

Standards for Interactions with Healthcare Professionals (“Standards”) Policy Summary

Viatrix has developed the Standards to guide Viatrix personnel in their interactions with Healthcare Providers (“HCPs”), Healthcare Organizations (“HCOs”), and Patient Organizations (collectively, the “Healthcare Community”). Our Standards instruct Viatrix colleagues on proper behavior when engaging with the Healthcare Community. They are grounded in company-wide requirements and take into consideration local laws and regulations, including industry codes of conduct where applicable.* Compliance with the Standards is mandatory for all Viatrix colleagues who are involved in any interaction with the Healthcare Community. The Standards apply to any expenditure by Viatrix colleagues, regardless of whether the expenditure is reimbursed by Viatrix.

It is our policy to comply with all applicable laws and regulations relating to the sales, marketing, and product promotional practices of Viatrix. To that end, Viatrix requires that its sales, marketing, and promotional activities be conducted in a manner that furthers patient care and enhances the practice of medicine. This means that our relationships with the Healthcare Community must focus on (1) informing them about products and customer service; (2) providing scientific and educational information; and (3) supporting medical research and education. The following general principles govern Viatrix’ interactions with the Healthcare Community:

- Viatrix encourages ethical business practices and will not use any unlawful inducement in order to sell or to arrange for the recommendation or prescribing of its products.
- At Viatrix, we believe that enduring customer relationships are based on integrity and trust. We seek to gain an advantage over our competitors through superior products, research, manufacturing, and service, but never through improper business practices as described within these general principles.
- 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 Viatrix’ products.
- Viatrix will 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 information and materials provided to HCPs by, or on behalf of, Viatrix must always be consistent with approved product labeling (i.e., “on-label”).

Any member of our workforce who interacts with the Healthcare Community is trained on the Standards. Failure to comply with the Standards may subject the individual to disciplinary action, up to and including termination of employment.

www.Viatrix.com

*Our Standards may differ in accordance with local laws and regulations.