

Global Sustainability Oversight and Compliance

Global Sustainability Oversight

Viatri's Board of Directors oversees management's efforts with respect to corporate environmental and social responsibility matters through its Governance and Sustainability Committee. The Global Sustainability function operates as a center of excellence within the Corporate Affairs leadership team. The Chief Corporate Affairs Officer reports directly to the CEO and communicates quarterly with the Viatri's Board through the Governance and Sustainability Committee together with the Head of Global Sustainability. On an annual basis the Governance and Sustainability Committee reviews progress with the Chief Corporate Affairs Officer on corporate environmental and social responsibility-related matters that have been discussed with the Viatri's Board to confirm the company is tracking its priorities in this area. The Head of Global Sustainability drives the strategic and operational development of sustainability across the company together with key partners.

The global sustainability function includes members in the U.S., Europe and India, with key partners across other functions and geographies. A multifunctional Advisory Committee comprised of global leaders with a monthly meeting cadence monitors the external landscape, company progress and supports the integration of corporate environmental and social responsibility activities across the organization. Progress on strategic focus areas and execution of relevant tasks rely on a broad and engaged network of functional leaders across the company. Additional structured forums are convened on a monthly to quarterly cadence, addressing areas of focus with regards to sustainability and CSR for specific key functions, such as the Sustainable Sourcing Council and Operations and CSR working group and others, complementing the advisory committee.

Viatri's Board of Directors oversees management's efforts to execute on the company's corporate strategy, including helping to improve access to medicine worldwide. Access is fundamental to our mission. It is not an initiative; it is our business model. Our corporate strategy is to do our part to increase sustainable access to medicine, as we strive to help build more resilient healthcare systems for people across the world by executing core operations across research and development, manufacturing and supply chain, distribution, and market outreach and policy engagement. In addition, community engagement and philanthropic donations complement those core activities.

The primary components of Viatri's Enterprise Risk Management process include the following:

- Risk assessment is informed by the Company's governance, culture and strategic objectives
- The identification of risks as captured within the Viatri's Risk Universe
- The prioritization of risks
- Management of risks by identified risk owners throughout the organization
- Review of risk performance by the Risk Management Team
- Oversight by the Board of Directors, including the activities of the Compliance and Risk Oversight Committee

Risk Governance and Management

We are committed to operating ethically and with integrity and seek to apply a holistic, enterprise-wide approach to risk management. We are subject to a number of risks inherent in the complex and rapidly changing environment in which we operate including, but not limited to, global operations, environmental and social matters. The company's management implements and administers risk management processes to identify material risks to our business. Management assesses, monitors and manages material risks to our business, all while maintaining flexibility in how we operate. To further embed risk management and compliance into our culture, we implement policies and procedures and train employees on how to comply with them.

Management reports quarterly to the Viatri's Board's Compliance and Risk Oversight Committee regarding enterprise risk, as well as other appropriate Board committees regarding risk-related matters.

Viatri's enterprise risk management (ERM) acts as a centralized lens to view risk throughout the organization. This provides enhanced visibility to Viatri's management on how the organization is managing risk and monitoring opportunities. The company's ERM process is supported by multiple functional areas, including, among others, Internal Audit, Information Technology, Information Security, Compliance, Sustainability, Environmental Health and Safety, Security, Finance, Legal, Quality and Human Relations. Risk management activities are designed to support the business and ensure the company is prepared to respond to a variety of events that may adversely impact it, such as unrest/conflicts, legal or regulatory matters, supply disruptions, pandemics and environmental events (including those related to climate change).

How Viatris Considers Price as Part of Our Commitment to Access

At Viatris, we provide an exceptionally broad and diverse portfolio for patients across a range of major therapeutic areas, spanning both noncommunicable and infectious diseases. Our global portfolio includes best-in-class, iconic brandname products as well as global key brands and generics, including branded and complex generics. Many of the medicines in our portfolio are not protected by patents and therefore are subject to a general trend of price deflation over time.

As we participate in tender programs or public private partnerships around the globe, we evaluate the price of the generics within our portfolio based on an assessment of patients' need, supply, demand, the cost of manufacturing and the affordability of our products, especially as it relates to the equivalent brand name drug, among other determinants. Other factors considered when pricing our branded portfolio include their value to patients as well as current economic indicators.

Working to ensure that patients across all income levels have access to the medicines we offer means we must carefully evaluate the socioeconomic conditions within each market where Viatris does business while simultaneously sustaining our ability to consistently provide patients with a reliable supply of the quality products they need. We work to provide holistic solutions for governments, NGOs and health systems globally, as we partner to connect more people to products and services.

We conduct periodic enterprise risk assessments to identify key and emerging risks. For each key and emerging risk identified, we have a process to establish risk monitoring ownership.

In addition to several of its oversight responsibilities, the Compliance and Risk Oversight Committee of the Viatris Board reviews significant global compliance-related policies relating to pricing and/or commercialization of the company's products and services, among other oversight responsibilities.

Information Security

We have an information security strategy that focuses on the implementation of effective controls, technologies, procedures, and training. The strategy focuses on decreasing risks, increasing operational maturity, improving security capabilities and enabling secure partnerships.

Our Information Security organization consists of an internal team of certified subject matter experts in information security, risk management, supply chain information security, incident response, access and application security, education and awareness and security operations. The team is supplemented by 24/7/365 managed security service providers who serve as the initial point of contact globally for security monitoring, incident response and vulnerability management.

Our suppliers, subcontractors and third-party service providers, including third-party managed security providers, are subject to cybersecurity obligations and controls. We conduct initial risk assessments of third-party suppliers and service providers based on various factors and then review and monitor these third-party suppliers and service providers based on their relative assessed level of risk. We also require our suppliers, subcontractors and third-party service providers to agree to cybersecurity-related contractual terms and conditions of purchase.

The Viatris leadership team is updated on a quarterly basis and as needed regarding the status of the overall cybersecurity program, emerging external and internal risks and key risk indicators performance. The Compliance and Risk Oversight Committee receives reports from senior management on data security, cybersecurity, and information security related matters on at least a quarterly basis, including with respect to related risks, risk management, and relevant legislative, regulatory and technical developments. The Chief Information Security Officer and Chief Information Officer report quarterly to the Compliance and Risk Oversight Committee of the Viatris Board regarding our information security program and performance and provide the board with performance and risk indicators as well as comparators to our peer group.

Protections Against Hacking

We run a security monitoring program in partnership with an external managed security service provider. We employ multifactor authentication and certificate-based encryption for all external access and authenticated connections. Vulnerability management and patch management processes are in place to reduce the overall threat landscape. The network is monitored at all times, using industry best practices, tools and processes. Penetration testing is conducted quarterly by internal and third-party resources based on asset risk. Cybersecurity simulations, including tabletop exercises, are executed to test the company's procedures and the internal team's ability to detect, respond and recover in the event of an attack. When first joining Viatris and then annually, employees and contract workers receive training on information security and acceptable use of company computing and information resources. Our standards and policies are reviewed on an annual basis by a third party.

As part of this program, we execute a Cybersecurity Incident Response Plan (referred to as CIRP) to establish a guide for leadership and incident response stakeholders through an "incident," that is a single event, or a set of anomalous and adverse "events" (for purposes of the CIRP, a change in a system or technology device that could impact the confidentiality, integrity, and availability of Viatris' data and technology assets) caused by malicious intent or by accident impacting Viatris' network, computing systems or digital information). The CIRP is managed by the information security team and is reviewed at least annually. We test the CIRP through technical exercises at least semi-annually, review the CIRP with executive management annually, and periodically conduct executive tabletop exercises and scenarios. The CIRP provides an overview of critical actions to take throughout the incident response lifecycle and contains a severity matrix used to guide the incident response stakeholders on communication and escalation protocols.

As part of continuing to improve our overall information security capabilities, we focus on addressing all areas of the National Institute for Science and Technology (NIST) Cybersecurity Framework (CSF):

Identify, Detect, Protect, Respond and Recovery. Most recently, we have launched an enterprise-wide behavioral education tool that provides feedback to colleagues on their individual risky behaviors and provides real-time education and awareness opportunities to take preventative actions.

Every two years, we conduct a cybersecurity maturity benchmark against the NIST CSF using the Gartner Cybersecurity Controls Assessment tool. In addition to the overall risk mitigation program, we carry a multitiered cyber insurance policy.

Global Privacy Governance

In response to the growing landscape of global data privacy laws, Viatris is committed to protecting information relating to identified or identifiable natural persons (personal data) collected and processed during the course of business activities. Additionally, Viatris recognizes a separate obligation to the individuals with whom it interacts and who trust the company with their personal data to protect that personal data and keep it secure including in locations with no regulatory requirements regarding the management of personal data.

Viatris demonstrates this commitment to data privacy laws and its obligation to individuals with the implementation of a global privacy program. The Viatris Global Privacy program reports regularly to the company's Compliance and Risk Oversight Committee and is responsible for the development, implementation, maintenance and adherence to the company's policies and procedures and applicable data privacy laws and principles. All company personnel are required to adhere to and comply with these data privacy policies and procedures and with applicable data privacy laws and principles. An internal Global Privacy Governance Document and supporting procedures, materials and training programs provide guidance to employees about how compliance is achieved.

To demonstrate this commitment and obligation transparently, a Viatris Privacy Notice (Privacy Notice) that describes our collection, use, disclosure and retention of personal data is published publicly. The Privacy Notice relates to our websites, apps, services and platforms, and the use of them, our marketing and provision of products and services, our interactions with individuals in person, by phone, or by mail, and otherwise during the operation of our business. The Privacy Notice also explains the ways in which, under applicable laws, an individual can control the processing of their personal data and exercise their rights. Also, there are supplemental privacy notices and privacy language provided directly to applicable individuals that give information relating to other areas where personal data may be collected, used, disclosed or retained by the company such as in clinical trials, safety reporting and during employment with Viatris.

The company monitors, investigates and responds to suspected and/or confirmed personal data incidents as required by applicable data protection laws and in proportion to the nature, extent and sensitivity of the personal data. Key areas within Global Privacy Governance include, but are not limited to:

- Aligning the company's practices and procedures with relevant local, national, regional and international laws, regulations and principles;
- Overseeing the revision and negotiation of privacy agreements and privacy terms;

- Privacy and data protection due diligence for third parties, including vendors and HCPs, and in connection with distribution arrangements and acquisitions;
- Ensuring appropriate and compliant responses to an individual's privacy rights requests;
- Risk assessment and management, monitoring, and audit;
- Employee training;
- Appropriate contact with relevant data protection authorities and handling inquiries and requests for information from same; and
- Investigation of any suspected and/or confirmed incidents

Cultivating Good Conduct and Compliance

Everyone within Viatris and those acting on our behalf are personally responsible and accountable for acting in a manner that helps protect the company's reputation and reflects our commitment to doing business with integrity. We implement robust policies, procedures and associated training to support that individual responsibility.

Our Global Compliance Organization

Viatris' Chief Compliance Officer (CCO) has the operational responsibility to ensure the company's corporate compliance program is effective and robust and directs its day-to-day implementation. To ensure broad perspectives and independence in the compliance department, the CCO reports to the Viatris Board's Compliance and Risk Oversight Committee and the Chief Legal Officer. The Compliance and Risk Oversight Committee makes recommendations to the Viatris Board and/or oversees the development, implementation, maintenance and monitoring of the corporate compliance program, the Code of Business Conduct and Ethics, and significant related global policies designed to support and promote compliance with company requirements, laws and regulations. This includes topics such as Anti-Corruption and Fair Competition, which are covered within the Code of Business Conduct and Ethics.

[Viatris' website](#) features the following compliance documents available for the public:

- Standards for Interactions with Healthcare Professionals ("Standards") Policy Summary
- Global Anti-Bribery and Anti-Corruption Business Standards for Vendors and Agents
- Global Fair Competition and Antitrust Business Standards for Vendors and Agents
- Global Anti-Corruption Policy Summary
- Global Antitrust and Fair Competition Policy Summary
- Code of Business Conduct and Ethics (which includes Viatris' prohibition of bribery and corruption in all forms, including money laundering, facilitation payments, and fraud)

The company's Code of Business Conduct and Ethics outlines guiding principles on how employees and those working on our behalf must conduct themselves. It also informs on policies and standards while providing high-level guidance on critical areas of the company's business operations. The compliance department is organized by operating regions and global centers of excellence. The compliance department and the Global Compliance Program are structured in a manner consistent with the Office of Inspector General of the U.S. Department of Health and Human Services (OIG) Resource Guide for Measuring Compliance Program Effectiveness.

A direct report to the CCO leads three global COEs that are anchored by our Global Compliance Service Hub and that support the company's global operating regions and business. A senior compliance leader manages each respective center of excellence, which focuses on policies, training and communications, risk assessment and monitoring, due diligence and investigations.

Our global compliance framework covers the following components and focus areas:

- Interactions with the Healthcare Community and Organizations
- Raising Concerns
- Operational Compliance
- Fraud and Corruption (e.g., anti-money laundering)
- Fair Competition, Pricing and Anti-trust
- Corporate and Securities Laws
- Fair Employment and Data Privacy Practices

As part of our continuous work for improvements and further reinforcing our commitment to compliance, we have an ongoing goal to harmonize compliance-related topics into a unified policy

In 2022, Viatris employed a third party to conduct an effectiveness assessment review that resulted in no major findings.

The assessment concluded that Viatris' Compliance department had implemented significant enhancements to all areas of their program since the formation of Viatris.

In assessing and comparing Viatris' Compliance Program against industry regulatory requirements and leading practices, the third party concluded the Compliance Program is meeting their obligations to detect, prevent and mitigate compliance risk.

We engage a third-party to review the effectiveness of our Compliance program every three to five years.

landscape across Viatris, further expanding the Global Compliance Risk Assessment and Monitoring Program into additional countries and furthering our data analytic capabilities. Looking into 2024, we are expanding the Risk Assessment to additional European and Emerging Market countries. Risk Assessments are completed annually or biannually depending on the perceived risk.

Key activities in 2023 included:

- Developing new regional documents governing key anti-corruption and anti-bribery processes as well as updating procedures describing third-party due diligence requirements.
- Developing a comprehensive risk strategy by country and region that includes Risk Assessment and data analytic monitoring dashboards, live monitoring, and targeted document review monitoring across field and headquarter based business activities.
- Expanding our Risk Assessment including reviews and risk scores associated with Viatris' products and key business activities across all regions.

Our Global Compliance Service Hub in India oversees and supports the following key areas:

- Management of Trade Control Risk
- Mergers and Acquisitions Due Diligence under the direction of global leadership
- Maintenance of system for Transparency Reporting

The compliance department oversees the development, maintenance and recordkeeping of general and administrative global policies and procedures and performs various periodic and needs-based operational audits throughout the year, often in conjunction with Internal Audit.

Identifying and Managing Compliance-Related Risks

We have comprehensive processes and procedures to monitor and assess emerging risk areas relevant to Viatris, including a risk assessment process that provides comprehensive insights into compliance risks depending on a market's geographic footprint. Global Compliance collaborates with Global Internal Audit (GIA) to identify compliance-related risks (including anti-corruption) and local affiliates to be audited and supports GIA in their reviews.

Monitoring is a Compliance-led initiative designed to support regional compliance teams to identify, analyze and address non-compliance associated to each market. The objective is to highlight potential deviations and provide guidance on focus areas and remedial action to regional compliance. Emerging risks are reviewed annually.

Our risk assessment and monitoring programs aim to identify and deter fraud and other instances of unethical behavior. The Risk Assessment factors in hundreds of data inputs across several key risk categories to provide a risk score for each market. These scores are shared with regional and in market compliance leads to raise awareness and generate targeted conversations with business leaders in their respective markets. Topics covered by monitoring include data analytics conducted by the center of excellence to identify potential deviations related to HCP interactions, live monitoring and ride-alongs to observe potential deviations at a company-organized or sponsored event or field force activities

and focused in-market reviews leveraging data monitoring. In 2023, Viatris further evolved data analytic capabilities to monitor third-party distributors as well as field and headquarter based activities.

Management of Suspected Incidents

We take all allegations of conduct that is contrary to company policy or applicable law seriously. The Investigations Center of Excellence (Investigations COE) exists to ensure that we discover and respond to potential violations of law and/or company policies. Taking each matter seriously allows us to protect the company. Viatris' Investigations COE allows for a fair, objective, independent review of all relevant facts.

When an allegation is received, a preliminary analysis is promptly conducted to determine the most appropriate review. Regional Investigation Committees are established for each business region to ensure cross functional alignment and communication among key stakeholders who are involved in internal compliance investigations.

The committee aligns on outcome and closure which may include discipline, where appropriate, and implementation of corrective and preventive actions such as training, monitoring or other improvements. Compliance matters and metrics are tracked and shared with management and the Compliance Committee of the Viatris Board on a regular cadence.

Nurturing the Culture of Compliance

In the past year, we have been putting significant focus on further building awareness and transparency among stakeholders about compliance and supporting assets.

We have further enhanced and continued our quarterly Compliance Champion Series, featuring colleagues each quarter from a different region. These stories focus on colleagues across various functions and business areas and show how the Compliance team supports their work and enables them to make an Impact via Integrity.

Also, we enhanced the disclosures on our website to further raise awareness and increase transparency towards external stakeholders and support Viatris' colleagues in their external engagement.

Looking into 2024, we will continue to further embed ethics and integrity into the business and mindset via quarterly leadership Compliance-related messaging.

Training and Education

We require and provide dedicated training on anti-corruption, fair competition and the company's Standards for Interactions with HCPs for employees with relevant job responsibilities. We also require specific training courses for individuals based on their functions. Examples include:

- Vendors who may interact with government officials on our behalf also receive anti-corruption training.
- Depending on their roles, part-time employees and contractors are required to take subsets of the trainings listed above.
- Employees who deal directly with the government receive additional, focused training related to Standards for Interactions with HCPs from their local Compliance partner(s). Our Standards for Interactions with HCPs instruct employees on proper behavior when engaging with HCPs. The standards are grounded in company-wide standards and take into consideration local laws and regulations. Any member of our workforce who interacts with HCPs is trained on the standards and is required to comply with them.

In addition to comprehensive training in relevant areas in which an employee may work, we require employees to complete regular trainings in regard to the Code of Business Conduct and Ethics, Fair Competition and Anti-Corruption, among other topics, and track completion rates. All Viatris colleagues are mandated to take the Code of Business Conduct and Ethics training. Because of employee departures and divestitures, in the calendar year of 2023, the rolling completion rate was 93%.

Training is provided for employees regarding bribery, corruption, facilitation payments, and areas of increased risk. The training also guides employees on what constitutes acceptable behavior and how to seek support when questions arise. In 2023, we launched translated versions of our interactive Compliance computer-based training modules in 11 key company languages via the company's learning management system covering the following topics: Anti-Corruption, Fair Competition, and the Code of Business Conduct and Ethics.

Viatris requires annual attestation as part of the mandatory Code of Business Conduct and Ethics training.

Reporting Compliance Concerns

We encourage open communication and provide a variety of channels for reporting potential compliance violations. Employees are encouraged to discuss compliance concerns with their supervisor, Human Relations, Legal or Compliance. They also can use the company's Compliance Line, which is operated by an external party. This is a grievance mechanism where employees are safe to report any suspicions of practices that are contrary to Viatris' policies or applicable law, anonymously (where permitted by law). The Compliance Line is available 24/7 and permits anonymous reports in countries in local languages, where permitted by law. Viatris strictly prohibits retaliation

relating to any reports made in good faith. The Compliance Line is available both on our intranet and external website.

In 2023, we worked actively to raise awareness of Viatri's Compliance program and resources, including the Compliance Line, among Viatri's colleagues during regional town halls. We regard our efforts successful as we observed an increase in reporting thereafter, which is consistent with our Compliance Line provider benchmark report.

If any Viatri's colleague has knowledge or suspects a violation of accounting standards or internal controls, they may report such concerns directly to the Audit Committee in addition to the reporting lines described in the Global Compliance Governance Document and the Viatri's Code of Business Conduct and Ethics.

Structure and Robust Procedure to Manage Reports

For investigating, resolving and remediating reported events, our global policy requirements on reporting and investigating compliance-related matters mandates thorough, timely and impartial investigation of reported concerns in coordination with the HR team as well as Legal and other functions as appropriate, and remedial actions when appropriate. The Global Compliance Governance Document is available to all employees on the company's intranet.

Every effort will be made to keep reports of Compliance-Related Matters (CRMs) and Other Reported Matters (ORMs) confidential

The Compliance Line is available in 10 key business languages for ease of reporting. It is available 24/7 via online or telephone and permits anonymous reports in countries, where permitted by law.

The compliance line is promoted on Viatri's.com and available to external stakeholders.

to the extent possible, consistent with the need to conduct an adequate investigation and in accordance with any applicable local laws. Compliance and its partners seek to maintain confidentiality throughout the investigation process. Further, all reasonable efforts shall be undertaken to help ensure that good-faith reporters do not suffer negative employment actions as a result of their allegations. If any Viatri's colleague believes that they or other Viatri's colleagues have been retaliated against for reporting a matter pursuant to the Governance Document and the Viatri's Code of Business Conduct and Ethics, they should immediately report such perceived retaliation.

The Global Investigations Procedure lays out the structure for investigation, including coordination with Human Relations and Legal, as well as other functions as appropriate to the nature of the report, and matters are triaged accordingly. Further, the Global Investigations Procedure instructs on fair and consistent remedial actions where appropriate.

Our policy requirements on reporting and investigating matters continue to be updated to incorporate specific EU Whistleblower Directive provisions. We have developed a Europe Reporting Matters Procedure outlining requirements of the EU Whistleblower Directive 2019/1973 and have implemented local and regional reporting channels where required.

Fighting Corruption and Promoting Fair Competition

Viatri's anti-corruption program is based on the elements of the U.S. Department of Justice (DOJ) and Securities and Exchange Commission (SEC) Resource Guide to the U.S. Foreign Corrupt Practices Act; the U.K. Ministry of Justice Bribery Act 2010 Guidance; and the Organisation for Economic Cooperation and Development's Good Practice Guidance on Internal Controls, Ethics and Compliance, as well as the local laws where we operate.

Key elements include:

- Our anti-corruption policy requirements set out in our Global Compliance Governance Document strictly forbid bribery and corruption in any form anywhere we do business.
- The policy defines bribery and corruption, including facilitation payments, which are strictly prohibited even where permitted under local law.
- We have monitoring and auditing procedures in place to identify and deter such payments.
- We reassess our anti-corruption program periodically and make enhancements as warranted. Training is provided for employees regarding bribery, corruption, facilitation payments and areas of increased risk. The training also guides employees on what constitutes acceptable behavior and how to seek support when questions arise. We also monitor cases of suspected conflicts of interest. Each identified case is investigated, and if concerns remain after the investigation, appropriate actions are taken.

We provide several avenues for personnel to submit concerns or seek guidance: either online or via telephone, mail or email. Colleagues can also reach out to their managers, specific departments, their local compliance support or use the Compliance Line.

As part of the company's ERM program, GIA assesses anti-corruption and anti-fraud management over entities throughout the world from a corruption risk perspective. Size (e.g. sales volume) and a country's ranking in the Transparency International Corruption Perception Index (CPI) are key to informing the potential risk profile of an entity. Entities identified as being in a higher-risk environment along with those of strategic importance to the company are a particular focus. Further, we monitor business activities that are deemed an elevated risk — such as government officials and HCP interactions — through established internal processes and controls.

Ensuring Good Conduct in External Partnerships

External partners sometimes act as intermediaries on our behalf or in settings where special skills or expertise are required. Given their role, it's essential these partners comply with the company's ethical and anti-corruption standards and act with good judgment.

The compliance department identifies business partner categories that may carry higher inherent corruption and/ or reputational risk. These high-risk business partners, noted during the business contract drafting and approval process, are subject to a risk review based on a robust due diligence process including investigation and clarification of discovered legal, civil and reputational allegations or convictions. Based upon risk, we conduct targeted monitoring of third-party distributors in Viatrix' Emerging Markets region.

Third-Party Due Diligence

Viatrix has a third-party due diligence program that is global in scope, managed by a dedicated team. Per its scope, due diligence reviews must be performed whenever Viatrix enters into certain potentially high-risk contractual agreements with third parties. The process involves an assessment of any issues (environmental, legal, social or otherwise) that have been brought to light in the public sphere regarding a supplier or any other third party.

The due diligence team in collaboration with the COE of Risk Assessment and Monitoring and Global Trade Control also manages third parties regarding:

- Business Development
- Mergers and Acquisitions

Anti-corruption provisions, right to audit clauses and ethical expectations are included in our contracts as applicable. We also have a process to train business partners who interact with government officials on the company's behalf in our anti-corruption policy requirements and procedures as well as in applicable due diligence procedures.

Compliance with our Business Standards for Vendors and Agents on anti-corruption and fair competition are required by the Viatrix Supplier Code of Conduct as well.

We provide training on relevant compliance policy requirements to contractors, external temporary workers and/or distributors on an as-needed basis depending on their function and the services they are to provide to Viatrix.

- Divestitures
- Other strategically important deals
- Global Trade Sanction screening and risk mitigation
- Restricted party screening under the global trade control procedure

In 2023, new due diligence process policies were established to further clarify requirements and educate employees on their responsibilities. Looking forward, we will continue to enhance and expand the scope of our third-party due diligence processes.

Responsible Marketing and Promotion

Our colleagues often interact with members of the healthcare community as part of their efforts to educate them on the appropriate use and efficacy of the company's products. These interactions are important and fundamental to increasing patient access but may bring elevated risk. Our Standards for Interactions with Healthcare Professionals instruct employees on proper behavior when engaging with HCPs. The standards are grounded in companywide standards and take into consideration local laws and regulations. All applicable members of our workforce are trained on the standards and required to comply with them. Additionally, training on the Viatrix' Code of Business Conduct and Ethics, which also addresses interactions with healthcare professionals, is required for all employees.

An updated summary of our Standards for Interactions with Healthcare Professionals is available on the Viatrix website.

Robust Procedures

We have well-established global, regional and local policies and procedures that inform employees on appropriate interactions with the healthcare community and requirements pertaining to drug promotion and ethical marketing. Risk assessments, monitoring and employee training are key components of each. We strive to comply with regulations and adhere to ethical standards set forth by the company and industry associations. In 2023, we worked to expand our Healthcare Interaction Professional Process into countries beyond Europe, where it was initially implemented.

We have governance in place to adhere to transparency requirements regarding disclosure of all payments towards HCPs as applicable.

Viatrix' Medical Affairs team is involved in the development and approval of all marketing material. And further, Viatrix' regulatory and legal teams review these materials in applicable markets. Beyond legal requirements, our standards are also based on industry association standards.

Our Global Marketing Operations oversee programs, policies and procedures regarding ethical marketing, including the development of material used in marketing and promotion. Only trained and qualified persons are allowed to review and approve these materials. The Global Marketing Quality function monitors quality adherence with these materials, and controls are in place to ensure that only approved material can be published.

Local procedures are mandated by the Global Policy on Promotional Materials to ensure that all promotional materials and other commercial communications are reviewed and approved internally by appropriate subject matter experts.

- The local review procedures implemented under the policy serve to ensure that all materials and communications intended for promotional or commercial purposes are accurate, truthful, medically and scientifically sound, not misleading and compliant with all applicable marketing, legal, regulatory and medical requirements and company policies.
- These local procedures include clear review processes, risk assessments and compliance monitoring as part of the company's compliance program and enterprise risk management.

Respecting Human Rights

We recognize our responsibility to respect human rights and further to support the government's responsibility to protect human rights within and beyond our own operations. We do so through our core business in building sustainable access to medicines and supporting equity in access to treatment. We also do this in how we conduct ourselves and in our dealings with partners. As a participant in the UNGC, we are committed to its Ten Principles on human rights, labour, the environment and anti-corruption and respect the International Bill of Human Rights and the Fundamental Conventions of the International Labour Organization.

Topics relevant to human rights are managed across different functions and through a variety of company policies and procedures, as applicable.

We have initiated a project to:

- Review our company policies and procedures related to human rights in the context of existing and expected global regulations;
- Understand opportunities to streamline and consolidate certain policies; and
- Optimize our internal governance structures and processes for monitoring and managing human rights issues.

As part of this review, we are assessing a variety of human rights-related topics, such as those noted to the right, to identify those topics most relevant to our business and value chain activities, with the objective of validating that our policies and procedures are appropriately designed to manage applicable risks. We expect to continue our human rights policy and procedure optimization activities over the course of 2024.

Beyond our mission and business and operating model designed to build access to medicine, Human Rights related topics covered by our policies and procedures include, but are not limited to:

- Ethical clinical Trials
- Environmental protection
- Freedom of association
- Prohibition of trafficking of persons
- Prohibition of forced and child labor
- Nondiscrimination
- Handling of identity and immigration documents
- Wages
- Working hours
- Preventing harassment
- Privacy
- Product Security and Falsified Medicines
- Recruitment practices
- Safe and healthy working conditions

Human rights topics are also incorporated into our companywide EHS program, Global EHS Supplier Operations Program and third-party due diligence program, the globally applicable Quality Management System including Responsible Clinical Operations and our Product Safety & Risk Management (PSRM) program, as well as our Product Security Governance and Information Security Program to address relevant aspects across our value chain.

The company's global policies and associated procedures, employee and partner training and due diligence procedures are the foundation of our work to mitigate the risk of human rights violations.

Engaging in Political Activity Responsibly

As part of advocating for sustainable access to medicine and holistic solutions for more resilient healthcare systems, we educate stakeholders on complex topics related to the highly regulated pharmaceutical industry. As a global healthcare company, we seek to mitigate the risk of unintended negative consequences for patients from even the most well-intended policies. In alignment with our mission and in accordance with relevant laws and regulations, Viatris may support political candidates and organizations of

Policies addressing different relevant human rights aspects include:

> [Code of Business Conduct and Ethics](#)

> [Global Policy on Bribery and Anticorruption](#)

> [Supplier Code of Conduct](#)

> [Policy Statement Regarding Slavery and Human Trafficking](#)

> [Global Policy on Combatting Human Trafficking in Persons](#)

> [Policy on Diversity and Inclusion](#)

> [Global Policy Prohibiting Discrimination, Harassment and Retaliation](#)

> [Global Health and Safety Policy](#)

> [Environmental Stewardship Policy](#)

various political parties, directly or through trade associations, in support of public policies that align with Viatris' mission and policy objectives. Among other areas of interest, we support efforts that contribute to pharmaceutical safety and innovation to further our mission to provide patients access to high-quality medicine. All political contributions are required to be made in accordance with relevant local laws, reflect Viatris' interests and are independent of the personal political preferences of any Viatris personnel. Only to the extent allowed by law may Viatris directly contribute to political candidates and political organizations. This is relevant primarily for Viatris' U.S. subsidiaries and Viatris' U.S. Political Action Committee (ViaPAC), a voluntary, nonpartisan, employee-run committee.

The Viatris Board's Compliance and Risk Oversight Committee oversees company global policies and procedures for corporate political and lobbying expenditures. A report of these expenditures, along with certain U.S. trade association affiliations is made available on our website. Viatris' policy governing political contributions also is available on Viatris.com. Within the U.S., that includes filing relevant lobbying and political contribution reports in accordance with the U.S. Lobbying Disclosure Act. Those reports can be found on the U.S. Senate Office of Public Records website or the U.S. House of Representatives Office of the Clerk website. Viatris is also required to comply with any laws that govern its lobbying and advocacy efforts generally. For more information, click [here](#).

Honoring Our Commitment as a Publicly Traded Company

Viatris Inc. is a publicly traded company listed on NASDAQ and incorporated in Delaware. The Viatris Board of Directors is responsible for oversight of the company and its management. Viatris' Board has established six committees, each of which operates pursuant to a written charter. Certain directors' duties, rights and responsibilities are detailed in the company's Certificate of Incorporation, Bylaws and committee charters, among other governance documents. Viatris is subject to applicable rules, regulations and/or listing standards of the U.S. Securities and Exchange Commission, NASDAQ and the U.S. State of Delaware General Corporation Law, among other requirements.

