

# The Code of Business Conduct and Ethics

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# INTRODUCTION

A close-up photograph of a pipette tip dispensing a clear liquid into one of the wells of a multi-well plate. The plate is filled with many other wells, some containing liquid. The background is a soft, out-of-focus purple and white bokeh.

- Our Mission
- Compliance with the Code and Applicable Policies
- Reporting Potential Violations
- No Retaliation

# OUR MISSION

At Viatris, we see healthcare not as it is but as it should be. We act courageously and are uniquely positioned to be a source of stability in a world of evolving healthcare needs.

**Viatris empowers people worldwide to live healthier at every stage of life.**

We do so, via:

## **Access**

Providing high quality trusted medicines regardless of geography or circumstance.

## **Leadership**

Advancing sustainable operations and innovative solutions to improve patient health.

## **Partnership**

Leveraging our collective expertise to connect people to products and services.

# Compliance with the Code and Company Policies



We all have the responsibility to ensure that Viatris abides by the law in every country where we do business. Compliance with this Code of Business Conduct and Ethics (the “code”), and applicable law by all Viatris directors, officers and employees is mandatory and is a condition of retention, employment or continued engagement as a contractor or agent. Viatris, at its sole discretion, may take disciplinary action, up to and including termination of employment, against anyone for violating the code, applicable law or

company policy. The code is not, and shall not be construed as, a contract of employment or any other assurance of continued employment. Viatris reserves the right to amend or replace the code by action of the Viatris Board of Directors at any time, without prior notice. The code is administered by the Compliance department.

Every Viatris employee must periodically certify that they have read the code and that they, to the best of their knowledge and belief, understand, have complied with and will continue to comply

with the code, applicable law and company policy. The Compliance department will provide the procedure for such certification. If you have any issue with making the certification required above, contact your local or regional compliance officer or liaison, or the Compliance department.

Viatris has created a repository for currently effective company policies, called “Policies Central.” You can access Policies Central via our intranet, VITA.



# Reporting Potential Violations

Viartis provides several options for you to submit concerns to Compliance: either online or via telephone, mail or email. To find the web reporting portal, local hotline phone numbers or email reporting options, go to the Compliance functional hub on VITA, or you can also find this information either on Viartis.com or a compliance poster in your work location. Online reporting is available through our functional hub on VITA. Viartis' confidential "Compliance Line" is accessible 24 hours a day, seven days a week, and you can make a report anonymously, if you choose and where permitted by law.

You are not required to identify yourself when making a report; however, doing so will enable us to ask additional questions if needed to assist with an investigation. We treat all reports with the same level of seriousness, regardless of whether you identify yourself. In certain jurisdictions, anonymous reports cannot be accepted by telephone or online portal; if this is the case in your location you will be so advised and you should pursue a different method of reporting.

All reports received will be reviewed and investigated, as appropriate, in accordance with the company's policy requirements for reporting and investigating matters and the investigation process detailed therein.



**IF YOU BELIEVE THAT YOUR CONDUCT OR THAT OF ANY OTHER PERSON HAS OR MAY HAVE VIOLATED THE CODE, APPLICABLE LAW OR COMPANY POLICY, YOU MUST REPORT THE MATTER TO YOUR IMMEDIATE SUPERVISOR, HUMAN RELATIONS BUSINESS PARTNER, THE LEGAL DEPARTMENT OR THE COMPLIANCE DEPARTMENT.**

# No Retaliation



Retaliation against any Viatris personnel who reports a compliance-related matter in good faith pursuant to the company's policy requirements for reporting and investigating matters is strictly prohibited. If you believe you have been, or are being, subjected to retaliation for reporting a matter in good faith, contact the Compliance department.

All reports of compliance-related matters must be made in good faith and be truthful to the best of the reporting party's knowledge, information and belief concerning the factual matters they report. Making a false report is prohibited.



# OPERATIONAL COMPLIANCE

- Quality and Safety of Our Products
- Protecting the Environment and Working Safely
- Safeguarding Company Assets and Information
- Proprietary Information, Intellectual Property and Trade Secrets
- Computer and IT Systems
- Accuracy and Integrity of Data, Books and Records



# Quality and Safety of Our Products

Viatriis is committed to the highest standards of product quality and safety. Our careful attention to product quality has a direct and substantial effect on our reputation and performance, and is central to our ability to empower people worldwide to live healthier at every stage of life. Our customers seek our products because they trust that every product we make will be of the highest quality.

As a pharmaceutical manufacturer, we are governed by current good manufacturing practices, good laboratory practices and other similar requirements for making and storing our products. Following these requirements strictly ensures that we continue to deliver high quality medicines, and retain our strong reputation for quality. Any concerns about product quality must be reported as soon as possible to Quality Assurance so they can be quickly and appropriately investigated, addressed and resolved. Additionally, all Viatriis employees and agents are responsible for reporting adverse events for Viatriis products to the Product Safety and Risk Management department immediately upon learning of the event. An adverse event is any untoward medical occurrence in a patient or clinical trial subject administered a medicinal product and which does not necessarily have a causal relationship with this treatment. If you have questions or would like to report an adverse event, visit the global product safety site for further contact information.



# Protecting the Environment and Working Safely

Viartis strives to protect the environment and the health and safety of our personnel, and of the communities in which we operate. Viartis' Environmental Health and Safety (EH&S) team is responsible for setting our standards and supporting our sites and businesses.

All Viartis personnel are expected to take responsibility for EH&S compliance. To do your part, you must:

- Know and comply with all applicable EH&S policies and procedures;
- Recognize potential threats to the environment, and to personal health and safety;
- Help improve EH&S performance; and
- Report concerns about potential non-compliance to your supervisor, to your local EH&S team or Compliance.

We all must familiarize ourselves with and follow security procedures, and never interfere with, or assist or encourage others to interfere with or defeat, the company's security measures.

Viartis also prohibits violence in the workplace including injuring, or threatening to injure, another person physically or intentionally damaging, or threatening to damage, property of the company or another person.

Viartis prohibits the possession of firearms or other weapons at company sites, except as may be specifically authorized for security purposes by the global chief compliance officer and global general counsel.





# Safeguarding Company Assets and Information



Viatri's assets include both physical assets, such as production equipment, tools, computers, facilities, as well as knowledge-based assets, such as trade secrets, intellectual property and other proprietary information.

Our ability to meet business objectives may be adversely affected by the loss, theft, misuse or damage of company assets. We are responsible for the appropriate use and protection of assets provided to us in the course of our work.

Viatri's property must not be used for personal benefit, sold, loaned, given away or otherwise disposed of, regardless of its condition or value, without proper authorization. Viatri's property and assets must be used only for Viatri's business purposes.

# Proprietary Information, Intellectual Property and Trade Secrets

We are responsible for protecting Viatris' proprietary information, intellectual property and trade secrets, and those that are entrusted to Viatris by others. Proprietary information is information that we learn, receive or develop as part of our work and which is not otherwise publicly available. Such information may include, but is not limited to, strategic plans, financial plans, business plans, commercial and regulatory strategies, legal strategies, research and development, sales, marketing, manufacturing and financial information. Other valuable, proprietary information may include, but is not limited to, information concerning our pipeline, products, facilities, customers and workforce. Such information is a valuable business asset that must be protected because its unauthorized use or disclosure could destroy its value to the company and give others an unfair competitive advantage.

Proprietary information, intellectual property and trade secrets must not be used or disclosed without authorization, consistent with applicable law, and we must take affirmative steps to ensure that such information is safeguarded, including but not limited to, execution by the recipient of a written confidentiality agreement approved by the Legal department prior to disclosure. We must take particular care with respect to meetings of industry associations and other situations in which we come into contact with representatives of our competitors.



**IF YOU QUESTION WHETHER VIATRIS INFORMATION IS PROPRIETARY, INTELLECTUAL PROPERTY OR TRADE SECRET, TREAT IT AS SUCH.**



# Computer and IT Systems

Viatrix' computer and IT systems are provided for Viatrix business purposes. The company has adopted an acceptable use policy that establishes proper and acceptable use of the company's computing and information resources. Please refer to the applicable Global Acceptable Use Policy requirements on Policies Central for additional information.



# Accuracy and Integrity of Data, Books and Records

All Viatris personnel must comply with all established internal controls at all times. We must accurately enter all assets, liabilities, revenues and expenses of Viatris in the company's regular books, records and other standard financial documents.

We are all required to record and report all data and information accurately and honestly. This applies to every business record or document that you prepare or contribute to as part of a team. Such documents include, but are not limited to:

- Data from tests of products or ingredients, materials, or components and related reports;
- Research, manufacturing and quality records;
- Accounting entries and any other information which will or may become part of a financial statement or related filing;
- Purchase orders, invoices and contracts;
- Any mandatory reporting, such as drug price reporting or transparency reporting; and
- Expense reports.

Many laws prohibit making false statements or false claims to government officials and entities. There potentially can be severe civil and criminal penalties, both for you personally and for Viatris, if you violate these laws.

If you prepare or contribute to any business record, or represent or certify to the accuracy of the information contained in such records, you must be diligent in assuring their accuracy and complete integrity.

All Viatris personnel must comply with all established internal controls at all times. We must accurately enter all assets, liabilities, revenues and expenses of Viatris in the company's regular books, records and other standard financial documents. These books, records and documents also must accurately reflect and properly describe the transactions they record. For example:

- No undisclosed or unrecorded fund, asset, liability or account of Viatris may be established for any purpose;
- No false or artificial entries may be made in the books, records or accounts of Viatris for any reason, and we must not engage in any arrangement that results in erroneous entries; and
- No payment on behalf of Viatris may be approved or made with the intention or understanding that any part of it is to be used for any purpose other than that which is described by the supporting documents and in the legitimate interests of Viatris.



# FRAUD AND CORRUPTION

- Product Promotion and Interactions with Healthcare Providers and Organizations
- Bribery and Corruption
- Avoiding Conflicts of Interest
- Giving and Receiving Gifts and Hospitality
- Global Trade Compliance

# Product Promotion and Interactions with Healthcare Providers and Organizations

Strict regulations govern not only our promotional activities but also our educational and commercial relationships with healthcare providers (HCPs) and organizations, including our interactions with physicians, nurses, pharmacists and others who administer, prescribe, purchase or recommend prescription medicines, and organizations that employ HCPs or otherwise provide healthcare services.

All interactions with HCPs and organizations must be guided by applicable laws, regulations and Viatris policies found on Policies Central.

The following general principles govern Viatris' interactions with healthcare providers and organizations everywhere in the world:

- We must not use any unlawful inducement to sell or to arrange for the recommendation or prescribing of our products.
- We believe that enduring customer relationships are based on integrity and trust. We seek to gain advantage over our competitors through superior products, quality, manufacturing and service, but never through improper business practices.
- Viatris' relationships with HCPs and healthcare organizations (HCOs) are intended to benefit patient care and enhance the practice of medicine. Interactions should not tempt HCPs to place their own personal interests above those of the organizations they represent or the patients who will use or need the company's products.

Viatris must not, directly or indirectly, offer or solicit any improper payment, contribution or other transfer of value for the purpose of obtaining, giving or keeping business.

Promotional activities and materials must always comply with all applicable laws, regulations and codes, and our own marketing and advertising review policies, and must be truthful, accurate, not misleading, consistent with approved product labeling and properly substantiated. Promotional activities and materials must never involve promotion of drugs for off-label indications, uses, doses or populations.

All personnel involved in product marketing or promotion must familiarize themselves with the applicable standards for interaction with healthcare providers and all related policies and procedures governing the creation, review, approval and use of promotional materials. Use of unapproved promotional materials is prohibited.

**ALL INTERACTIONS WITH HEALTHCARE PROVIDERS AND ORGANIZATIONS MUST BE GUIDED BY APPLICABLE LAWS, REGULATIONS AND VIATRIS POLICIES.**

# Bribery and Corruption

The company has also adopted global anti-corruption policy requirements as set out in our Global Compliance Governance Document, and other policies and procedures to prohibit, prevent, deter, detect bribery and to punish acts of bribery if it does occur. All Viatris personnel share responsibility for adhering to Viatris' anti-corruption policies and procedures. All Viatris personnel, especially those in leadership or management positions, must demonstrate and communicate the company's absolute commitment to these principles.

Viatris personnel must ensure that payments or benefits offered or given in connection with customary business hospitality, promotional expenses and other bona fide business expenditures are never used to improperly influence the recipient of such payment or benefit; that the recipient is permitted under the law and rules or policies of their employer to accept such benefits; and that any such payments, benefits or expenses are reasonable, customary, not extravagant or excessive, and properly and accurately described in all company records.

Viatris also prohibits any form of commercial bribery. For example, Viatris personnel must not provide, directly or indirectly, anything of value to an agent or employee of a customer, vendor or service provider with the intent of influencing that person's decision in an effort to secure that third party's business.



**VIATRIS PROHIBITS BRIBERY AND CORRUPTION IN ALL FORMS, INCLUDING MONEY LAUNDERING, FACILITATION PAYMENTS, AND FRAUD.**

Violations of the U.S. Foreign Corrupt Practices Act (the "FCPA"), the U.K. Bribery Act and local anti-bribery laws may have extremely serious legal consequences for the company and any individual involved. These consequences can include imprisonment, potentially unlimited fines, exclusion from industry and loss of employment.

Please refer to the company's anti-corruption policy requirements and procedures on Policies Central for additional information.

If you have any questions regarding this prohibition or any particular payment, contact your local or regional compliance officer, the Compliance department or the Legal department.



# Avoiding Conflicts of Interest



ALL COMPANY PERSONNEL MUST, WHERE POSSIBLE, AVOID SITUATIONS IN WHICH AN ACTUAL OR POTENTIAL CONFLICT OF INTEREST MAY EXIST.

Viatrix personnel have an obligation in all business transactions to place the interests of the company ahead of any personal interests. Viatrix personnel must avoid personal interests that conflict with the interests of Viatrix, or that might influence or appear to influence their judgment or actions in performing their duties. Therefore, all Viatrix personnel must, where possible, avoid situations in which an actual or potential conflict of interest may exist. Furthermore, Viatrix personnel must promptly and fully disclose any actual or potential conflicts of interest that arise to their local or regional compliance officer, or to the Compliance department.

**PLEASE REFER TO THE COMPANY'S CONFLICT OF INTEREST POLICY REQUIREMENTS ON POLICIES CENTRAL FOR ADDITIONAL INFORMATION AND INSTRUCTIONS ON HOW TO APPROPRIATELY DISCLOSE AND RESOLVE AN ACTUAL OR POTENTIAL CONFLICT OF INTEREST.**

Situations that may give rise to a prohibited conflict of interest and for which employees should seek guidance from the Compliance department include, but are not limited to:

- Personal or family business arrangements with Viatrix;
- Diverting corporate opportunities;
- Financial interests in competitors, vendors, suppliers, customers, or partners;
- Outside employment with a competitor, supplier or vendor, or that otherwise conflicts with the employee's performance of their job duties with Viatrix;
- Family member(s) working with a competitor, customer, supplier, vendor, or partner; and
- Service with outside organizations, particularly governmental positions.

# Giving and Receiving Gifts and Hospitality

All business decisions that you make on behalf of Viatris must be based on uncompromised, ethical judgment and be independent of actual or anticipated personal gain. Business decisions include, but are not limited to, procurement of materials, supplies and services, as well as sales terms and discounting decisions. All such decisions must reflect the best interest of Viatris.

Viatris prohibits providing anything of value to a person with the intent of influencing that person's recommendations or purchases of healthcare products or services.

No gifts, meals, entertainment or anything else of value may be directly or indirectly given by Viatris personnel to anyone in violation of applicable law.

Providing gifts, meals or entertainment to healthcare providers is generally discouraged and, where allowed, must comply with applicable law and Viatris policies.



**ALL BUSINESS DECISIONS THAT YOU MAKE ON BEHALF OF VIATRIS MUST BE BASED ON UNCOMPROMISED, ETHICAL JUDGMENT AND BE INDEPENDENT OF ACTUAL OR ANTICIPATED PERSONAL GAIN.**

Viatris personnel may not solicit or request gifts, entertainment or other business courtesies from people or organizations doing business with Viatris.

Occasional, unsolicited gifts and business courtesies, such as meals and entertainment, are permissible if they are customary and common business courtesy; modest, based on local standards; and not excessive in value. In addition, local policies may require advance approval before accepting gifts or other

business courtesies; ask your compliance representative and check Policies Central for specific guidance. No gifts or entertainment may be accepted that would likely or potentially result in an expectation or belief of the creation of a personal obligation, or that could be perceived as influencing your judgment or decision.

Viatris personnel who are in a position to influence or make procurement decisions must be especially cautious about the receipt of gifts that might affect, or appear to affect, their procurement decisions.



# Global Trade Compliance

ALL ACTIVITIES INVOLVING CERTAIN SANCTIONED COUNTRIES MUST BE REVIEWED BY THE COMPLIANCE DEPARTMENT TO ENSURE COMPLIANCE WITH TRADE CONTROL LAWS.

We are all responsible for complying with trade and export control laws, which are complex and may change quickly as governments adjust to new political and security issues. Violations of trade and export control laws and sanctions can lead to significant fines and penalties, both for Viatris and for any individuals involved.

Many countries have trade control laws that govern the import, export or transfer of certain controlled products, software and technology, as well as the performance of certain controlled services. In addition, any trade control laws may restrict Viatris' transactions and business relations with certain countries, entities, organizations or individuals.

Some countries in which Viatris does business have in place restrictive trade practices or boycotts against other countries or groups. Viatris may not engage in agreements, provide any information or take any action that would support such restrictive trade practices or boycotts, if doing so would violate U.S. laws.

Viatris personnel who encounter any of the above subjects in the course of their work for Viatris must be aware of the company's Global Trade Controls Procedure, found on Policies Central, and related procedures. In particular, all activities involving certain sanctioned countries must be reviewed by the Compliance department to ensure compliance with trade control laws.

Any questions about compliance with these laws, or suspected violations, must be directed to the Compliance or Legal departments.



# FAIR COMPETITION, PRICING AND ANTI-TRUST

- Fair Competition

# Fair Competition

Viatriis is committed to compliance with applicable antitrust and fair competition laws. To uphold this commitment, Viatriis personnel shall at all times comply with applicable fair competition and antitrust laws of the countries in which we do business.

Antitrust and fair competition laws and regulations around the world are intended to preserve fair, honest and vigorous competition in the marketplace. Although antitrust and fair competition laws vary from place to place, and some practices that may be allowed in certain places may also be forbidden in others, generally, these laws prohibit (1) agreements between competitors to improperly monopolize or divide markets, control prices, limit production, or otherwise unreasonably restrain trade or engage in unfair business practices, (2) unilateral

conduct that constitutes monopolization, attempted monopolization and abuse of a dominant position in any market, and (3) discriminatory pricing.

Due to the complex nature of antitrust and fair competition laws and regulations and the potential civil and criminal consequences of violating them, Viatriis personnel are required to consult with the Legal department, their local or regional compliance officer, or the Compliance department if they encounter a situation that may implicate any of these laws or regulations.

We must not attempt to improperly obtain or use a competitor's proprietary information. This includes information pertaining to a competitor's prices, bids or proposals in circumstances where there is reason to believe that the release of such information would be illegal or unauthorized.



**VIATRIS PERSONNEL SHALL AT ALL TIMES COMPLY WITH APPLICABLE FAIR COMPETITION AND ANTITRUST LAWS OF THE COUNTRIES IN WHICH WE DO BUSINESS.**



# CORPORATE AND SECURITIES LAW

- Trading in Viatris or Other Company Securities
- Public Disclosures
- External Communications



# Trading in Viatris or Other Company Securities

Viатris personnel are prohibited from buying, selling or trading Viатris securities while they are in possession of material non-public information about Viатris. Viатris personnel are also prohibited from trading in the securities of other companies if they learn of material non-public information about those other companies in the course of their work for Viатris (for example, customers, suppliers, collaboration partners or any other companies with which Viатris does or is considering doing business).

It is irrelevant whether such material, non-public information is the basis for your transaction. Trading while in possession of such information is sufficient for you to be in violation of this code, company policy, and potentially subject to civil and criminal sanctions.

Viатris personnel are also prohibited from causing or recommending that others – including controlled entities, family members or friends – buy, sell, hold or trade Viатris or other company securities if they possess material non-public information.

Please refer to the Global Insider Trading Policy requirements on Policies Central for additional information.



# Public Disclosures

Viatrix is committed to delivering accurate information when communicating with the investment community, regulators, the media and other interested parties, and to making full, fair, accurate, truthful, timely and understandable disclosures in all public reports and filings made pursuant to law or regulation. We are responsible for ensuring that information which will or may be part of a financial statement or related filing is accurate, complete and meets all legal requirements.





# External Communications



Viatrix personnel shall not provide any Viatrix-related information to media representatives or other outside parties without the advance approval of Global Communications. Please refer to the company's External Communications and Engagement Governance Document on Policies Central for direction on how to refer inquiries for an authorized response.



# FAIR EMPLOYMENT PRACTICES

- Employment Practices
- Respect for Privacy and Personal Data Protection



# Employment Practices

Viatriis strives to create a work environment that is productive, healthy, safe and free from unlawful discrimination, harassment and retaliation. Prohibited sexual harassment includes, but is not limited to, unwelcome sexual advances, propositions, requests or demands for sexual favors, and other verbal, visual or physical conduct of a sexual nature. Harassment based on other personal characteristics or traits, such as a person's age, race, color, religion, sex, sexual orientation, national origin, citizenship, marital status, mental or physical disability or handicap, military service or veteran status, or any other characteristic protected by law, also is prohibited. Viatriis is an equal opportunity employer as a matter of law, ethics and good business practice.



# Respect for Privacy and Personal Data Protection



All of our employees and outside parties with whom Viatris has dealings (patients enrolled in clinical trials, medical practitioners, contractors, etc.) are entitled to their privacy. Viatris is committed to protecting their personal data.

“Personal data” means any information that can be used to identify individual, whether directly or indirectly (e.g., name, date of birth, photograph, address, email address, social security or government identifying number).

Personal data protection gives individuals whose data is held the right to control the collection, processing, use, disclosure and storage of data relating to them. This data must be used fairly and for a specific, clear and legitimate purpose, and must only be retained for as long as is necessary for the purpose for which they are processed.

Because data protection and privacy legislation varies from country to country, and because Viatris operates across many locations, Viatris has adopted a Global Privacy Governance Document and Fair Processing Notice, applicable to all our employees around the world. Viatris also has entered into intercompany agreements to ensure appropriate collection, storage, transfer and use of personal data.



# CONCLUSION

- Our Shared Responsibility for Compliance
- Asking Questions and Seeking Information

# Our Shared Responsibility

As employees of Viatris, we are all responsible, individually and together, to ensure good compliance, and to understand and follow the principles set forth in this code.

## To accomplish this, we all must:

- Be familiar with applicable laws and Viatris company policies, and follow them at all times;
- Seek guidance when we have questions;
- Take responsibility and hold each other accountable; and
- Raise concerns, ask questions and take action against improper conduct by reporting it.

## Executives and managers also must:

- Maintain a work environment that encourages open communication;
- Ensure that all personnel under your supervision complete assigned compliance training;
- Be familiar with the resources available to assist in the resolution of legal and ethical questions and concerns; and
- Enhance our culture of compliance by encouraging ethical behavior, setting a strong tone of support for compliance and leading by example.





# Asking Questions and Seeking Information

If you have any questions about this code or its application, or if you encounter or observe any situations that are not addressed by the code or company policy, you are encouraged to contact the Compliance or Legal departments for guidance before taking action.

If you believe that any activity may violate the code, applicable law or company policy, or if you have questions about a particular practice or course of action, you are encouraged to seek guidance first.

