

## GRIFOLS ETHICS LINE POLICY

1. INTRODUCTION.....	2
2. PURPOSE .....	2
3. SCOPE .....	2
3.1. Who Is Covered Under the Policy?.....	2
3.2. Which Concerns Should Be Reported? .....	2
3.3. Which Concerns Should Not Be Reported?.....	3
4. PROTECTION FOR WHISTLEBLOWERS.....	3
4.1. Protecting the Whistleblower's Identity .....	3
4.2. Protecting Whistleblowers from Retaliation .....	3
5. PROTECTION OF INVESTIGATED PERSONS.....	4
6. REPORTING PROCESS .....	4
6.1. Raising Concerns.....	4
6.2. Assignment of the Case .....	5
6.3. Investigation.....	5
6.4. Remediation and Action Taken .....	6
6.5. Local Requirements .....	6
7. OTHER INTERNAL REPORTING CHANNELS.....	6
8. EXTERNAL REPORTING CHANNELS.....	6
9. POLICY VALIDITY .....	6
APPENDIX A. LOCAL REPORTING CHANNEL AND OMBUDSPERSON .....	7
APPENDIX B. LOCAL REQUIREMENTS.....	8
APPENDIX C. EXTERNAL REPORTING CHANNELS.....	10

# GRIFOLS

## 1. INTRODUCTION

Grifols is firmly committed to maintaining the highest standards of business ethics and conduct, therefore, strives to encourage a culture in which employees and external stakeholders feel comfortable communicating any question or concern they may have about the Grifols' conduct or practices without fear of retaliation.

Grifols has established the Grifols Ethics Line, a formal communication channel, to provide a safe and confidential mechanism to raise concerns and to ensure that any matter reported is treated seriously, appropriately and fairly, and investigated in a manner that protects the rights of all individuals involved in the investigation.

The Board of Directors has appointed the Chief Internal Audit as the person responsible for the Grifols Ethics Line (the "Global Ombudsperson").

## 2. PURPOSE

The Grifols Ethics Line Policy (the "Policy") sets out Grifols' approach to protecting whistleblowers with the aim of encouraging and supporting individuals to report concerns in good faith. It also provides guidance on how to raise concerns about misconduct, illegal activities or unethical behavior, and the process for reporting, investigating and remedying that will be followed when a concern is raised.

## 3. SCOPE

### 3.1. Who Is Covered Under the Policy?

The Policy applies to all employees (current and former), volunteers, trainees, applicants, officers and directors, contractors (and their subcontractors), suppliers, customers, and any other stakeholders of Grifols S.A., its affiliates, and of any company managed, directed, or operated, directly or indirectly, by Grifols S.A. ("Grifols").

### 3.2. Which Concerns Should Be Reported?

This Policy covers the reporting of questions and concerns about applicable laws, rules and regulations, the Grifols' Code of Conduct and other internal policies and procedures, or about their potential violation. Examples of reportable concerns include but are not limited to:

- business integrity breaches, such as bribery and corruption, anti-competitive behavior, insider trading or market abuse, fraud, money laundering, theft or improper use of company property or funds, etc.;
- undeclared or mismanaged conflicts of interest;
- human rights violations, including discrimination, workplace or sexual harassment;
- financial irregularities;
- data privacy violations;
- unsafe work practices and other significant safety and health concerns, or causing damage to the environment;
- retaliation against a whistleblower; and
- any other conduct which is unethical, in breach of our Code of Conduct, policies or procedures, or illegal or unlawful.

### 3.3. Which Concerns Should Not Be Reported?

Whenever you suspect misconduct or wrongdoing, Grifols encourages you to report it. However, you should not use the Grifols Ethics Line to make false accusations or to spread unfounded rumors. False allegations made knowingly that are false or misleading will not be tolerated, and may result in disciplinary action, including dismissal. False allegations may also trigger legal consequences for the individual who reported them.

Whistleblowers shall refrain from providing personal data that reveal ethnic or racial origin, political opinions, religious or philosophical beliefs, union membership, as well as biometric data, health-related data, or data related to the sexual life or sexual orientation of any of the individuals involved in the reported concern, unless such information is indispensable to understand the scope of the communication.

Additionally, the following concerns should not be reported through the Grifols Ethics Line:

- Emergencies or situations that pose an immediate threat to personal safety or property. Local authorities shall be directly notified in such case.
- Adverse reactions or any other drug-related problems. These incidents must be reported through the specific pharmacovigilance communication channel provided by Grifols.
- Donors' questions or complaints related to the care received during the donation. These incidents must be reported to the specific donor's support channels.

## 4. PROTECTION FOR WHISTLEBLOWERS

Grifols recognizes that whistleblowers are vulnerable to retaliation or victimization and is committed to protecting the confidentiality and anonymity of whistleblowers as far as possible, even if the reported concern or disclosure turns to be unfounded.

### 4.1. Protecting the Whistleblower's Identity

Any individual can ask a question or report a concern anonymously using the Grifols Ethics Line. However, Grifols encourages all individuals to identify themselves and to give as much detail as possible, so the allegation can be investigated appropriately. In any case, if the whistleblower discloses his/her identity, Grifols is committed to ensure that it will be treated with the necessary confidentiality without his/her identity being disclosed to third parties, and in accordance with local data protection requirements and the [Privacy Notice](#).

The Grifols Ethics Line has adequate technical and organizational measures to preserve the identity and to ensure the confidentiality of the data corresponding to the affected individuals and any third party mentioned in the information provided, especially the identity of the whistleblower if it has been identified.

Grifols may, however, reveal the whistleblower's identity or any information that could lead to their identification to a regulatory body or authority if required by law.

### 4.2. Protecting Whistleblowers from Retaliation

Grifols will not tolerate retaliation of any kind, direct or indirect, against those who report a concern in good faith.

Retaliation refers to any direct or indirect action or omission, occurring in a work-related context, that causes or may cause unjustified harm or detriment to the worker as a result of making a report. Retaliation includes, but is not limited to: (i) suspension, termination, or demotion; (ii) damages, including reputational harm or economic losses, coercion, intimidation, harassment, or ostracism; (iii)

negative evaluations or references regarding job or professional performance; (iv) inclusion on blacklists or dissemination of information in a certain sector that hinders or prevents access to employment or contracting of works or services; (v) denial or annulment of a license or permit; (vi) denial of training; (vii) harassment, discrimination or unfair treatment.

Any individual who experiences, or is threatened with, retaliation as a result of reporting a concern, considered reporting a concern, or because cooperated with the investigation of a concern, will be protected from retaliation as required by this Policy and by applicable laws.

Individuals who engage in retaliation may be subjected to severe consequences both internal and external, in accordance with relevant laws and regulations. Grifols will take disciplinary action, up to and including termination, against any individual found to be involved in retaliation. The protection also covers to individuals who report potential violations through external channels to the competent authorities.

Additionally, the protection against retaliation will be extended to co-workers, family members, or any other individual who assists the whistleblower, to legal entities owned by the whistleblower, for whom the whistleblower works or with whom the whistleblower maintains any other type of relationship in a work context, as well as to all individuals established by applicable legislation.

## 5. PROTECTION OF INVESTIGATED PERSONS

Grifols will ensure that individuals under investigation are granted the following rights:

- The right to an effective remedy and to a fair trial;
- the right to the presumption of innocence;
- the right to preserve their identity and the confidentiality of the facts being investigated; and
- the right to defense, including the right to be heard and to access their file. Access to the file will be limited to information that does not allow the whistleblower to be identified, and it will take place at a time and in a manner deemed appropriate to ensure the successful completion of the investigation.

## 6. REPORTING PROCESS

### 6.1. Raising Concerns

The Grifols Ethics Line allows employees and external stakeholders to raise concerns about ethical issues, or report any conduct believed to be a potential violation of applicable laws, rules and regulations, or Grifols policies and procedures, confidentially with the possibility to report anonymously.

The Grifols Ethics Line is an independent, anonymous (if so requested) and secure whistleblower service delivered by Navex Global, Inc. (NAVEX). The service is available 24 hours a day, 7 days a week, in 16 languages, either online or via telephone:

- **Online:** access via <http://grifols.ethicspoint.com>
- **Telephone:** A NAVEX contact center specialist will answer the call and ensure that all necessary information is gathered, and that the conversation is documented in writing in a detailed record after the whistleblowers give their consent. The operator will offer the opportunity to check, rectify and accept the minutes of the conversation, by signing them. Operators can receive complaints in any of the languages available for reporting, which are listed in the header of the web platform. International toll-free service numbers are available at <http://grifols.ethicspoint.com>

When mandated by law, a local reporting channel will enable whistleblowers to have their reports locally managed, if they so choose. For comprehensive information on the local reporting channel and the designated Local Ombudsperson, please consult Appendix A.

Whistleblowers may also request a face-to-face meeting with the Global Ombudsperson and/or Local Ombudsperson to express their concerns, that will be held within a maximum period of 7 days. The meeting will be documented, subject to the whistleblower's consent, by recording or in writing in a detailed record. In the latter case, the whistleblower will be given the opportunity to verify, rectify and accept the minutes of the meeting by signing them. To schedule a meeting, whistleblowers should contact the Global Ombudsperson: Ignacio Ramal (Chief Internal Audit), by email to: [ignacio.ramal@grifols.com](mailto:ignacio.ramal@grifols.com) or by phone +34670923153. Alternatively, whistleblowers can reach out to the Local Ombudsperson (contact information provided in Appendix A).

## 6.2. Assignment of the Case

Concerns received through the Grifols Ethics Line are routed to the Global Ombudsperson and/or Local Ombudsperson, as the case may be in accordance with Appendix A, who will assign the concern to the appropriate internal subject matter expert (case manager) for review, investigation and response, in accordance with the assignment matrix included in the internal investigation standard operating procedure, considering the location and nature of the allegation. An acknowledgement of receipt will be sent within 7 calendar days of that receipt.

All investigations are assigned to personnel who are appropriately trained and independent of the area in which the concern arose, ensuring impartiality and confidentiality of the investigations.

If the allegation involves the Global Ombudsperson, NAVEX will automatically route it to the Audit Committee of the Board of Directors of Grifols S.A. For allegations involving the Local Ombudsperson, NAVEX will automatically route it to the Global Ombudsperson.

## 6.3. Investigation

All allegations are responded to in a timely manner and investigated thoroughly to ensure appropriate actions are taken.

While the steps to be followed in an investigation may vary depending on the specific circumstances of each case, all investigations will:

- be investigated with impartiality and without bias or prejudice towards the person who reports the concern, or any other individuals involved;
- be conducted preserving the confidentiality of all parties involved, including the whistleblower and the persons investigated;
- follow a fair process, ensuring that the persons investigated have the right to an effective remedy and to a fair trial, as well as the presumption of innocence and the right of defense, including the right to be heard and the right to access the file;
- adhere to the Grifols non-retaliation policy; and
- determine whether there is enough evidence to substantiate the concerns reported.

The timeframe to conduct the investigation and to provide feedback to the whistleblower should not exceed 3 months from the acknowledgement of receipt. Although Grifols intends to promptly handle and investigate all questions and concerns received, recognizes that certain factors, such as the complexity of the issue reported, may require a longer period for completion, thus, in cases of exceptional complexity, this deadline may be extended for a maximum of an additional 3 months.

# GRIFOLS

The Grifols Ethics Line allows the possibility of maintaining communication with the whistleblower at any time, and if deemed necessary, requesting additional information.

## **6.4. Remediation and Action Taken**

After the investigation is completed, the case manager will provide feedback to the whistleblower ensuring the rights of both the whistleblower and the investigated person are duly respected.

The outcome of the investigation may be disclosed to the authorities, such as law enforcement agencies or prosecutors, as required by law, or if the reported misconducts could potentially constitute evidence of a crime.

## **6.5. Local Requirements**

As some local regulations impose specific requirements which imply additional restrictions or conditions, local specifications for each jurisdiction are set forth in Appendix B to verify any local legal requirements that need to be considered.

## **7. OTHER INTERNAL REPORTING CHANNELS**

Grifols also offers the option to whistleblowers to raise concerns directly to their manager, Human Resources, Legal Department/Advisors, Internal Audit, Compliance, and/or to the Local Supervisory Body, where exists (e.g., Organismo di Vigilanza).

Allegations received through channels other than the Grifols Ethics Line must be treated with confidentiality and immediately referred to the Ombudsperson, except for concerns reported to Human Resources and Legal in North America, which are addressed via their designated reporting channels.

## **8. EXTERNAL REPORTING CHANNELS**

Some EU countries have designated public authorities to receive reports concerning unlawful behaviors. These external channels offer comparable safeguards to Grifols Ethics Line, particularly regarding confidentiality and protection against retaliation.

For comprehensive information on the local authorities managing the external reporting channels, please consult Appendix C.

## **9. POLICY VALIDITY**

This Policy is effective from December 18, 2023, date of approval by Grifols' Board of Directors.

## APPENDIX A. LOCAL REPORTING CHANNEL AND OMBUDSPERSON

Company	Country	Reporting Channel	Local Ombudsperson
Haema, AG	Germany	NAVEX Germany	<b>Martina Schenk</b> (Senior Expert Regulatory Affairs/ QA-Plasmasupport) +491752754895 <a href="mailto:martina.schenk@haema.de">martina.schenk@haema.de</a>
Grifols Deutschland GmbH	Germany	NAVEX Germany	<b>Alper Demirci</b> (Manager Corporate Compliance) +49 15209296639 <a href="mailto:alper.demirci@grifols.com">alper.demirci@grifols.com</a>
Plasmavita Healthcare GmbH	Germany	NAVEX Germany	<b>Susan Haendel</b> (Manager Human Resources) <a href="mailto:s.haendel@plasmavita.de">s.haendel@plasmavita.de</a>
Grifols Worldwide Operations Ltd.	Ireland	NAVEX Ireland	<b>Lydia O'Donnell</b> (Manager Human Resources) +353 873858834 <a href="mailto:lydia.odonnell@grifols.com">lydia.odonnell@grifols.com</a>
Grifols Italia S.p.A.	Italy	NAVEX Italy	<b>Mariangela Vergnano</b> (Manager Corporate Compliance) +393783014726 <a href="mailto:mariangela.vergnano@grifols.com">mariangela.vergnano@grifols.com</a>
Grifols France SARL	France	NAVEX France	<b>Catherina Njem</b> (Manager Corporate Compliance) +33645951295 <a href="mailto:catherina.njem@grifols.com">catherina.njem@grifols.com</a>

## APPENDIX B. LOCAL REQUIREMENTS

### Austria

The timeframe to conduct the investigation and to provide feedback to the whistleblower should not exceed 3 months from the acknowledgement of receipt. Therefore, there should be no additional extended period of 3 months.

### Czech Republic

The timeframe to conduct the investigation and to provide feedback to the whistleblower should not exceed 30 days from the acknowledgement of receipt. In cases of exceptional complexity, this deadline may be extended, but not more than twice, for a maximum of an additional 30 days each. The Ombudsperson will inform the whistleblower in writing of the extension of the deadline and the reasons for it before the expiry of the deadline.

### France

The timeframe to conduct the investigation and to provide feedback to the whistleblower should not exceed 3 months from the acknowledgement of receipt. Therefore, there should be no additional extended period of 3 months. Although a period of 3 months is provided for feedback to the whistleblower, disciplinary sanctions cannot be taken after a period of 2 months from the receipt of the disclosure.

### Germany

In addition to the terms of this Policy, the provisions of the German Whistleblower Protection Act apply.

It is clarified that, in Germany, the points listed under Clause 3.3 of the Policy can be reported through the Grifols Ethics Helpline.

The timeframe to conduct the investigation and to provide feedback to the whistleblower must not exceed 3 months from the acknowledgement of receipt and there must not be additional periods. The information to be reported back to the whistleblower shall include the notification of planned follow-up measures and those already taken, as well as the reasons for such measures.

### Hungary

The timeframe to conduct the investigation and to provide feedback to the whistleblower is 30 days, which might be extended in justified cases, but it cannot exceed 3 months. The whistleblower must be notified of the extension of the deadline and the reason for it, as well as the expected date of the end of the investigation.

### Ireland

The timeframe to conduct the investigation and to provide feedback to the whistleblower should be within a reasonable period and not exceed 3 months from the acknowledgement of receipt and, if requested in writing, at 3-month intervals until the procedure triggered by the report is closed.

In those circumstances where confidentiality cannot be maintained, including in a situation where it may be necessary to disclose a whistleblower's identity for the purposes of the receipt or transmission of, or follow-up on, reports, the whistleblower should be notified in writing with reasons before their identity or the information is disclosed.



If the concern is reported locally through the local reporting channel and designated person provided for under Appendix B, that designated person will carry out an initial assessment to determine whether there is prima facie evidence that a relevant wrongdoing may have occurred and if, after the initial assessment, the designated person decides that there is no prima facie evidence that a relevant wrongdoing may have occurred: (i) they may close the procedure or refer the matter to another applicable procedure e.g. the grievance procedure; and (ii) they will notify the whistleblower, in writing, as soon as practicable of the decision and the reasons for it.

## **Italy**

In the event that the deadline of 3 months to terminate the investigation is to be extended for an additional term of 3 months, the whistleblower will be notified before the expiry of the first 3 months period.

Allegations received through channels other than the Grifols Ethics Line must be referred to the Ombudsperson within 7 days of their receipt, with simultaneous notification of transmission to the whistleblower.

## APPENDIX C. EXTERNAL REPORTING CHANNELS

Country	Reporting Channels / Authorities
Austria	<ul style="list-style-type: none"> <li>Federal Bureau of Anti-Corruption</li> <li>The Federal Competition Authority for competition law infringements</li> <li>The Financial Market Authority for violation of regulatory laws</li> <li>The Money Laundering Reporting Office for violations of anti-money laundering rules</li> </ul>
Czech Republic	The Ministry of Justice of the Czech Republic
France	The list of external authorities designated to receive disclosures has been provided in the Annex of the Decree no. 2022-1284 of October 3, 2022 - sector and area of expertise
Germany	<ul style="list-style-type: none"> <li>Federal Office of Justice</li> <li>Federal Financial Supervisory Authority</li> <li>Federal Cartel Office</li> </ul>
Hungary	The list of external authorities has been provided in the Act XXV of 2023 and Government Decree No. 225/2023. (VI. 8.)
Ireland	Office of the Protected Disclosures Commissioner who will receive and redirect the report to the appropriate competent authority or if applicable, to a prescribed person listed in Protected Disclosures Act 2014 (Disclosure to Prescribed Persons) Order 2020
Italy	Italian Anticorruption Authority (ANAC)
Portugal	The National Anti-Corruption Mechanism, as provided for in article 12.º/3 of the Law no 93/2021, 20th December
Poland	No local external reporting channel is established yet
Spain	<ul style="list-style-type: none"> <li>Autoridad Independiente de Protección del Informante, as well as, any other competent regional authority, including, without limitation, the Anti-Fraud Office of Catalonia</li> <li>Comisión Nacional de los Mercados y la Competencia (CNMC)</li> <li>Comisión Nacional de los Mercados de Valores (CNMV)</li> <li>Servicio Ejecutivo de la Comisión de Prevención del Blanqueo de Capitales e Infracciones Monetarias (Sepblac)</li> </ul>
Sweden	<p>Several Swedish authorities have been assigned by the Swedish Government to set up external reporting channels. These authorities shall be able to receive, follow up, and provide feedback within their respective field of responsibility, including, without limitation:</p> <ul style="list-style-type: none"> <li>Swedish Public Health Authority (Folkhälsomyndigheten)</li> <li>Swedish Competition Authority (Konkurrensverket)</li> <li>Swedish Financial Supervisory Authority (Finansinspektionen)</li> <li>Swedish Economic Crime Authority (Ekobrottsmyndigheten)</li> <li>Swedish Medical Products Agency (Läkemedelsverket)</li> </ul>