



U.S. Political Activity Policy

ViatriS encourages individual participation in the political process by ViatriS Personnel. ViatriS Personnel may participate in the political process in their individual capacity as they see fit, and make Political Contributions of their own time and money to the Political Candidates and Political Organizations of their choice. This Policy does not restrict Political Contributions made by ViatriS Personnel acting on their own behalf and without utilizing ViatriS' name or resources.

This Policy does, however, apply to Political Contributions made by ViatriS or ViatriS Personnel to Political Candidates, Political Organizations, and/or in support of Ballot Initiatives on behalf of ViatriS, or using ViatriS resources, or in the course of ViatriS Personnel's work for ViatriS. No ViatriS Personnel may make a Political Contribution on behalf of ViatriS, while using ViatriS resources, or in the course of their work for ViatriS except pursuant to the terms of this Policy.

At no time may anyone acting in an individual capacity suggest any form of support by ViatriS or its officers, directors, or employees when engaging in personal political activity, without advance written authorization obtained in accordance with this Policy. This prohibition extends to a broad range of communications, including e-mails and telephone calls transmitted through ViatriS equipment or on ViatriS property and time, and any statements that are made on behalf of ViatriS or using ViatriS' name.

POLITICAL CONTRIBUTIONS BY ViaPAC

In addition to encouraging ViatriS Personnel to participate in the political process in their individual capacity using their own time, resources, and money, ViatriS also supports the establishment of a Political Action Committee (PAC) by U.S. ViatriS Personnel. PACs raise voluntary contributions from a Restricted Class of individuals and use those funds to support Political Candidates and Political Organizations. U.S. ViatriS Personnel have established ViaPAC for this purpose. ViaPAC is a voluntary, non-partisan, employee run political action committee (PAC) established to help elect federal and state policymakers who will best represent the interests of the work of employees at ViatriS.

Consistent with applicable U.S. laws, ViaPAC may contribute to U.S. Political Candidates and Political Organizations whose views and work are consistent with the interests of ViatriS, ViaPAC, and its members. ViaPAC recognizes that Political Candidates and Political Organizations may support positions that align with some, but not all, of those interests. ViatriS will adhere to all applicable U.S. federal and state laws regarding the solicitation, acceptance, contribution, and/or disbursement of funds collected through ViaPAC. Any questions regarding ViaPAC should be directed to the U.S. Government Affairs organization.



POLITICAL CONTRIBUTIONS BY VIATRIS OR IN THE NAME OF VIATRIS

ViatriS does not and cannot make direct Political Contributions to Political Candidates in the U.S. participating in federal elections. However, ViatriS may make certain independent expenditures in connection with federal elections, including those directed at communications advocating the election or defeat of a federal candidate, provided such expenditures comply with all applicable laws and regulations. ViatriS will document any independent expenditures in the Semi-Annual Political Contributions report discussed below or, if no independent expenditures have occurred, ViatriS will document as such.

In certain circumstance, *and only to the extent allowed by law*, ViatriS may directly contribute to non-federal Political Candidates and other Political Organizations whose views and work are consistent with the interests and values of ViatriS, the communities in which it operates, and/or the pharmaceutical industry in general. Any such allowable Political Contribution must be reviewed and/or approved in accordance with this Policy.

PAYMENTS TO TRADE ASSOCIATIONS

ViatriS may also make payments in order to secure membership in Trade Associations that engage in political activity to protect interests relevant to ViatriS, the pharmaceutical industry, and/or the U.S. business climate in general. All payments referenced in this paragraph must be approved in writing in advance by the Head of North America Corporate Affairs or his or her designee.

APPROVAL GUIDELINES FOR POLITICAL CONTRIBUTIONS BY OR ON BEHALF OF VIATRIS

The Head of North America Corporate Affairs shall obtain approval from each of the following: the Head of Corporate Affairs, the Head of North America, and the Global General Counsel for all Political Contributions to Political Candidates or to Political Organizations by ViatriS to ensure such contributions:

- i. comply with all applicable laws and regulations including but not limited to U.S. Federal Election Commission regulations; and
- ii. adhere to this Policy, in addition to ViatriS' Code of Business Conduct and Ethics and applicable ViatriS anti-corruption policy documents.

In determining whether or not to approve a request to make a Political Contribution by or on behalf of ViatriS, approvers may consider a number of factors, including, but not limited to:

- i. ViatriS' interest in supporting the Political Candidate or Political Organization;
- ii. the consistency of the Political Candidate's or Political Organization's views with the interests and values of ViatriS, the communities in which it operates, and/or the pharmaceutical industry in general;



- iii. the value of the contribution to the Political Candidate or Political Organization; and/or
- iv. the appropriateness of Viatris' level of involvement in the Political Candidate, Political Organization, or Ballot Initiative.

Political Contributions by or on behalf of Viatris shall reflect Viatris' interests and shall be made independent of the personal political preference of any Viatris Personnel.

The North America Corporate Affairs organization shall maintain records of all Political Contributions and Trade Association memberships, and shall retain such records in accordance with Viatris Global Policy on Records and Information Management.

VIATRIS DISCLOSURE OF POLITICAL CONTRIBUTIONS, TRADE ASSOCIATION MEMBERSHIPS, AND LOBBYING ACTIVITY

North America Corporate Affairs shall be responsible for preparing a summary of Political Activity that falls within the scope of this policy. This report shall include:

- Political contributions made by Viatris, including any contributions to organizations that are registered and report pursuant to section 527 of the Internal Revenue Code.
- A summary of U.S. trade memberships to which Viatris makes combined payments of \$50,000 or more per year in the form of dues, assessments, and major sponsorships. Viatris shall ask each organization to identify the portion of Viatris' payments that are used for political expenditures or lobbying activities.
- A summary of Political Contributions made by ViaPAC ("the Political Contributions Reports") on a semi-annual basis. The Political Contributions Reports shall be organized according to state (whether the recipient of the contributions seeks federal, state, or local office) and will include the following information as to candidates:
 - i. each candidate's full name;
 - ii. the full name of each candidate committee to which contributions were directed;
 - iii. the state in which each candidate's district is located;
 - iv. the district that each candidate seeks to represent (if applicable);
 - v. each candidate's party;
 - vi. the office to which each candidate aspires; and
 - vii. the aggregate amount of ViaPAC's political contributions for the reporting period.
- In addition to individual candidates for office, the report shall also include contributions made by ViaPAC to Political Organizations, such as leadership PACs or political parties.
- The portions of the Political Activity Report relating to Viatris political contributions and Trade Association memberships shall be presented to and reviewed by the Compliance Committee of the Viatris Board of Directors ("Board") to confirm all relevant activities were made consistent with this policy and relevant and applicable laws and regulations.



Additionally, the Compliance Committee shall annually review this policy to ensure its efficacy. The Viatriis Board of Directors Compliance Committee is comprised entirely of non-employee directors.

North America Corporate Affairs shall be responsible for posting the Political Activity Reports on the Viatriis corporate website on a semi-annual basis. These reports shall be archived on the Viatriis website for a period of 5 years. The Viatriis corporate website shall also include a link to the external websites where Viatriis' quarterly lobbying reports to the U.S. Senate and the U.S. House of Representatives, as required under the Lobbying Disclosure Act of 1995, may be found.

BIENNIAL AUDIT

North America Corporate Affairs shall be responsible for maintaining all records related to political contribution and trade associations activity for the purpose of the biennial audit to ensure compliance with this Policy and in accordance with the Viatriis Global Policy on Records and Information Management.