

GRIFOLS

MODERN SLAVERY & SUPPLY CHAIN TRANSPARENCY STATEMENT

**FOR THE FINANCIAL YEAR ENDING
31 DECEMBER 2024**

This document outlines the measures we have implemented, in the last financial year ("Reporting Period"), to ensure that slavery, child labor and human trafficking are not occurring within the operations and supply chains of Grifols, S.A. and its subsidiaries (together "Grifols", "we" or "our"). Legislation enacted in various jurisdictions, including certain U.S. states, U.K., Australia and most recently Canada, mandates that specific businesses disclose their efforts in this area. These laws encompass the California Transparency in Supply Chains Act of 2010, the United Kingdom Modern Slavery Act of 2015, the Australian Modern Slavery Act of 2018, alongside Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canadian Act). In Australia, our reporting entity is Grifols Australia Pty Ltd, in the UK, Grifols UK Ltd and in Canada, Grifols Canada Ltd., Grifols Canada Therapeutics Inc., Grifols Canada Plasma, Inc., and Grifols Canada Plasma – Ontario Inc. Where this Statement refers to just those entities that report pursuant to the legislation outlined above, they are referred to as "Reporting Entities".

Through this annual disclosure, we aim to equip our stakeholders with the necessary insights to make informed choices regarding our products. Additionally, in alignment with recognized reporting standards and applicable regulations, Grifols ensures the inclusion of comprehensive details related to our supply chain management in the Integrated and Sustainability Annual Report; publicly available on Grifols' website ([grifols.com](https://www.grifols.com)).

1. GRIFOLS: COMPANY STRUCTURE AND SUPPLY CHAIN

Grifols is a leading global healthcare company. Our trusted and innovative plasma-derived medicines, other biopharmaceuticals and solutions in transfusion medicine enable millions of patients around the world to lead more productive lives.

Since 1909

We have strived to promote innovation and advance plasma science and diagnostic solutions to make a positive social impact. Guided by our longstanding solid values and ethical principles, we integrate responsible and sustainable business practices into all our operations.

The company has more than 23,800 employees, based in more than 30 countries and regions, who work to provide our products and services in more than 110 markets. More than 60% of our workforce have administrative roles or work as manufacturing operators; the rest of the workforce are distributed among professionals, senior professionals, management, senior management, directors and executives. Globally, over 57% of our staff are women. There is more detail on our global presence in our [*Integrated and Sustainability Annual Report*](#) (grifols.com).

Grifols entities with reporting pursuant to this Statement are:

- **Grifols SA** is the parent company of the Grifols Group. It is domiciled in Sant Cugat del Vallès (Barcelona), Spain.
- **Grifols Australia Pty Ltd** (ACN 050 104 875) was established in 2011 and is based in Melbourne – Victoria, Australia. This entity manufactures diagnostic products and supports the distribution and sale of Biopharma products in the Australian and New Zealand markets.
- **Grifols UK Ltd** was established in 1979. Based in Cambridge, the company covers the UK markets supporting the distribution and sale of therapeutic and other pharmaceutical products, especially hemoderivatives. Biotest (UK) Ltd merged with Grifols UK, Ltd in 2023.
- **Grifols Canada Ltd** was established in 2011. Based in Mississauga, the entity covers the Canadian market supporting the distribution and sale of biopharmaceutical products.
- **Grifols Canada Therapeutics Inc.** was acquired in 2020. Based in Montreal, Quebec, it conducts business in the Pharmaceuticals and Medicines Industry. Its subsidiary **Grifols Canada Plasma, Inc.**, and its subsidiary **Grifols Canada Plasma – Ontario Inc.** are headquartered in Quebec supporting plasma collection efforts in Canada.

Business units:

- **Plasma Procurement and Biopharma:** Plasma procurement, production and commercialization of plasma and non-plasma products (85% of revenues).
- **Diagnostic:** Leading-edge diagnostic solutions for blood and plasma analyses (9% of revenues).
- **Bio supplies:** High-quality biological products for non-therapeutic use (3% of revenues).
- **Others:** Specialty pharmaceuticals and hospital management solutions (3% of revenues).

Grifols' Supply Chain:

Grifols' supply chain, characterized by its global scope and complexity, engages thousands of suppliers across the globe. It includes providers of goods and services essential for plasma collection, medicines and diagnostic device production, storage, and distribution, including raw materials, finished products and logistics. This includes chemicals such as sorbitol and ethanol, plastics such as PP or PVC, glass, machinery, and electronics, among others.

Our supply chain also includes goods and services for supporting our research and development efforts, encompassing clinical research organizations, lab services, equipment, personal protective

equipment, uniforms, and necessary materials, and the operational aspects of our company, like IT infrastructure, utilities, professional consulting, sales and marketing, and facilities management.

The Grifols Global Procurement Department, headquartered in Barcelona, Spain, oversees the governance of both direct and indirect procurement areas, including the transactional process and category management, in addition to establishing policies and processes. On a local level, each Grifols site maintains its own purchasing infrastructure, tailored to manage the specific site needs.

2. ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS IN OUR OPERATIONS AND SUPPLY CHAIN

In general terms, we took the following steps during the Reporting Period to prevent and reduce the risk of modern slavery in our business and supply chains:

- Complied with Grifols' Human Rights Policy;
- Undertook a ESG risk assessment with external experts to reinforce the human rights due diligence processes.
- Implementation of a ESG analytic and data control tool as part of our supplier risks management practice.
- Incorporation of a ESG risk management specialist on the Global Procurement department.
- Approval of Code of Conduct for Suppliers.

Details on the foregoing are set out in further detail in this Statement.

3. MODERN SLAVERY RISKS IN OUR OPERATIONS AND SUPPLY CHAINS

Where we use the term “modern slavery,” we refer to situations of exploitation such as forced labor, human trafficking, debt bondage, slavery and slavery-like practices, and child labor¹ (including the worst forms of child labor).

In our operations:

There is a low risk of modern slavery in our operations because of our policies and procedures (as outlined below) and wages provided to employees, including their entitlement to resign in accordance with local laws. Grifols' Human Rights Policy clearly states our commitments on employee's rights, including respect for freedom of association and collective bargaining

In our Plasma Donation Centers:

There is a low risk of modern slavery on our plasma donation centers because of our policies and procedures. As stated in our Plasma Donor Policy, Grifols' interactions with its stakeholders, including donors, are founded on a deep-seated respect for human dignity and human rights. This fundamental respect underpins Grifols' Human Rights Policy and Code of Conduct, which applies to all Grifols' employees. The safety, health and well-being of Donors is always Grifols' first priority.

¹ As defined in the Canadian Act to include labor or services provided or offered to be provided by a person under the age of 18 years and that: (a) are provided or offered to be provided in Canada under circumstances that are contrary to the laws applicable in Canada; (b) are provided or offered to be provided under circumstances that are mentally, physically, socially or morally dangerous to them; (c) interferes with the person's schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely or requiring them to attempt to combine school attendance with excessively long and heavy work; or (d) constitutes the worst forms of child labor as defined in article 3 of the Worst Forms of Child Labor Convention, 1999.

In our supply chains:

Our greatest risk of being connected to modern slavery comes from our supply chain. Unlike our direct workforce, Grifols has limited oversight and control over external workers who are not directly supervised by our managers. These individuals may have a lower awareness of their rights, making them more vulnerable to modern slavery. Our 2024 ESG double materiality assessment and our 2023 Human Rights Due Diligence process concluded that risks exist regarding certain human rights issues, including modern slavery. We are aware of inherent modern slavery risks in the following sectors that are present in our supply chain: manufacturing (including chemicals), information technology (IT), personal protective equipment (PPE), textiles, packaging and plastics, logistics (including shipping), cleaners, hospitality and utilities. At times, Grifols also purchases goods that originate from jurisdictions with a higher inherent risk of modern slavery according to the Global Slavery Index². Grifols therefore acknowledges that, with a supplier base spanning thousands of entities across various industries and regions, there is a potential risk of modern slavery. Our commitment to continuous improvement and proactive risk mitigation is unwavering. Moving forward, Grifols is working to enhance its risk assessments to obtain more detailed insights into these risks and strengthen our control measures.

We consider that this risk assessment is reflective of the risks in the operations and supply chains of the Group, including each of the Reporting Entities.

4. HUMAN RIGHTS AND MODERN SLAVERY

As formally stated in our Human Rights Policy, Grifols is committed to taking steps to ensure that modern slavery, child labor or human trafficking is not taking place in any part of its supply chain or in any part of its business. In line with our Human Rights Policy, Grifols expects and requires all vendors to respect internationally recognized human rights in their business activities and in their respective supply chains.

Grifols unequivocally rejects any form of child, forced or compulsory labor and human trafficking. Grifols expects and requires all contracted suppliers and business partners to adopt the requisite measures to ensure the absence of these practices in their organizations and supply chains. Furthermore, Grifols is committed to promoting and protecting the welfare of all communities in which it operates. Grifols uses international references as a starting point to foster corporate responsibility and protect human rights in all its activities, including its value chain. Grifols' efforts to guarantee human rights are guided by the following covenants:

- A.** The International Bill of Human Rights, comprising the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights
- B.** The fundamental rights in the eight International Labor Organization (ILO) core conventions as established in the Declaration on Fundamental Principles and Rights at Work
- C.** The European Charter of Fundamental Rights
- D.** The World Medical Association's Declaration of Helsinki
- E.** UNESCO's Universal Declaration on Bioethics and Human Rights

² *The Global Slavery Index 2023. Minderoo Foundation Pty Ltd*

In parallel

Grifols also respects and observes all applicable laws, regulations and international human rights conventions, including:

- The UN Guiding Principles on Business and Human Rights
- The Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises
- The UN Global Compact, of which Grifols is a signatory and supporter of its 10 principles
- The ILO Tripartite Declaration of Principles Concerning Multinational Enterprises and
- Social Policy

5. GRIFOLS' POLICIES IN RELATION TO HUMAN RIGHTS

Grifols is committed to ensuring that we conduct our business worldwide with respect for human rights and in compliance with all applicable laws and fair labor practices. Grifols' support and respect for fundamental human rights is reflected in its corporate strategy, policies and codes, including among others:

Human Rights Policy	Code of Conduct for Suppliers	Diversity and inclusion Policy	Ethics Line Policy	Sustainability Policy
Procurement Policy	Code of Conduct	Policy on Directors Diversity	Plasma Donor Policy	

All of these policies were in place throughout, or implemented during, the Reporting Period.

6. PROCESSES IN PLACE IN RELATION TO HUMAN RIGHTS

Grifols' four main areas of action:

1. Culture of understanding and respect for human rights
2. Human Rights Policy
3. Human Rights Due Dilligence
4. Grievance mechanisms – Grifols' Ethics Line



In 2024 Grifols took the following steps to manage the risk of modern slavery in its operations and supply chain:

Operations

- Gathering information on employees' recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily.
- Identifying employee training opportunities in relation to modern slavery. Although we did not provide any formal training to employees during the Reporting Period specifically dedicated to modern slavery (however, we plan to develop training programs in the near future in this regard), the corporate sustainability responsible at Grifols has enrolled at the UN Global Compact Business & Human Rights Accelerator 24/25, and the Global Procurement ESG risk management specialist at Grifols attended multiple external webinars on human rights in the supply chain.
- Complying, adopting and/or implementing the policies listed in section 5 above.
- Ensuring a decent living wage for our employees, in line with their country's economic context. To this end, Grifols performs annual reviews to assess country-specific costs of living and market wages, periodically updating compensation levels as needed.
- Maintain grievance mechanisms: more detail is provided below.
- Promoting internal accountability: Grifols' Code of Conduct requires all employees to "comply with all applicable laws, rules and regulations" and failure to comply can result in discipline or termination. Engaging in, or promoting, slavery and/or human trafficking are contrary to all applicable laws, and such conduct would be met with appropriate consequences. No such behavior was identified during the Reporting Period.

Supply chains

- Since 2024, Grifols' Global Procurement department has dedicated a specialist exclusively to managing risks and ESG (criteria within its value chain).
- Mapping supply chains: Grifols continued to comprehensively map of our supply chain in order to segment supplier portfolio based on category and country to enhance oversight and control.
- Contracting an external expert to conduct an analysis to identify and assess ESG risks in our supply chain. This analysis was structured into three main phases: (1) ESG risk assessment by country and industry, (2) ESG performance analysis of key suppliers and (3) definition of an action plan.
- Contracting a technological solution to identify, monitor and classify supplier ESG risks, including modern slavery, based on the identified risk levels. This new platform also facilitates an ESG audit process, leveraging public information and, for high-risk suppliers, documented evidence provided concurrently with their survey responses.
- Monitoring key suppliers: Grifols ensures the application of supplier management practices and performance metrics, as well as defines which are significant and, in turn, subject to greater ESG scrutiny. For this segmentation, Grifols bases its analysis on their category and the annual expenditure generated with the supplier. In 2024, 43% of suppliers by spend (volume) were evaluated under ESG criteria.
- Maintaining compliance with our corporate Human Rights Policy (including child protection);
- Physical auditing selected suppliers to evaluate aspects such as quality management, the presence of training programs, organizational structure documentation, company function definitions, and document management systems, among others.
- Verifying Product Supply Chains via contractual obligations: Grifols' standard supplier terms require all of its suppliers to comply with all applicable laws in the jurisdictions in which they operate.

Human rights Due Diligence

Grifols has been analysing and reviewing its human rights due diligence processes since 2022 to progressively identify and manage human rights risks and impacts across its value chain. In 2023, Grifols bolstered its human rights due diligence by performing a thorough analysis to identify, prevent and mitigate related impacts and main risks integrating industry best practices. Furthermore, in 2024, an analysis to identify and assess ESG risks in our supply chain has been conducted. The main findings have been published in the 2024 Integrated and Sustainability Annual Report and the 2023 Human Rights Due Diligence Report. This due diligence process and the resultant reporting follow the Human Rights Based Approach (HRBA), UN and OECD guidelines.

In line with these frameworks, Grifols has approached due diligence in the following manner:

- I. Considered in the analysis not only the geographies where the company is most active but also those regions where the risks of human rights violations are inherently greater. This approach aligned with OECD recommendations and served to enhance Grifols' commitment to responsible business practices.
- II. Assessed the adverse impacts of Grifols on the rightsholders across its value chain of the company, including tier I suppliers, joint ventures, and others. This focus extended to the most vulnerable groups, including employees, third-party employees, local communities and other relevant rightsholders.
- III. 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.
- IV. Transparently reported results, main risks and focus areas in its 2024 Integrated and Sustainability Annual Report (grifols.com).

Grifols offers remediation mechanisms to help affected parties voice their concerns and seek solutions. The company recognizes this responsibility by establishing clear channels for filing complaints and resolving human rights-related disputes.

And also, offers grievance mechanisms. As outlined in the Code of Conduct, the Code of Conduct for Suppliers, Human Rights Policy and Ethics Line Policy, the Grifols Ethics Line provides an independent and accessible communications channel for employees in its value chain and all its stakeholders to confidentially raise concerns about ethical issues or report conduct that may constitute a violation of applicable laws, regulations or internal policies, including those related to human rights. Reports can be made anonymously, verbally or in writing, and all communications are treated with the utmost confidentiality. The Grifols Ethics Line is accessible 24 hours a day, 7 days a week, in 16 languages, via the Grifols corporate website, intranet and by phone. To guarantee its successful operation, Grifols has assigned an ombudsperson to study all allegations received and ensure they are properly processed and investigated, including that appropriate measures are implemented in the event of misconduct or non-compliance.

Additionally, Grifols promotes a culture of understanding and respect for human rights. Training in relation to the following key policies and procedures is mandatory for all staff: Code of Conduct, Human Rights Policy, Environmental Management and Diversity Awareness Program. We have in place a process to identify and follow up individuals that have not completed mandatory training. We plan to develop specific training for employees in relation to modern slavery.

Among the main Key Performance Indicators that the company tracks are: number of concerns or reports received through the Ethics Line related to human rights violations (including modern slavery), number of employees trained yearly on Code of Conduct, and number of employees that sign the corporate Human Rights Policy yearly. Most relevant KPIs are disclosed annually in our

third-party verified Integrated and Sustainability Annual Report, in accordance with recognized and comparable reporting regulations and standards.

There is nothing to report with respect to measures taken during the Reporting Period to (i) remediate any forced labour or child labour, or (ii) remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in the activities and supply chains of the Canadian Reporting Entities or any other entity included in this Statement.

7. CONTINUOUS IMPROVEMENT, MONITORING AND EFFECTIVENESS

The promotion and protection of human rights is supervised by our board of directors, specifically via its Sustainability Committee. As stated in Grifols' Human Rights Policy, Grifols' Board of Directors entrusts the Sustainability Committee to monitor and ensure the compliance of the Policy, as well as its management and associated risks, under Article 3 of the Committee's regulations. They are ultimately responsible for assessing the effectiveness of our actions in relation to modern slavery.

Grifols, through its office of Internal Audit, conducts regular audits of various departments and operations. As part of these internal audits, in 2024 the 2023 Modern Slavery Statement was audited, and on an as-needed basis, Internal Audit may review and monitor compliance with the Human Rights Policy, which encompasses specific modern slavery commitments, as well as any relevant procedures, including by identifying any appropriate enhancements to those policies and procedures or in business processes.

In collaboration with other departments and external experts, the Investor Relations and Sustainability Department support the integration of respect for human rights into Grifols' processes and activities in its markets of operation.



Grifols is committed to continuous improvement in our fight against modern slavery, child labor and human trafficking.

In 2024, we effectively addressed many of the risks identified in our human rights' due diligence, demonstrating significant progress in our due diligence processes. Grifols will continue to conduct due diligence to actively prioritize risks, monitor and implement best practices to enhance the effectiveness of our efforts across our operations and supply chains. In 2025 we plan to continue progressing on supply chain management enhancing internal processes and controls over ESG risks, including modern slavery.

8. CONSULTATION

Supervision of modern slavery risk management activities is undertaken by our Board. This statement was drafted by representatives from Grifols S.A., who have responsibility for each of the Reporting Entities and their owned or controlled entities described in section 1 of this Statement.

As a result, consultation with each of the Reporting Entities covered by the Statement and their owned or controlled entities was undertaken at a leadership or functional level in the process of preparing this Statement. This included local legal teams. A copy of this Statement was provided to each Reporting Entity before it was approved.



9. ABOUT THIS STATEMENT



This Statement is for the period from 1 January 2024 to 31 December 2024 and has been prepared for the Reporting Entities, covering Grifols S.A. and its subsidiaries pursuant the following acts:

- The United Kingdom's Modern Slavery Act 2015
- Australia's Modern Slavery Act 2018
- California's Transparency in Supply Chains Act (S.B. 657) 2010
- Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023



This Statement has been formally approved by the Board of Directors of Grifols S.A, as the higher entity of the Grifols Group on behalf of each of the Reporting Entities on May 30, 2025.

Nacho Abia

Chief Executive Officer (CEO) and Board Member of Grifols S.A.

Date: May 30, 2025



Annex A MANDATORY REPORTING CRITERIA FOR AUSTRALIA

Mandatory criteria		Page number(s)
a)	Identify the reporting entity	1 - 2
b)	Describe the reporting entity's structure, operations and supply chains.	2 - 3
c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	3 - 4
d)	Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	3 - 7
e)	Describe how the reporting entity assesses the effectiveness of these actions.	7 - 8
f)	Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	8

Annex B APPROVAL AND ATESTATION FOR CANADA

- ➡ This Statement is the joint report pursuant to subparagraph 11(2)(b) of the Canadian Act by Grifols SA which controls the Canadian Reporting Entities listed in Section 1 of this Statement, for the financial year ending 31 December 2024
- ➡ This Statement was approved pursuant to subparagraph 11(4)(b) (ii) of the Canadian Act by the Nacho Abia, Chief Executive Officer (CEO) and Board Member of Grifols S.A.