

CRIME PREVENTION POLICY

1. INTRODUCTION

At Grifols, we recognize the importance of maintaining the highest standards of ethical and legal conduct in all our operations. That is why the Board of Directors assumes the responsibility of establishing and overseeing this Crime Prevention Policy (the "**Policy**") that reflects our strong commitment to ethics, honesty, and transparency. This Policy is not limited to complying with the legal requirements established for legal entities following the reform of the Spanish Criminal Code by Organic Law 5/2010, of June 22, and its subsequent amendments, but also reflects the corporate values and ethical principles that are the foundation of our business culture and guide all our actions and decisions.

It is the responsibility of everyone at Grifols, from senior management to each employee, to ensure that our actions reinforce this vision, thus guaranteeing the ongoing trust and respect of our clients, partners, and the community at large.

2. PURPOSE

This Policy aims to express Grifols unambiguous rejection of crimes, infringements and unethical behavior, as well as Grifols firm determination to eradicate them; and to establish a framework that enables the prevention, detection, and response to the commission of crimes within Grifols.

To further develop this Policy, Grifols has implemented a specific and effective internal control system to provide reasonable assurance to external parties and legal authorities that Grifols fulfills its duties of oversight, monitoring, and control over its activities, by establishing effective controls to prevent crimes or to significantly reduce the risk of their commission, in an environment of continuous revision and updating (the "**Crime Prevention Model**").

3. SCOPE

This Policy applies to all employees, executives and directors of Grifols, S.A., and its subsidiaries and associated companies ("**Grifols**").

In companies where Grifols has financial interests but no effective control, Grifols will encourage the adoption of, and compliance with, the principles and guidelines established in this Policy. Additionally, Grifols will promote the application of the principles and guidelines established in this Policy among its partners throughout the entire supply chain.

4. PRINCIPLES OF CONDUCT

The principles governing the Crime Prevention Model are the following:

- a) To comply with the applicable legislation and internal rules, and act upon the principles set forth in Grifols' Code of Conduct.
- b) To reinforce Grifols' commitment to its corporate values and its rejection to behaviors associated with illegal or wrongful acts.

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- c) To foster an ethical culture at Grifols through transparency and corporate governance in business activities. Integrity, ethics, honesty, trust and transparency should be the cornerstone of any decision-making by the directors, executives and employees.
- d) To promote management systems aimed at preventing, detecting and responding to any wrongful acts carried out within Grifols.
- e) To inform of employee's responsibility in notifying and reporting breaches of the applicable laws and regulations, actions that contravene the Code of Conduct, and/or that violate Grifols' policies and procedures.
- f) To train Grifols directors, executives and employees in the risks associated with their activities; as well as in the policies and tools that Grifols has in place to manage criminal risks. Training should be regularly provided to ensure that directors, executives and employees are up to date.
- g) To ensure that the Audit Committee has the human and material resources required to efficiently and proactively monitor the observance and enforcement of this Policy.
- h) To investigate any claim of any allegedly criminal or irregular act, guaranteeing the maximum confidentiality to the individuals involved, in accordance with the applicable laws.
- i) To collaborate with judicial and administrative authorities in relation to any investigation of allegedly criminal acts or of other aspects, as required.
- j) To sanction, when necessary, those who have committed an illegal act or have breached an internal rule while performing activities on behalf of Grifols. Sanctions should be in accordance with the Company's disciplinary measures and the applicable law.

5. ROLES AND RESPONSABILITIES

Board of Directors

The Board of Directors is responsible for developing and implementing the Crime Prevention Model, including the approval or modification of this Policy, to ensure compliance with applicable laws, standards, and regulations.

Audit Committee

The Audit Committee advises and provides specialized support to the Board of Directors in external audits, internal control systems, preparation of financial reports and compliance with applicable laws, regulations and the Grifols' Code of Conduct.

The Board of Directors has delegated to the Audit Committee the responsibility for the vigilance and supervision of the Crime Prevention Model, as well as making significant decisions regarding its management and monitoring.

To fulfill such responsibilities, the Audit Committee relies on the independent functions of the Internal Audit & Enterprise Risk Management department ("**Internal Audit & Enterprise Risk Management**"), the legal advisors of Osborne Clarke, as well as independent experts.

The Audit Committee will ensure the autonomy of Internal Audit & Enterprise Risk Management, guaranteeing it has the necessary resources to monitor compliance with this Policy, and will receive regular updates on its activities through the Chief of Internal Audit & Enterprise Risk Management.

Internal Audit & Enterprise Risk Management

The independent functions of Internal Audit & Enterprise Risk Management are responsible for the operational management of the Crime Prevention Model, including the annual assessment of the effectiveness of the Model.

Specifically, the main responsibilities of Internal Audit & Enterprise Risk Management are:

- Develop the annual plan that defines the objectives, activities, and the human and material resources necessary to ensure that the Crime Prevention Model remains current over time.
- Identify, analyze, and evaluate the risks and controls related to criminal activities.
- Test that the controls implemented to mitigate risks are operating effectively and, where necessary, implement additional controls and/or remediation plans.
- Promote and monitor timely compliance and resolution of recommendations and action plans identified from the annual assessment or due to non-compliance or inefficiencies revealed through detection processes.
- Prepare an annual report that details the activities performed throughout the year, the results of these activities, and, if relevant, any deviations from the annual plan.

Senior Management

Senior management leads by example, integrating the requirements of the Policy into the operational process and procedures, and fosters awareness of the Policy among the employees.

Senior management also collaborates with Internal Audit & Enterprise Risk Management to identify, analyze, and evaluate criminal risks, and to ensure the availability of resources.

All Grifols Employees

All Grifols employees are responsible for understanding and adhering to the provisions of this Policy, as well as other Grifols' policies and procedures, particularly the Code of Conduct, and for acting in compliance with applicable laws, rules, and regulations.

Grifols expects all employees to collaborate in the annual assessment of the Crime Prevention Model's effectiveness by diligently providing the requested information and documentation.

External Reviewer

The external reviewer independently evaluates the Crime Prevention Model to ensure its adequacy and effectiveness, following the scope and frequency set by the Audit Committee, and at a minimum, biennially. The audit results are presented to the Audit Committee.

Specifically, the external reviewer will: (i) verify that the key elements of the Crime Prevention Model comply with the requirements established in applicable regulations; and (ii) analyze whether the model includes adequate and effective control measures, both in design and operational effectiveness, to prevent or, if necessary, detect and respond to crimes.

6. COMMUNICATION OF BREACHES

The Grifols Ethics Line is the communication channel enabled by Grifols that allows employees and external stakeholders to raise concerns about ethical issues or report any conduct that may constitute a violation of applicable laws, rules and regulations, as well as internal policies and procedures in a confidential manner. Grifols does not tolerate retaliation of any kind, direct or indirect, against those who report a concern in good faith.

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The Grifols Ethics Line is available by phone and online 24 hours a day, 7 days a week. The channel's functioning and the protection measures for whistleblowers, are detailed in the Grifols Ethics Line Policy, available on the corporate website.

7. RESPONSE TO NON-COMPLIANCE

7.1. Internal investigation and response procedures

Grifols may become aware of criminal or irregular acts through its internal control mechanisms, or through internal or external communications. In any case, as soon as a potential irregularity is known, the internal mechanisms for investigation and response are activated, in accordance with the standard operating procedure for internal investigations.

Internal Audit & Enterprise Risk Management leads internal investigations, in collaboration with other departments, and under the coordination of Grifols' legal advisors, ensuring that they are carried out in an impartial, thorough, and appropriate manner.

Likewise, should a breach of this Policy be detected, Internal Audit & Enterprise Risk Management analyzes the causes that have led to it and assesses the need to implement additional supervision and control measures.

7.2. Disciplinary system

Grifols will sanction behaviors that may constitute a violation of applicable laws, rules, and regulations, or of internal policies and procedures. The severity of the sanctions will be determined in accordance with internal procedures, applicable legislation, and the disciplinary regime of the corresponding collective agreements, while respecting the laws of the different countries in which Grifols operates.

8. TRAINING AND AWARENESS

This Policy is available to all employees and can be accessed by all of Grifols' stakeholders via the corporate website. Furthermore, to ensure its proper comprehension and effective implementation, Grifols will conduct communication, training, and awareness activities through Internal Audit & Enterprise Risk Management.

9. POLICY APPROVAL, VALIDITY AND UPDATE

This Crime Prevention Policy was originally approved by the Board of Directors of Grifols, S.A. in a session held on the 26 of October 2018 and amended by agreement of the Board of Directors on the date 17 of December 2024.

The Audit Committee will regularly review the content of the Policy to ensure that it reflects legal and organizational changes, as well as the recommendations and best practices in effect at any given time, and, if necessary, will propose the modifications it deems appropriate to the Board of Directors of Grifols, S.A. for approval.