

Finance Policy

Document	Finance Policy
Purpose	Global regulations surrounding the Finance area
Approver	Risk and Compliance Committee (CRC)
Date	February 13 th 2024

Confidentiality – This document is confidential. Therefore, it should not be distributed outside Grupo J. Uriach, S.L. and other Group companies without the consent of the Board of Directors.

1. Introduction and purpose

The objective of this Finance Policy (hereinafter, the “**Policy**”) is to define, design and disseminate the commitments and principles assumed by the Uriach Finance area.

In this sense, this Policy aims to provide Uriach with a solid framework designed to guide members of the Finance area in making decisions and actions that reflect Uriach's values.

2. Scope of application

Within the scope of application of this Policy, we can distinguish the following:

- a) **Corporate scope** – This Policy is applicable to all companies belonging to Uriach, as well as to subsidiary and investee companies over which Uriach has effective control or holds positions on the administrative bodies.
- b) **Personal scope** – This Policy is applicable to members who are part of the Finance area, without prejudice to their hierarchical situation or that it must be observed by other members of Uriach.
- c) **Relational scope** – The scope of application of this Policy will extend, to the extent possible, to suppliers, clients, subcontracted companies or employees.
- d) **Geographic scope** – This Policy will apply to the activities that the company develops in any geographic area, both local and international.

Any exception to the rules established in this Policy is subject to the explicit approval of the Risk and Compliance Committee (RCC). In the event of any discrepancy or query regarding this Policy, the relevant guidance and assistance must be offered by the Operations department.

3. General principles related to the Finance area

The Finance Department plays a pivotal role in supporting the financial well-being and strategic objectives of Uriach. This Policy outlines the general principles and standards that govern the Finance Department's operations across the entire Group. The document aims to ensure consistency, transparency, and compliance in financial management practices.

3.1. Department Overview

The Finance Department is responsible for managing Uriach's financial resources, providing accurate and timely financial information, and supporting strategic decision-making.

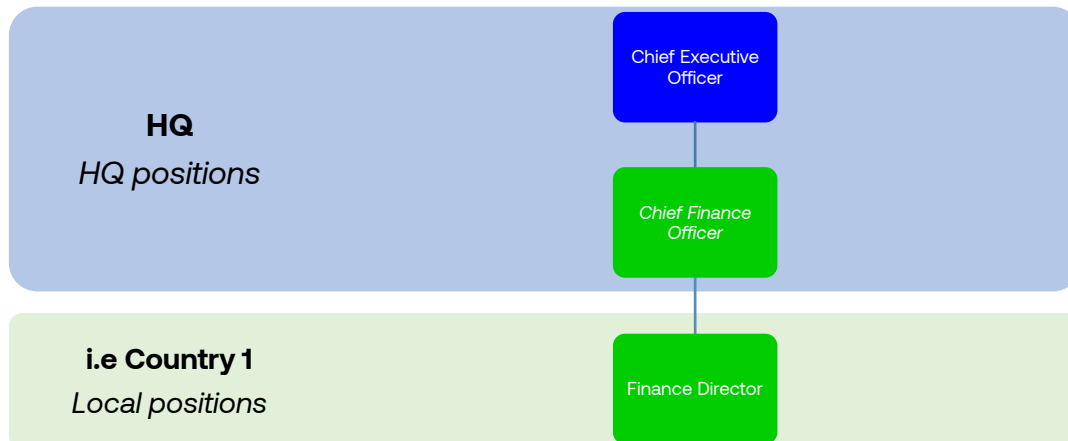
Key functions within the Finance Department include:

- **Financial Controlling & Reporting**, aimed to ensure accurate financial information is produced on a regular basis in order to take relevant decisions.
- **Treasury Management**, responsible for optimizing Uriach's capital structure, managing liquidity, and overseeing cash flow forecasting.
- **Consolidation**, which involves combining and reconciling financial data from all of the affiliates of Uriach to present the comprehensive performance of the whole Group.
- **Accounting**, that systematically records, analyses and report financial transactions.
- **Revenue Management**, which performs data-drive analysis to optimize the pricing strategy of the Group.

3.2. Reporting Structure

The Finance Department operates under a centralized structure with a reporting line to the Chief Financial Officer (CFO) in Headquarters (“HQ”).

Each affiliate within Uriach has a dedicated Finance Director who reports directly to the CFO.



This reporting structure is designed to ensure alignment with global financial strategies while allowing for localized expertise to address regional nuances.

3.3. General Principles

i) Financial Integrity and Compliance:

- All financial transactions must be conducted with the utmost integrity and in compliance with applicable laws and regulations.
- The Finance Department is committed to maintain accurate and transparent financial records through adherence to Uriach’s accounting guidelines.

ii) Strategic Financial Planning:

- The Finance Department actively participates in the development and execution of strategic financial plans that align with the overall business objectives of Uriach.
- Continuous financial analysis and scenario planning are conducted to support effective decision-making.
- The identification, assessment, and management of financial risks, including but not limited to cash management, interest rate exposure, and adherence of ongoing business to the budget, etc. are integral part to the Finance Department's responsibilities.
- Mitigation strategies must be implemented to safeguard Uriach's financial health and safety.

iii) Budgeting and Forecasting:

- The Finance Department leads the annual budgeting process in collaboration with Finance Directors across the Uriach affiliates.

- In addition to the annual budgeting process, it is also prepared a forecast with actuals as of 30.04 (“4+8”) and as of 31.08 (“8+4”).
- Regular monitoring of financial performance against budgets and forecasts is essential, with timely adjustments as needed.

iv) Financial Reporting:

- Timely and accurate financial reporting is a fundamental responsibility of the Finance Department, ensuring compliance with Uriach accounting standards and regulatory requirements. This includes monthly reporting in accordance with agreed timelines.
- Except for specific entities that are not considered to be material in the context of the whole Group, external audit is required.
- Finance management of each affiliate is closely monitored from HQ, with a permanent interaction, in-site visits and scheduled video conference meetings.

v) Treasury Management:

- The Finance Department is responsible for optimizing Uriach's capital structure, managing liquidity, and overseeing cash flow forecasting.
- Ensuring adequate funds for day-to-day operations and strategic initiatives is a key priority. Cash is monitored on a weekly basis and is projected for the following 2 months and for the year-end.

vi) Revenue management:

- Implement data-driven pricing strategies that align with overall business objectives, taking into account demand elasticity, seasonality and market trends. Continuously monitor and refine pricing models to maximize revenue and profitability across all affiliates.

vii) Technology Integration:

- Embracing technological advancements in finance, such as data analytics and automation, is encouraged to enhance efficiency and accuracy in financial processes. This includes ad-hoc tools such as the ones that can be used, for example, for treasury management, as well as ERP with the aim of having this implemented across Uriach.

4. Review, Approval, and Dissemination of the Policy

The CRC, together with the Finance Department will periodically review this Finance Policy to ensure its relevance and effectiveness. Updates may be made as necessary to reflect changes in business conditions, regulations, or best practices.

The competent body for the approval of this Policy is the Finance Department and CRC.

The CRC, in coordination with the Finance area, shall ensure that the Policy is communicated and shared at all levels of Uriach, either through publication, express acceptance, training, warning and/or possible warnings for non-compliance with Uriach's regulations.

5. Non-compliance

All members of the Finance area, as well as the rest of the Members of Uriach subject to this Policy, have the obligation to comply with the provisions of this Policy, as well as the obligation to report any breach of its contents through the Compliance Channel. As a consequence, labor disciplinary measures may be imposed as deemed proportional to the risk or damage caused.

The measures adopted from a legal perspective will always be respectful of the applicable regulations, without losing forcefulness or proportionality with the seriousness of the facts from which they arise, informing if appropriate the Legal Representatives of the Workers.
