

CODE OF ETHICS FOR CHIEF EXECUTIVE OFFICER, CHIEF FINANCIAL OFFICER AND CORPORATE CONTROLLER

Viatrix Inc. (the “Company”) has adopted this Code of Ethics (this “Code”) for its Chief Executive Officer, Chief Financial Officer and Corporate Controller.

The officers covered by this Code:

- are expected to engage in honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- shall endeavor to make, and to promote the making by others of, full, fair, accurate, timely and understandable disclosure in reports and documents that the Company files with, or submits to, the Securities and Exchange Commission and in other public communications made by the Company;
- should comply with applicable governmental laws, rules and regulations; and
- have a duty to promptly report any violations of this Code to a responsible member of management.

The foregoing are statements of mandatory conduct, and any waiver of, or amendment to, the requirements set forth in this Code will be subject to public disclosure.