



# **HUMAN RIGHTS DUE DILIGENCE REPORT 2023**

**GRIFOLS**

# ABOUT THIS REPORT

Grifols adheres to the Universal Declaration of Human Rights (1948), the Declaration of Helsinki (1964), and UNESCO Universal Declaration of Bioethics and human Rights (2005). Integrating the insights and expertise of external specialists and supervised by Grifols' Sustainability Committee, Grifols has conducted a human rights due diligence process to give answer to these pledges and enhance its transparency and accountability. This document presents a comprehensive analysis of the company's efforts to assess and address the significant adverse impacts, both real and potential, directly associated with its core activities, products, services, and business relationships.

The scope of this project extends through the year 2023, following the due diligence process conducted in 2022 on Grifols' Group (hereinafter Grifols).

The analysis adheres to the following guidelines and frameworks:

- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct framework
- OECD Due Diligence Guidance on Responsible Business Conduct
- UN Guiding Principles on Business and Human Rights
- Human Rights Impact Assessment of the Danish Institute for Human Rights
- The 2030 Agenda for Sustainable Development

In alignment with these frameworks, Grifols has:

1. Considered not only the geographies where Grifols is most active but also those regions where the risk of human rights violations is inherently greater. This approach aligns with the OECD's recommendations and serves to enhance the company's commitment to responsible business practices.
2. Assessed the adverse impacts of Grifols on the rightsholders across the entire value chain of the company, including tier I suppliers, joint ventures, and others. Our focus extends to the most vulnerable groups including the company's employees, third-party employees, local communities, and other relevant rightsholders.
3. Identified mitigation and remediation measures related to the adverse impacts on human rights to understand Grifols' ability to address and avoid those risks and support the disclosure of how they are managed.

This report is a testament to Grifols' dedication to transparency, ethical conduct, and the protection of human rights. It serves as a tool for stakeholders to gain insights into the company's commitment to addressing challenges and promoting positive change within its sphere of influence. This report has been approved by Grifols' Board of Directors.

We invite you to explore the findings presented in this report, which reflect Grifols' ongoing journey towards ensuring respect for human rights throughout its operations.



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# INTRODUCTION

Grifols is a leading global healthcare company that develops plasma-derived medicines and other innovative biopharmaceutical solutions that improve the health and lives of millions of patients around the world.

Since our founding in 1909, we have applied our ever-growing mastery of plasma, life sciences ethical leadership and industry-leading quality and safety standards to contribute to a healthier and more sustainable society.

Respect for Human Rights is the unshakable foundation of a more equal and sustainable society. For this reason, businesses through an ethical management of its daily operations and its entire value chain are key actors to forge an environment of trust and responsibility to achieve that goal.

In this context, the **United Nations Guiding Principles on Business and Human Rights**<sup>1</sup> set the expectation that businesses conduct a human right due diligence. This includes assessing and responding to any actual and potential human rights impacts that might arise from or be directly linked to their activities.

The **OECD Guidelines for Multinational Enterprises**<sup>2</sup> which is fully aligned with and is complementary to the UN Guiding Principles on Business and Human Rights and the **ILO Tripartite Declaration**<sup>3</sup>, state that businesses should respect human rights and conduct a human right due diligence by embedding responsible business conduct into policy and management systems; identify and assess human rights impacts in their operations, supply chains and business relationships; cease, prevent or mitigate human rights adverse impacts; track implementation and results; provide for or cooperate in remediation when a human right is vulnerated; communicate how human rights impacts are addressed; and have a policy commitment to respect human rights.

The **2030 Agenda for Sustainable Development**<sup>4</sup> and its Sustainable Development Goals (SDGs) recognize that business activity, investment and innovation are major drivers of productivity, inclusive economic growth, and job creation. Additionally, the respect of human rights in business activities is inherent to many SDGs.

<sup>1</sup> [https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinessshr\\_en.pdf](https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinessshr_en.pdf)

<sup>2</sup> <https://www.oecd.org/corporate/mne/>

<sup>3</sup> <https://www.ilo.org/empent/areas/mne-declaration/lang--en/index.htm>

<sup>4</sup> <https://sdgs.un.org/2030agenda>

# OUR HUMAN RIGHTS COMMITMENT

Respect for dignity and human rights underpin all Grifols' activities in alignment with the core principles of the Universal Declaration of Human Rights (1948)<sup>5</sup>, Declaration of Helsinki (1964)<sup>6</sup>, and UNESCO Universal Declaration of Bioethics and Human Rights (2005)<sup>7</sup>. Therefore, we are highly committed to respecting human rights throughout our operations and value chains as defined by the UN Guiding Principles on Business and Human Rights.

Support and respect for fundamental human rights is reflected in Grifols' corporate strategy and the Grifols Code of Conduct, Human Rights Policy, Sustainability Policy, Diversity and Inclusion Policy, and Policy on Directors Diversity, among others, all being embedded throughout Grifols' culture. Please refer to our Human Rights Policy [here](#).

This Human Rights Report is the result of an exhaustive due diligence process that Grifols has been carrying out during 2022 and 2023 in order to face its responsibility to respect human rights according to the UN Guiding Principles on Business and Human Rights.

<sup>5</sup> <https://www.un.org/en/about-us/universal-declaration-of-human-rights>

<sup>6</sup> [https://inside.tamuc.edu/research/compliance/IRB-Protection\\_of\\_Human\\_Subjects/irbDocuments/Declaration.of.Helsinki.pdf](https://inside.tamuc.edu/research/compliance/IRB-Protection_of_Human_Subjects/irbDocuments/Declaration.of.Helsinki.pdf)

<sup>7</sup> <https://www.unesco.org/en/ethics-science-technology/bioethics-and-human-rights>

# OUR APPROACH

## *Challenges*

The healthcare industry is facing global risks arising from new challenges associated with human rights in its day-to-day operations. These challenges involve various aspects such as equitable access to medicines and treatments, ethical concerns in clinical research and conducting operations in manners that might affect society negatively. Main challenges of human rights within the plasma industry also include ethical conduct on plasma donations and protection of health and wellbeing of donors. These risks could potentially impact people's health, customer confidentiality, children's rights, and instances of discrimination, highlighting the need for a committed and collaborative approach to ensure the health and well-being of communities globally. Grifols is actively evaluating these risks and impacts, aiming to enhance society's well-being, foster inclusiveness, and improve working conditions. Simultaneously, the company is taking accountability for any negative consequences that might arise from its actions.

OUR  
APPROACH



## Importance

The UN Guiding Principles have set forth a global standard, mandating businesses to conduct human rights due diligence. This entails the expectation that businesses assess and effectively manage the impacts stemming from their operations and business relationships. A human rights due diligence is not static, but an ongoing, responsive and changing process that helps enterprises anticipate and prevent or mitigate impacts related to human rights that may be associated with their operations, supply chains and other business relationships.

The assessment of human rights impacts is a critical step in the due diligence process. To this end Human Rights Impact Assessment (HRIA)<sup>8</sup> is a methodology to assess and address impacts at the project or activity level. HRIA is an iterative process for identifying, understanding, assessing and addressing the adverse effects of companies on the human rights enjoyment of impacted rightsholders such as workers and community members. As per the Danish Institute for Human Rights, HRIA of business activities can provide a structured approach to:

- Identify adverse human rights impacts, including understanding these from the perspectives of impacted rightsholders.
- Determine measures to address any adverse human rights impacts identified (through prevention, mitigation and remediation).
- Facilitate dialogue between a business, rightsholders and other relevant parties, in particular human rights actors.
- Facilitate capacity building and learning for company stakeholders, rightsholders and others involved in the impact assessment, including through raising awareness of respective rights and responsibilities.
- Enhance the accountability of businesses through documenting the impacts that have been identified and the actions taken to address them.
- Build partnerships between businesses and other stakeholders to address human rights impacts, including through developing joint actions to address cumulative impacts or legacy issues; and
- Identify learning that might inform human rights due diligence practices regarding other projects or activities.

In conclusion, conducting an HRIA in a pharmaceutical company is crucial to ensure that its activities respect and promote human rights, contributing to the well-being of communities and the sustainable success of the company in an ethical and responsible environment.

<sup>8</sup><https://www.humanrights.dk/projects/human-rights-impact-assessment>

### *Parties involved*

This due Diligence process is an extension of the company's ongoing effort to identify and manage its corporate risk assessment with a clear focus on Human Rights.

For this Human Rights dedicated assessment, more than 11 departments and teams within Grifols have been involved:

Departments involved – Risk Owners	
Clinical Operations	Data Protection Office
Compliance	Energy & Environment
Corporate Affairs	Internal Audit & Enterprise Risk Management
Patient Relations	Launch Unit & Market Access
Corporate Human Resources	Global Procurement
Corporate Quality	



# DUE DILIGENCE PROCESS

Aiming to identify and analyze significant risk events and to comprehend the character and scope of human rights risks, our approach is based on the Human Rights-Based Approach (HRBA), which is a normative methodology rooted in globally acknowledged human rights principles. Additionally, we draw inspiration from the UN Guiding Principles Interpretive Guide and the OECD Due Diligence Guidance for Responsible Business Conduct. The objective of this assessment is to establish a cornerstone for directing Grifols' efforts concerning its real and potential effects on human rights. This endeavor seeks to actively advance, safeguard, and uphold human rights responsibilities in practical terms. It involves the incorporation of the standards and principles from international human rights law into Grifols' programs' plans and processes.

The evaluation exercise follows different phases according to the OECD Due Diligence for Responsible Business phases and the HRIA of The Danish Institute for Human Rights. The OECD Due Diligence Guidance encompasses six key elements and many of these are embedded in HRIA; the OECD recognizes HRIA as a useful method to identify actual and potential human rights impacts.

OECD Due Diligence for Responsible Business	HRIA of The Danish Institute for Human Rights
<b>PHASE 1:</b> Integrate respect for human rights into management and policy-making systems.	
<b>PHASE 2:</b> Identify and evaluate real and potential adverse impacts associated with Grifols' operations, products or services.	Planning and scoping
	Data collection and baseline development
	Analyzing impacts
<b>PHASE 3:</b> Cease, prevent and mitigate adverse impacts	Impact mitigation and management
<b>PHASE 4:</b> Track implementation and its results	
<b>PHASE 5:</b> Reporting on how impacts are addressed	Reporting and evaluation
<b>PHASE 6:</b> Take corrective action or cooperate in its implementation where appropriate	Impact mitigation and management

## **PHASE 1 - Integrate respect for human rights into management and policy-making systems.**

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 reviews and monitors compliance with the Human Rights Policy, as well as any procedures derived from the same, including by identifying any appropriate enhancements to such procedures or business processes.

Grifols regularly carries out Human Rights due diligence procedures to ensure that our business practices are aligned. Grifols' Investor Relations & Sustainability Department works in coordination with other departments to enhance full integration of respect for human rights in the company and in all the markets in which it operates.

The company has developed specific policies to address its most significant risks, based on human rights risk assessment and the due diligence process. These policies offer guidance on how to address specific risks or our positioning and commitments with key rightsholders, such as the Plasma Donor Policy, the Patient and Patient Organization Policy, the Environmental Policy, the Anti-Corruption Policy, among others.

<sup>9</sup>[https://d306pr3pise04h.cloudfront.net/docs/issues\\_doc%2Fhuman\\_rights%2FGuidetoHRIAM.pdf](https://d306pr3pise04h.cloudfront.net/docs/issues_doc%2Fhuman_rights%2FGuidetoHRIAM.pdf)

## **PHASE 2 – Identify and assess actual and potential adverse impacts associated with the enterprise’s operations, products or services**

*Phase 2.1. - Identifying actual and potential adverse impacts: Determine the human rights benchmark, develop a baseline, and identify related risks.*

The first part of the process to identify Grifols' current and potential human rights impacts has focused on comparing different think-tanks, international organization and statements that provide conceptual frameworks. International frameworks and agreements such as the ICCPR (International Covenant on Civil and Political Human Rights), the ICESCR (International Covenant on Economic, Social and Cultural Rights), the UDHR (Universal Declaration of Human Rights) and the ILO (International Labor Organization), along with principles supported by Grifols such as the Declaration of Helsinki and the Universal Declaration on Bioethics and Human Rights (UDBDH).

These were contrasted with the 35 human rights of the Guide to Human Rights Impact Assessment and Management (HRIAM)<sup>9</sup> based on the Universal Declaration of Human Rights and the corresponding international covenants.

After consolidating the list of human rights, 99 risks associated with them were identified as potentially relevant to Grifols' activities. This process was based on the review of company policies and a detailed analysis of political, demographic, economic and social factors in the countries in which Grifols operates. Interviews were conducted with teams from various areas to compare the list of risks and ensure alignment with current risk assessment procedures.

This list was classified into 17 final risk groups, or risk events, which were associated with a group of affected rightsholders, countries in which the risk event may be greater or lesser, and duty-bearers, those responsible for covering the specific event.

## PHASE 2 – Identify and assess actual and potential adverse impacts associated with the enterprise’s operations, products or services

### *Phase 2.2 - Assessing actual and potential adverse impacts associated with the Grifols’ operations, products or services.*

Grifols has established a methodology for evaluating current and potential human rights risks, which is described in detail in this report. The assessment considers severity (scope, scale, and remediability) and likelihood to determine the level of criticality.

Close collaboration with Internal Audit & Enterprise Risk Management team enabled alignment between the dedicated human rights risk assessment methodology developed in 2022 and 2023 with the global corporate risk assessment. Grifols held meetings with each identified risk owner from the previous phase to explain the defined risk assessment methodology and evaluate risk events. The purpose was to guide them in determining the criticality of both current (already occurred) and potential (yet to occur) risks.

Risk owners, based on parameters determined in the human rights assessment methodology, has determine the inherent criticality based on:

**Severity**, where impact is judged by factors such as the:

- **Scope\***: considers the number of rightsholders affected by the violation of Human Rights.
- **Scale**: contemplates the reduction in the quality of life of the victim.
- **Remediability**: comprises the ability to return the victim to the state prior to the adverse impact.

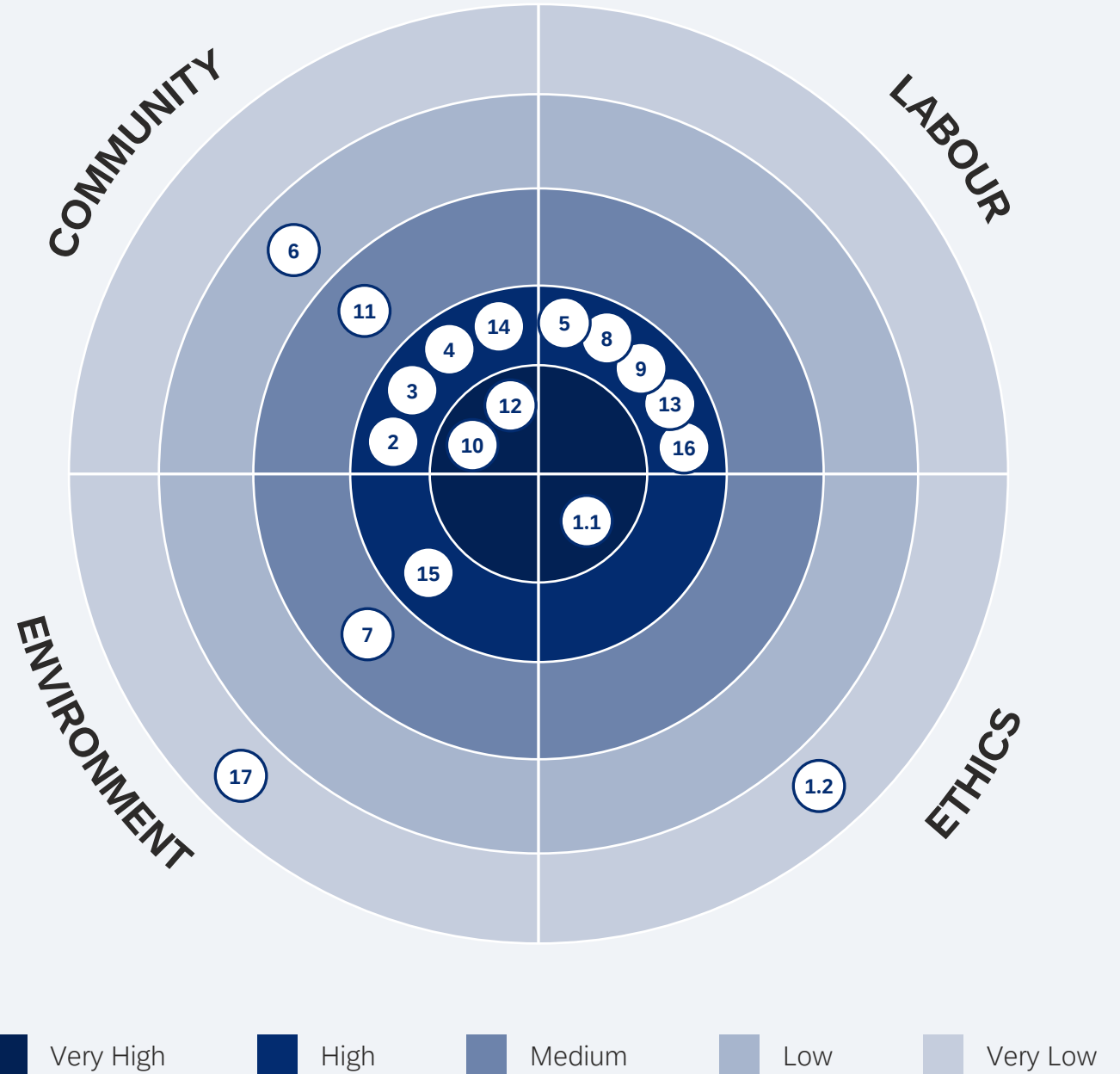
\*For the assessment of the severity of risks concerning rightsholders that Grifols’ has access to little information, the attribute 'scope' has been adapted to a qualitative definition to enable evaluation by the risk owners

**Likelihood**: considers probability that a specified risk event will occur in a 1-3 year period.

**CRITICALITY =  $\sqrt{\text{SEVERITY} \times \text{LIKELIHOOD}}$**

The graphic below\* outlines the adverse impacts on human rights that Grifols has assessed, categorized according to their inherent criticality.

### Inherent Criticality: Ranking Identifies Adverse Impacts



Risk ID	Risk title	Right-holders Assessed	Regions Assessed
1.1	Breach Business Integrity (corruption)	Local Communities	USA; Europe; Regions where the risk of human rights violations is inherently high
1.2	Breach Business Integrity (tax evasion & money laundering)	Local Communities	
2	Discrimination; lack of inclusion and diversity	Customers; Donors; Patients; Participants in clinical trials; Employees; Suppliers' Employees; Customers' Employees; Suppliers	
3	Failing to consider the dignity and secure of donors and participants in clinical trials	Donors; Participants in clinical trials	
4	Failure to deliver accessible and affordable medicines	Customers; Patients	
5	Failure to respect collective bargaining and the right of association	Employees; Suppliers' Employees; Customers' Employees	
6	Inappropriate remedies	Local Communities	
7	Non-responsible use of natural resources (especially water)	Local communities	
8	Inequitable and unfavorable working conditions	Employees; Suppliers' Employees; Customers' Employees	
9	Modern slavery	Employees; Suppliers' employees; Customers' employees	
10	Negative impact of processes on health	Donors; Participants in clinical trials	
11	Non-responsible communication & marketing practices	Customers; Donors; Participants in clinical trials; Patients	
12	Not complying with the quality and safety of the product	Patients	
13	Not respect children's rights	Employees; Suppliers' employees; Customers' employees	
14	Not respect privacy	Donors; Participants in clinical trials; Employees; Patients; Suppliers' Employees; Customers' Employees	
15	Unhealthy atmosphere	Local communities	
16	Violence at work	Employees; Suppliers' employees; Customers' employees	
17	Waste pollution related to improper disposal of medicines and packaging	Local communities	

## PHASE 3 & 4 - Risk Management & Monitoring

### *Phase 3 - Cease, prevent and mitigate adverse impacts*

Grifols has established a robust control environment to address and mitigate adverse impacts throughout its operations, emphasizing a culture of respect and responsibility. This three-tiered approach involves entity-level controls, including Grifols' Code of Conduct and the whistleblowing channel (Grifols Ethics Line). Additionally, controls extend to policies such as human rights, diversity, and anti-corruption. At the highest tier, a detailed matrix assigns responsibility for specific controls, ensuring a comprehensive and tailored risk management process.

In the human rights due diligence process, Grifols evaluated the existence of these controls, identifying potential improvement opportunities. While we've made notable progress in managing human rights risks within our value chain, there remains an area of residual risk that requires our attention. Human Rights Due Diligence is a continuous improvement journey. At Grifols, we acknowledge that our current efforts, while impactful, offer opportunities for further enhancement throughout our value chain. We are committed to reinforcing our strategies to mitigate and remediate these risks more effectively. In 2024, we initiate the rollout of an action plan dedicated to enhancing the ESG framework at Global Procurement. Addressing this challenge is key to our goal of achieving a more thorough and successful approach to human rights risk management.

### *Phase 4: Track implementation and results*

This phase involves actively monitoring the implementation of Grifols' due diligence activities and rigorously assessing their effectiveness. Grifols adopts a comprehensive approach, including measures for identification, prevention, mitigation, and, if necessary, remediation of impacts, especially in the context of its business relationships. Continuous tracking ensures that human rights impact mitigation measures are not only implemented but also function as intended. If challenges or issues arise during monitoring, the company promptly implements corrective measures.

In addition, Grifols, through the Internal Audit department, carries out periodic audits of various departments and operations. As part of these audits or as necessary, Internal Audit may review and monitor compliance with this the existing Human Rights Policy, as well as any procedures derived from it, including identifying any appropriate improvements to such policies and procedures or in business processes.

## PHASE 5 & 6 – Communicate the findings and remedy any breached human right

### *Phase 5 - Communicate how impacts are addressed*

Grifols communicates the outcomes of its human rights due diligence process both externally and internally. Externally, a concise report is published on the company's website, ensuring accessibility for all stakeholders, including rightsholders. Internally, findings are shared with involved departments and communicated through Grifols' intranet, fostering internal awareness, and emphasizing the company's commitment to transparency, accountability, and ongoing efforts to address human rights risks.

### *Phase 6: Provide for or cooperate in remediation when appropriate*

Grifols' dedication extends to providing and collaborating with legitimate redress mechanisms, allowing affected parties and rights holders to voice their concerns and seek resolution. In situations where disputes arise about Grifols' responsibility for adverse impacts, the referral to credible redress mechanisms becomes crucial. The company acknowledges the responsibility to ensure effective access to redress for individuals affected by its operations, involving the establishment of clear channels and procedures for filing complaints, seeking remedies, and resolving disputes related to human rights impacts. By actively engaging in the remediation process and facilitating accessible redress mechanisms, Grifols demonstrates its commitment to accountability, responsibility, and ethical human rights practices.

Grifols annually reports the total number of human rights violation cases in the Integrated and Sustainability Annual Report. In 2023, there were no reported incidents of child labor, forced or compulsory labor, or human trafficking.



# MAIN CONCLUSIONS & OPPORTUNITIES

The company has conducted a thorough due diligence process aligned with human rights guidelines and frameworks. In the second year, notable improvements were made, extending the analysis of human rights risks throughout the entire value chain.

Overall, the assessment indicates the existence of control measures in place to mitigate key human rights risks, resulting in a low overall residual risk for most of Grifols' activities. Despite initial concerns on relevant human rights issues related to the supply chain, particularly regarding the well-being of supplier's employees, initiatives such as the Supplier Code of Conduct and Global Procurement Policy arise as an opportunity to increase Grifols' abilities to mitigate and respond optimally to those risks. Therefore, Grifols is currently working on the improvement of its formal plans and controls to ensure respect for human rights in its entire supply chain.



The following table summarizes very high and high inherent risk-resulting impacts, next to their related rightsholder and mitigation measures in place to address the potentiality of said impact. Finally, a responsibility role is assigned to Grifols' regarding their involvement in the negative impact's origination.

Identified Inherent Risk	Rightsholder	Mitigation Measures
<b>Negative impact of processes on health</b>	Donors	<p><b>Entity Level:</b></p> <ul style="list-style-type: none"> <li>• Grifols Code of Conduct</li> <li>• Grifols Ethics Line</li> </ul> <p><b>Policies, Procedures, and training:</b></p> <ul style="list-style-type: none"> <li>• Plasma Donor Policy</li> <li>• Sustainability policy</li> </ul> <p><b>Specific controls:</b></p> <ul style="list-style-type: none"> <li>• Supervision responsibility of quality processes</li> <li>• Different levels of audits (of the donors' centers, the regional team, corporate level).</li> <li>• All plasma collection centers must be licensed by the FDA.</li> <li>• Grifols has several informatic systems to control the frequency their donors donate</li> </ul>
	Participants in clinical trials	<p><b>Entity Level:</b></p> <ul style="list-style-type: none"> <li>• Grifols Code of Conduct</li> <li>• Grifols Ethics Line</li> </ul> <p><b>Policies, Procedures, and training:</b></p> <ul style="list-style-type: none"> <li>• Sustainability Policy</li> </ul> <p><b>Specific controls:</b></p> <ul style="list-style-type: none"> <li>• Grifols follows Ethics Committees (EC) and Investigational Research Boards (IRBs) which determine if the inclusion of the vulnerable population is adequately justified and that safeguards are implemented to minimize risks unique to each participant.</li> <li>• Clinical trials are monitored by Grifols to protect the rights and well-being of participants, ensure data accuracy from sources, and comply with the protocol, Good Clinical Practices (GCP), and regulatory requirements.</li> </ul>

<p><b>Breach Business Integrity (corruption)</b></p>	<p>Local communities</p>	<p><b>Entity Level:</b></p> <ul style="list-style-type: none"> <li>• Grifols Code of Conduct</li> <li>• Grifols Ethics Line</li> </ul> <p><b>Policies, Procedures and training:</b></p> <ul style="list-style-type: none"> <li>• Anticorruption Policy</li> <li>• Fiscal Compliance and Good Practices Policy</li> <li>• Trainings on anti-corruption regulations</li> <li>• Internal procedures</li> </ul> <p><b>Specific controls:</b></p> <ul style="list-style-type: none"> <li>• Grifols performs periodic internal and external audits</li> <li>• Third-party compliance questionnaires</li> </ul>
<p><b>Not complying with the quality and safety of the product</b></p>	<p>Patients</p>	<p><b>Entity Level:</b></p> <ul style="list-style-type: none"> <li>• Grifols Code of Conduct</li> <li>• Grifols Ethics Line</li> </ul> <p><b>Policies, Procedures and training:</b></p> <ul style="list-style-type: none"> <li>• Patients and Patients Organizations Policy</li> <li>• Anti-falsification Policy</li> </ul> <p><b>Specific controls:</b></p> <ul style="list-style-type: none"> <li>• Grifols has external certifications of the quality systems of the production plants of medicines and health products.</li> <li>• Grifols ensures top safety and quality in providing innovative therapies to patients. Divisions adhere to strict policies monitored through KPIs. The company has established surveillance systems to promptly address adverse reactions</li> </ul>
<p><b>Modern slavery</b></p>	<p>Suppliers' employees</p>	<p><b>Entity Level:</b></p> <ul style="list-style-type: none"> <li>• Grifols Code of Conduct</li> <li>• Grifols Ethics Line</li> </ul>
<p><b>Not respecting children's rights</b></p>	<p>Suppliers' employees</p>	<p><b>Entity Level:</b></p> <ul style="list-style-type: none"> <li>• Grifols Code of Conduct</li> <li>• Grifols Ethics Line</li> </ul>

*\*Access to more information about the Procedures, Codes and Policies mentioned in this table*

<b>Violence at work</b>	Suppliers' employees	<b>Entity Level:</b> <ul style="list-style-type: none"> <li>• Grifols Code of Conduct</li> <li>• Grifols Ethics Line</li> </ul>
<b>Failure to respect collective bargaining and the right of association</b>	Suppliers' employees	<b>Entity Level:</b> <ul style="list-style-type: none"> <li>• Grifols Code of Conduct</li> <li>• Grifols Ethics Line</li> </ul>
<b>Not respecting privacy</b>	Suppliers' employees	<b>Entity Level:</b> <ul style="list-style-type: none"> <li>• Grifols Code of Conduct</li> <li>• Grifols Ethics Line</li> </ul>
<b>Discrimination, lack of inclusion and diversity</b>	Donors	<b>Entity Level:</b> <ul style="list-style-type: none"> <li>• Grifols Code of Conduct</li> <li>• Grifols Ethics Line</li> </ul> <b>Policies, Procedures and training:</b> <ul style="list-style-type: none"> <li>• Plasma Donors Policy</li> </ul>
	Patients	<b>Entity Level:</b> <ul style="list-style-type: none"> <li>• Grifols Code of Conduct</li> <li>• Grifols Ethics Line</li> </ul> <b>Policies, Procedures and training:</b> <ul style="list-style-type: none"> <li>• Patients and Patients Organizations Policy</li> </ul>
	Employees	<b>Entity Level:</b> <ul style="list-style-type: none"> <li>• Grifols Code of Conduct</li> <li>• Grifols Ethics Line</li> </ul> <b>Policies, Procedures and training:</b> <ul style="list-style-type: none"> <li>• Diversity and inclusion Global Policy</li> <li>• Human Rights Policy</li> <li>• Sustainability Policy</li> </ul> <b>Specific controls:</b> <ul style="list-style-type: none"> <li>• Monitoring and Evaluation Commission for Equality Plans</li> </ul>

*\*Access to more information about the Procedures, Codes and Policies mentioned in this table*

<p><b>Unhealthy atmosphere</b></p>	<p>Local Communities</p>	<p><b>Entity Level:</b></p> <ul style="list-style-type: none"> <li>• Grifols Code of Conduct</li> <li>• Grifols Ethics Line</li> </ul> <p><b>Policies, Procedures and training:</b></p> <ul style="list-style-type: none"> <li>• Energy Policy</li> <li>• Climate Action Policy</li> <li>• Environmental Policy</li> <li>• Internal training for employees on climate action.</li> </ul> <p><b>Specific controls:</b></p> <ul style="list-style-type: none"> <li>• Environmental Programs aligning Grifols' commitment to decarbonize,</li> <li>• Short and long-term science-based targets in line with Paris Agreement objectives to limit global warming to below 2°C based on pre-industrial levels and continue efforts to limit warming to 1.5°C</li> <li>• Regularly identify the risks and opportunities stemming from climate change, based on the recommendations of the Task Force on Climate-related Financial Disclosure (TCFD)</li> </ul>
<p><b>Failing to consider the dignity and secure of participants in clinical trials</b></p>	<p>Participants in clinical trials</p>	<p><b>Entity Level:</b></p> <ul style="list-style-type: none"> <li>• Grifols Code of Conduct</li> <li>• Grifols Ethics Line</li> </ul> <p><b>Policies, Procedures and training:</b></p> <ul style="list-style-type: none"> <li>• Internal procedures that ensure the timely publication of the results of all clinical trials.</li> <li>• Sustainability Policy</li> </ul> <p><b>Specific control:</b></p> <ul style="list-style-type: none"> <li>• Grifols has a strict protocol is also followed to ensure that participants provide legitimate individual informed consent.</li> </ul>
<p><b>Failure to deliver accessible and affordable medicines</b></p>	<p>Customers</p>	<p><b>Entity Level:</b></p> <ul style="list-style-type: none"> <li>• Grifols Code of Conduct</li> <li>• Grifols Ethics Line</li> </ul> <p><b>Policies, Procedures, and training:</b></p> <ul style="list-style-type: none"> <li>• Sustainability Policy</li> <li>• Price-setting Policy</li> </ul> <p><b>Specific controls:</b></p> <ul style="list-style-type: none"> <li>• Grifols has a monthly control of countries at risk of stock-out</li> </ul>
<p><b>Inequitable and unfavorable working conditions</b></p>	<p>Suppliers' Employees</p>	<p><b>Entity Level:</b></p> <ul style="list-style-type: none"> <li>• Grifols Code of Conduct</li> <li>• Grifols Ethics Line</li> </ul>

*\*Access to more information about the Procedures, Codes and Policies mentioned in this table*

# Glossary

<b>UNGPs</b>	<u>United Nations Guiding Principles on Business and Human Rights</u> : Provide a global framework to prevent and address the negative impacts of business activities on human rights.
<b>OECD Guidelines for Multinational Enterprises</b>	<u>Organization for Economic Co-operation and Development</u> : voluntary principles offering recommendations for responsible business conduct by multinational companies. Covering areas like human rights and the environment, they aim to promote ethical practices and sustainability in the global business community.
<b>ILO</b>	<u>International Labor Organization</u> : United Nations agency that promotes international labor standards, social justice, and the rights of workers worldwide.
<b>UDHR</b>	<u>Universal Declaration of Human Rights</u> : foundational document adopted by the United Nations in 1948 that outlines basic rights and freedoms to which all individuals are entitled, irrespective of nationality or status.
<b>HRIA by Danish Institute</b>	<u>Human Rights Impact Assessment</u> : is a process that evaluates the potential and actual human rights impacts of policies, programs, projects, or business activities. The goal is to identify, prevent, and mitigate any adverse effects on human rights
<b>ICCPR</b>	<u>International Covenant on Civil and Political Human Rights</u> : fundamental civil and political rights that are inherent to all individuals, such as the right to life, freedom of expression, and the right to a fair trial.
<b>ICESCR</b>	<u>International Covenant on Economic, Social and Cultural Rights</u> : major international treaty adopted by the United Nations that outlines and protects a range of economic, social, and cultural rights.
<b>HRIAM</b>	<u>Guide to Human Rights Impact Assessment and Management</u> : Developed for companies committed to assessing and managing the human rights risks and impacts of their business activities, it provides guidance on how to identify, assess and integrate findings on existing impacts on human rights.