

Intellectual Property Policy

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1. Purpose

This corporate policy (the “**Policy**”) describes the principles and the rules in place in Almirall for the adequate protection of the company’s Intellectual Property and of the knowledge and information related to this Intellectual Property.

2. Scope

This Policy applies to Almirall SA and all the legal entities of Almirall group (altogether “**Almirall**” or the “**Company**”) and their respective employees. When an external party is engaged by the Company it should abide by this Policy to the extent applicable.

3. Policy elements

3.1 Protection of information related to Intellectual Property

The information related to the Company’s Intellectual Property is particularly sensitive and should at no time be conveyed outside the Company without authorisation. Any information that has not already been explicitly disclosed by Almirall is confidential, forms part of the Intellectual Property of the Company and must be protected by means of the appropriate mechanisms, i.e. patents, industrial secrets and controlled publications.

3.2 Patents

The subject-matter of Almiralls’ patent applications and their filing sequence shall be defined on a case-per-case basis by the Department of Intellectual Property in collaboration with the corresponding inventors, departments and teams and in accordance with the nature of the product or project to which they relate.

The fundamental criterion for the selection of the countries where Almirall should file patent applications is the possibility to rightfully enforce the patents against illegal infringers.

In this regard, Almirall commits to not file or try to enforce patents in Low Income Countries (LICs), as identified in the lists published periodically by the World Bank, nor in Least Developed Countries (LDCs), as identified in the lists published periodically by the United Nations Organisation. Furthermore, Almirall commits to filing and enforcing its patents only in a limited number of the more developed or higher income countries.

In addition, Almirall acknowledges and accepts the rights of all the countries in the World to use the flexibilities of the WTO (World Trade Organisation) Agreement on TRIPS (Trade-Related Aspects of Intellectual Property Rights), under certain conditions, as contemplated by the WTO and in accordance with the best practices of the pharmaceutical industry.

3.3 Industrial Secrets (Know-How)

Since the patent system contemplates the publication of all patent applications, in those cases where filing a patent application would result in the excessively early disclosure of particularly sensitive matters, the industrial secret is a meaningful alternative to be considered for protecting Almirall's Intellectual Property.

3.4 Controlled publications

3.4.1 Review of publications

The Department of Intellectual Property is responsible for coordinating the review and authorisation of any communication, presentation, article, paper, work, editorial, letter to the editor, thesis or text which has been prepared by an Almirall employee or sponsored by Almirall and that is to be published or disclosed in a scientific journal, congress, conference, course or any other kind of publication.

3.4.2 Disclosures related to clinical trials

The Departments of Regulatory Affairs, Global Clinical Development and Global Medical Affairs are responsible for ensuring that all documents and information which are related to clinical trials in their respective areas of competence are reviewed by the Department of Intellectual Property and by other relevant departments, in order to avoid the disclosure of any sensitive information forming part of Almirall's Intellectual Property, always in compliance with the corresponding official guidelines on transparency.

Examples of such documents are Investigator's Brochures (IB), Investigational Medicinal Product Dossiers (IMPD), Clinical Trial Applications, Clinical Protocols, as well as any information that will eventually be disclosed in public databases on clinical trials.

3.4.3 Communication of confidential intellectual property to third parties

Almirall's confidential intellectual property shall be communicated to third parties, such as potential R&D or commercial partners, suppliers, CROs or consultants, only if it can be guaranteed that its confidential nature will be respected and always under a Confidential Disclosure Agreement (CDA).

3.5 Other forms of Intellectual Property: TradeMarks; Designs; Internet Domain Names; International Non-Proprietary Names (INNs)

Almirall's portfolio of trademarks, designs and internet domain names is managed by the Department of Intellectual Property, which is responsible for the clearance, filing, maintenance and surveillance of all the trademarks, designs and internet domain names related to Almirall products. The Department of Intellectual Property is also responsible for the clearance of new INNs for Almirall's products at a late stage of development.

The primary responsibility for the generation of names suitable as trademarks or INNs for Almirall's products corresponds to the relevant Departments of Marketing and Medical Affairs.

3.6. Defence and enforcement of Almirall's Intellectual Property Rights

In case of conflicts and litigations concerning Almirall's Intellectual Property assets in any territory, e.g. validity challenges, revocation requests, infringements by third parties, infringements by Almirall of third parties' rights, etc. the Department of Intellectual Property is responsible, in collaboration with the Legal Department, for planning and executing the best course of action, in accordance with the Corporate Legal Policy and Litigation SOP and, if applicable, with the

provisions in the licensing agreements in place. This includes selecting appropriate external counsel; negotiating a litigation budget; proposing specific actions; instructing external counsel; and coordinating settlement negotiations.

4. Governance

Corporate Policy Sponsor: Chief Scientific Officer
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Corporate Policy Owner: Executive Director Intellectual Property
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All employees are required to report any suspected violation of this Policy in accordance with Almirall Code of Ethics and other internal guidelines. Suspected violations can be reported to the direct manager, People & Culture, the local Compliance Officer, the Legal representative or through the [SpeakUp! channel](#)