information for both patients and POs, offering them educational support and information on the origin of the starting material on which their treatment depends, the complex and lengthy production process and the numerous ways that plasma therapies differ from traditional pharmaceutical products.

PURPOSE

This Patient and Patient Organizations Policy (the **"Policy"**) offers a set of principles that underpin our approach to engagement with patients and patient organizations.

SCOPE

This Policy applies to all employees of Grifols, S.A. and its subsidiaries and affiliated companies (**"Grifols**") to guide their relations with patients and POs.

This Policy covers: (i) interactions with POs; (ii) interactions with individual patients (when legally possible) and caregivers; (iii) Grifols initiated programs intended to provide services related to improving patient or healthcare outcomes, or to ensure or assist with access and/or reimbursement (e.g., patient support programs, patient assistance programs and patient

[1] Patient Organization or Patients Groups (POs) are defined as not-for-profit institution that primarily represents the interests and needs of patients, their families and/or caregivers. POs may be comprised of volunteers and/or professional staff; they may or may not be formally constituted entities. POs may focus on broad or narrow disease states and may engage in a variety of activities including, but not limited to, disease and treatment education, pre and post-diagnosis support and counseling, advocacy, funding of medical research, and partnering with sponsors in R&D to bring the patient perspective to the development of new medicines. POs may be described as patient organizations, patient advocacy groups, or healthcare consumer organizations depending on the country/region.

programs); (iii) interactions carried out by Grifols directly with POs and interactions conducted by agencies, consultants and other third-parties with such POs acting on behalf of Grifols.

Please note that certain countries do not allow the industry to interact with patients directly. Therefore, in such countries, Grifols does not directly perform any kind of activity with patients. Please contact Corporate Affairs with any questions.

PRINCIPLES

Grifols' mission to improve the health and well-being of patients drives the research, development and production of essential medicines, hospital pharmacy solutions and diagnostic systems. All of its interactions with patients (when legally possible) and POs reflect the principles of clarity of purpose; independence; privacy; written agreement; transparency and integrity.

As part of this transparency, Grifols ensures all interactions are supported by clearly articulated motivations and intended outcomes that are communicated in straightforward, easy-to-understand language.

Grifols' interactions with patients (when legally possible) and POs never aim to collect confidential information from patients without consent and/or competitors. Patient interactions on specific services are never intended to promote the use of Grifols' products.

The most relevant principle for Grifols' interactions with patients (when legally possible) and POs is a deep-rooted respect for human rights, as outlined in Grifols' Human Rights Policy. This commitment is also reflected in diverse globally recognized regulations, all of them assumed by Grifols, as the United Nations International Bill of Human Rights – including 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 Helsinki Declaration, and the Universal Declaration on Bioethics and Human Rights of the United Nations Educational, Scientific and Cultural Organization (UNESCO).

It is also reflected in other international frameworks, such as the United Nations Guiding Principles of Business and Human Rights, the Guidelines for Multinational Enterprises of the Organization for Economic Cooperation and Development (OECD) and the United Nations Global Impact.

COMMITMENTS TO PATIENTS AND PATIENT ORGANIZATIONS

Building on principles explained above, Grifols' core commitments to patients and POs are as follows:

1. **Product safety, quality and effectiveness**: Promote the highest standards of safety and quality and offer patients the best therapies, products and services possible through continuous innovation.

2. **Access to medicines**: Promote and support the principle of justice and equity in health, with special focus on access to plasma therapies, including:

a) Pricing of products is mainly based on the cost-benefit principle while ensuring Grifols' economic sustainability.
b) Educational campaigns to raise awareness on the vital role of plasma and plasma-based solutions.
c) Efforts to help countries reach plasma self-sufficiency and reduce barriers of access to plasma-derived medicines.
d) Sustained investments to guarantee and diversify Grifols' plasma supply and manufacturing enhancements to expand the production of essential plasma therapies.

3. **Transparency and independence**: Engage and support patients and POs while also serving as a reliable and transparent source of information.

PATIENTS

1. PRODUCT SAFETY, QUALITY AND EFECTIVENESS

- ***Patient health is Grifols' most important objective***

Grifols adheres to the most rigorous safety standards in its manufacturing premises 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.

Grifols' commitment to safety is also ratified in its Code of Ethics, applicable to senior executives, and Code of Conduct, extensive to the entire organization.

2. ACCESS TO MEDICINES

- ***Access to health care and medicines is a global priority***

Grifols affirms the principles of justice and equity in healthcare. Grifols considers access to health care and medicines to be a global priority and acknowledges its responsibility to support access to medicines as both a fundamental health principle and basic human right.

To this end, Grifols supports programs aimed at enabling access to treatment.

This commitment is reflected in four main areas:

- Price-setting model
- Educational and awareness campaigns
- Plasma self-sufficiency
- Sustained investments to help meet the world's need for plasma-derived therapies

- ***Price-setting model***

The pricing of medicines meets the criteria of supply commitments, equity and economic sustainability. Through pricing strategies Grifols works to prevent product pricing from being a barrier to access.

Grifols defends an approach to reflect the benefit of its products to patients and society at large, promote patient access to medicine, and make sure Grifols can continue investing in ongoing innovations.

Grifols considers a range of variables when determining a product's price. These include availability of other treatments, a product's potential to reduce other healthcare costs such as hospital stays, affordability and other factors.

Grifols also considers its investments to support its long-term sustainable strategy, promoting the quality, safety, and reliability of its medicines and solutions, and ability to enhance patients' health through continuous innovation.

Medicines are often initially approved for specific indications. Following initial approval, Grifols sometimes continues to analyze the product to improve it or discover additional indications so other patients can benefit. Grifols might modify the product's price to reflect new uses or formulations discovered in subsequent research. External marketplace factors like availability of new or biosimilar solutions may also affect price.

The price patients pay for Grifols' products is ultimately set by their healthcare providers, insurers and country-specific context.

- ***Self-sufficiency***

Grifols promotes the availability of plasma therapies to reduce barriers of access to plasma-based medicines. Among its initiatives, it supports and collaborates with countries around the world to bolster their levels of self-sufficiency and improve their healthcare systems, seeking to reduce their dependency on third parties and minimize risks of shortage.

- ***Sustained investments***

The production of plasma-derived medicines is a complex and highly regulated process that takes nine to twelve months to complete. As a result, measures to increase product availability is a gradual process that entails expanding the supply of plasma, laboratory facilities and productive capacities.

Grifols is an industry leader in strategic investments aimed at increasing its plasma supply and optimizing its production installations, including its state-of-the-art fractionation and purification plants. Through these investments, Grifols is able to continually deliver value to patients, healthcare professionals and hospitals.

In reflection of its commitment to patients, Grifols is committed to continually investing in R&D initiatives targeting low-prevalence diseases, e.g. rare diseases and neglected tropical diseases, and leveraging 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.

- ***Reliable information***

  Grifols respects patient autonomy by acknowledging their right and ability to make decisions regarding their healthcare. Grifols strives to serve as a transparent and reliable source of information to patients.

- ***Responsible marketing in all promotional and educational materials***

  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 to endorse or promote its products or medicines.

PATIENT ORGANIZATIONS

3. TRANSPARENCY & INDEPENDENCE

- ***Reliable information***

  Grifols partners with POs to help advance their missions, raise disease awareness and support a wide range of initiatives designed to engage and educate patients and facilitate access to treatment, with no commercial aim. Grifols strives to serve as a transparent and reliable source of information for POs.

  Grifols also works closely with POs to maximize their impact on patient communities, with a focus on four key pillars: educate, advocate, engage and support.

- ***Independent and transparent collaboration***

  Grifols' collaborations with POs always respect applicable principles of independence and transparency as well as country-specific laws, regulations and codes of ethics of local industry associations in such country. Grifols follows standard operating procedures to define the eligibility, compliance and transparency of the collaboration agreements, contributions and donations provided to POs.

  Grifols also respects the independence of POs by never making its support conditional on serving as their sole source of funding or exercising undue influence on the POs' initiatives, projects or focus areas. Grifols publicly discloses its financial support of patient advocacy groups (PAGs).

  All agreements between Grifols and a POs should therefore be in writing, properly documented and lay out the purpose and the desired outcome of the support provided.

  Such collaborations must be in compliance with the law and any other applicable rules including transparency and reporting rules where applicable.

- ***Integrity and Trust***

  Any communication coming out of a Grifols/POs need to be neutral in tone, clear, accurate, balanced and fair. Any interaction will be based on mutual trust. All collaborations should have a legitimate need, including a clearly identified patient benefit, and should never be used to induce or encourage the use of Grifols' products or services, nor to seek confidential information. Grifols never asks POs to endorse or promote its products or medicines.

- ***Educational and awareness campaigns***

  Grifols engages in educational and awareness campaigns to increase public knowledge about and access to rare diseases and their treatments. As a company whose major area of focus is rare and chronic illness, Grifols works with PO's to advance the diagnosis and treatment of relevant rare and chronic conditions for which it provides medicines.

  Plasma donation is vital to saving and enhancing patients' lives. Plasma cannot be created in a laboratory or produced synthetically. Due to the generosity of donors, plasma can be collected and transformed into life-sustaining therapies to treat a wide diversity of conditions and diseases. In the case of rare diseases and chronic conditions, plasma-based medicines are may be the only available treatment option.

  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.

- ***Equivalence***

  Any support to a PO will be commensurate to the intended goal and should be fair market value.

COMMUNICATION AND REPORTING CHANNELS

Grifols has open lines for ongoing communications with patients (when legally possible) and POs, including periodic calls with POs to address areas of mutual interest or concern.

In parallel, Grifols' divisions have a complaints system to record and assess all notifications received from healthcare centers, patients or users regarding possible product-quality defects.

Each division has a product recall and withdrawal system with rigorous procedures to notify healthcare authorities, patient associations, patients and healthcare professionals on any potential risks associated with a withdrawn or recalled product. Grifols also has a customer service call center and online platforms dedicated to responding to questions and inquiries related to product safety, tolerability or efficacy serving as a further testament to its commitment to transparency.

IMPLEMENTATION, MONITORING AND UPDATE

Grifols' Board of Directors entrusts the monitoring and compliance of this Policy and its associated risks and management to the Sustainability Committee under Article 3 of this committee's regulations.

Further, 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.

POLICY VALIDITY

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