

Global Sustainability Oversight and Compliance

Global Sustainability Oversight

Viatri's Board oversees management's efforts with respect to sustainability matters through its Governance and Sustainability Committee. The company's sustainability function operates as a center of excellence within the Viatri's Corporate Affairs leadership structure. The Head of Global Sustainability drives the strategic and operational development of sustainability matters across the company, together with key partners. The Chief People and Corporate Affairs Officer reports to the Chief Administrative and Transformation Officer and, together with the Head of Global Sustainability, communicates quarterly with the Board on

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. Our corporate strategy includes doing 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, supply chain, distribution and market outreach and policy engagement. In addition, community engagement and philanthropic donations complement those core activities.

sustainability matters, including corporate environmental and social responsibility matters through the Governance and Sustainability Committee. The Governance and Sustainability Committee reviews progress with the Chief People and Corporate Affairs Officer and Head of Global Sustainability on sustainability matters on an annual basis to confirm the company is tracking its priorities in this area.

The global sustainability function includes members in the U.S. and Europe, with key partners across other functions and geographies. A multifunctional Global 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, including progress on companywide goals and priorities on access to medicines, our people and the environment. 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 regard to sustainability for specific key functions, such as the Sustainable Sourcing Council and others, complementing the advisory 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

How Viatri's Considers Price as Part of Our Commitment to Access

At Viatri's, 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 generics (including complex products), globally recognized iconic brands and an expanding portfolio of innovative medicines. Many of the medicines in our portfolio are not protected by patents and 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, payers and health systems.

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 Viatri's does business while simultaneously advancing 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

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 Viatris Board's Compliance and Risk Oversight Committee regarding enterprise risk, as well as other appropriate Board committees regarding risk-related matters. The Compliance and Risk Oversight Committee also reviews significant global compliance-related policies relating to pricing and/or commercialization of the company's products and services, among other oversight responsibilities.

Viatris' enterprise risk management (ERM) framework acts as a centralized lens to view risk throughout the organization. This provides enhanced visibility to Viatris' management on how the organization is managing risk and monitoring opportunities. The company's ERM framework is supported by multiple functional areas, including, among others, Internal Audit, Information Technology, Information Security, Compliance, Corporate Affairs, Supply Chain, Research & Development, Commercial, 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 and cybersecurity.

Our Internal Audit function coordinates cross functionally to maintain the company's enterprise risk assessment, including the identification of key and emerging risks, and reviews and refreshes this analysis quarterly with executive management. For each key or emerging risk identified, the company establishes risk monitoring ownership, from which quarterly updates are collected for executive management and the Viatris Board's Compliance and Risk Oversight Committee.

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

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

Internal Audit

Global Internal Audit strengthens Viatris' ability to create, protect and sustain value by providing the Board and management with independent, risk-based, and objective assurance, advice, insight, and foresight. Internal Audit is guided by the Global Internal Audit Standards as promulgated by The Institute of Internal Auditors. Independence is maintained through Internal Audit's reporting relationship directly to the Audit Committee of the Board of Directors. Internal Audit maintains an audit plan outlining risk-based assurance activities in the following program areas: internal controls over financial reporting, compliance and/or operational activities and information technology. The audit plan also includes other special projects based on specific organizational risks and/or requests and is augmented by an analytics and continuous monitoring platform. The group supports the Company's enterprise risk management activities and collaborates closely with other enabling functions including Finance, Compliance and Legal.

Information Security

Viatris operates in a complex and rapidly changing environment that involves many potential risks, including AI, IT and cybersecurity risks. AI-enabled social engineering and fraud, increased third-party concentration, and cyber threats to operational technology and manufacturing environments are among the emerging risks that could disrupt production and compromise data integrity. Risk management is an enterprise-wide objective and is subject to oversight by the Viatris Board and its committees. We have a cybersecurity 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 Global Security organization consists of a global internal team of certified subject matter experts in cybersecurity, risk management, supply chain cybersecurity, incident response, access and application security, awareness and training and security operations. Key aspects of the cybersecurity program are also provided by third-party managed security providers, including first- and second-line support for incident response and the company's vulnerability assessment process.

The Global Security team is responsible for defining and overseeing the execution of the Company's cybersecurity program and strategy. The Viatris IT team, led by the Chief Information Officer, is responsible for ongoing security operations such as maintaining firewalls and patch management. In addition, the delivery of many cybersecurity programs relies on IT resources to execute the selection, delivery and implementation of security solutions, such as identity and access management, end-point protection and end-of-life protocols.

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.

Viatrix' senior leadership is updated on our cybersecurity posture and emerging risks on a quarterly basis. Specifically, our Chief Information Security Officer & Head of Global Security and Chief Information Officer report quarterly an internal risk committee of senior management, which includes the CEO, CFO, Chief Legal Officer, Chief Administrative and Transformation Officer, Chief People and Corporate Affairs Officer, Chief Information Officer, Chief Compliance Officer, Chief Supply Officer, Chief R&D Officer and Regional Presidents, as well as the Viatrix Board on the progress of the cybersecurity program and overall security status.

Hacking Precautions and Training

Viatrix maintains a cybersecurity program aligned with the National Institute of Standards and Technology (NIST) Cybersecurity Framework, designed to govern, identify, protect, detect, respond to and recover from cybersecurity threats. Viatrix' cybersecurity program includes policies, procedures, cybersecurity awareness communications, testing and training for employees (with mandatory training for system users); as well as system monitoring, risk reduction, vulnerability and patch management and monitoring external threats.

As part of its cybersecurity program, Viatrix has adopted a Cybersecurity Incident Response Plan (CIRP) to establish a guide for leadership and incident response stakeholders through cybersecurity incidents (as defined in the CIRP). The CIRP is managed by the Viatrix Global Security team and their managed security

providers is reviewed at least annually, tested through semi-annual technical exercises and periodically evaluated through executive tabletop scenarios.

The CIRP provides an overview of critical actions throughout the incident response lifecycle, including a severity matrix that guides communication, escalation protocols and decisions on engaging a third-party incident response vendor.

Viatrix' Cybersecurity Incident Response Team (CIRT) reports to the Chief Information Security Officer & Head of Global Security and has responsibility for investigating and executing incident protocols, determining potential impacts, notifying appropriate parties and assessing the need for third-party assistance. Critical incidents require implementation of the global crisis plan and high severity incidents require notification to the executive leadership team once such an incident is confirmed.

Viatrix participates in several industry and third-party threat monitoring and information-sharing services, providing insights into vulnerabilities and threats that are incorporated into our security operations and IT remediation.

Global Privacy Governance

In response to the growing landscape of global data privacy laws, including in key Viatrix geographies such as Europe, India and the United States, Viatrix is committed to protecting information relating to identified or identifiable natural persons (personal data) collected and processed during the course of business activities. Additionally, Viatrix recognizes an additional 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 or minimal regulatory requirements regarding the management of personal data.

Using Artificial Intelligence Responsibly

Artificial Intelligence (AI) holds transformative potential for the pharmaceutical industry, promising to facilitate everything from drug discovery and clinical trials to regulatory approvals and patient engagement. Viatrix' Information Technology (IT) team is collaborating across the company to explore AI's potential use and establish guidelines for its responsible use within the organization.

We are leveraging AI's capabilities to drive smarter decision-making, boost productivity and transform the ways we work, including through chatbot-style generative AI solutions and an AI-enabled document translation tool.

We recognize that while AI tools offer numerous benefits, they also come with potential risks. The Viatrix IT Emerging Technology team, Global Security, and Global Privacy provide colleagues with guidance on the safe, effective, and compliant use of AI tools across the company. Viatrix has a central governance and oversight board that provides strategic direction and oversight of the management of AI and risk management. We work to ensure we are using AI tools responsibly and securely by protecting sensitive data, verifying information, being aware of biases, using strong security measures, and staying informed.

To keep Viatrix data safe, any new technology, including AI, must undergo technical reviews, compliance checks and governance reviews, and comply with existing policies and procedures. We use a risk-based governance approach for the development, procurement and use of AI solutions, including documented risk assessments, defined accountability, and ongoing monitoring of evolving regulatory requirements. This approach is supported by role-based training for employees who build, procure or use AI tools so they understand AI capabilities, limitations and potential harms and can apply appropriate safeguards in practice. This helps ensure compliance with applicable regulations while maximizing AI's potential and safeguarding our data.

Viartis demonstrates this commitment to data privacy laws and its obligation to individuals with the implementation of a global privacy program. The Viartis Global Privacy program reports regularly to the Compliance and Risk Oversight Committee of the Viartis Board and is responsible for the development, implementation, maintenance and adherence to the company's data privacy policies and procedures and applicable data privacy laws and principles. All company personnel receive annual data privacy training and are required to adhere to and comply with these data privacy policies and procedures and with applicable data privacy laws. 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 Viartis 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, 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 Viartis. The Viartis Employee Fair Processing Notice was updated and communicated to all employees in 2025 with a core privacy notice for all employees launched with regional or local supplemental notices designed to provide additional information required by each jurisdiction.

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;
- Risk assessment and management, monitoring, and audit;
- Privacy and data protection due diligence for third parties, including vendors and HCPs, and in connection with distribution arrangements and acquisitions;
- Appropriate and compliant responses to an individual's privacy rights requests;
- 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 Viartis 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

Viartis' 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 Viartis Board's Compliance and Risk Oversight Committee and the Chief Legal Officer. The Compliance and Risk Oversight Committee makes recommendations to the Viartis 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 also covered within the Code of Business Conduct and Ethics.

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 (COEs). 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.

We engage an independent review of the effectiveness of our Compliance program at least every five years. Additionally, we seek independent review of various aspects of the program more frequently.

In 2022, Viartis employed a third-party to conduct an effectiveness assessment review that resulted in no major findings. The assessment concluded that Viartis' Compliance department had implemented significant enhancements to all areas of its program since the formation of Viartis. In assessing and comparing Viartis' Compliance Program against industry regulatory requirements and leading practices, the third party concluded the Compliance Program is meeting its obligations to detect, prevent and mitigate compliance risk.

A direct report to the CCO leads five global COEs. A senior compliance leader manages each respective center of excellence, which focuses on the following:

- Policies, training and communications;
- Investigations;
- Compliance analytics;
- Risk, due diligence and transparency; and
- Commercial innovation, Medical Affairs, R&D and global trade controls.

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 Antitrust;
- Corporate and Securities Laws; and
- 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 landscape across Viatris, further expanding the Global Compliance Risk Assessment and Monitoring Program into additional countries and furthering our data analytic capabilities. In 2025, we completed implementing Risk Assessment and Monitoring activities in all regions and updated our risk assessment questionnaire to reflect policy and regulatory requirements.

In 2024, we implemented emerging technology and artificial intelligence to improve adherence to Compliance policy requirements by launching a new tool featuring “chatbot” style policy search functionality in limited regions with testing in North America and JANZ. In 2025, we made enhancements to the effectiveness of the chatbot and expanded scope applicability to cover all regions except Europe and China with a new global Compliance ChatViатris version of the chatbot. In early 2026, we plan to complete implementation of this technology in both Europe and China.

In 2025, we transitioned to a new third-party Compliance Line partner to better align with the ways we communicate today. This innovative platform offers translation, anonymized recording (where permitted by law) to submit concerns verbally and other modern features. For example, the web platform has been greatly enhanced to enable better communication between reporters and the Investigations team. Leveraging AI capabilities, automatic translation is built in to allow for clear communication between the participating parties. It remains a secure, confidential reporting system, which allows colleagues to easily submit concerns about actual or suspected misconduct. They can continue to speak up with confidence because our policy states that no form of retaliation will be tolerated for anyone reporting a matter in good faith. We delivered an awareness campaign to promote the variety of options for colleagues to report compliance matters, as well as to emphasize

Viатris’ strong stance on no retaliation for reports made in good faith.

We created a new Reporting Matters Resources space on the Compliance Hub on our intranet featuring useful resources to help colleagues learn more about reporting compliance matters and the role each of us plays in upholding Viатris’ standards. We have also highlighted this as an option to ask about on the homepage of our Compliance chatbot.

Key activities in 2025 included:

- Enhanced and continued our Compliance Champion Series which features two colleagues each quarter from a different region. These stories focus on colleagues from various functions and business areas to explain how the Compliance team has impacted their work and enabled them to make an Impact via Integrity.
- Implemented significant enhancements, including the hiring and reorganization of staff, implementation of new COEs, establishment of new harmonized processes, policies, procedures and systems, and establishment of strong support and tone at the top across all regions and leadership levels.
- Enhanced our Global Due Diligence SOP and supporting Due Diligence Questionnaire in collaboration with the Global Internal Audit team and regional Compliance and Legal teams. We’ve also established a new Global Due Diligence training.

Our new Analytics COE develops data analytic dashboards to highlight specific compliance risks and identify areas for investigation and remedial efforts.

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 Viатris, 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 potential non-compliance associated with 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 reviewed by

a centralized team. 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 2025, Viatris continued to evolve data analytic and monitoring capabilities as well as field- and headquarter-based activities.

Management of Suspected Incidents

We take all allegations of conduct that is potentially 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 Risk Management Team (RMT) and the Compliance and Risk Oversight Committee of the Viatris Board on a regular cadence.

If any Viatris 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 Viatris Code of Business Conduct and Ethics.

Nurturing the Culture of Compliance

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

We have 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.

We have continued to further embed ethics and integrity into the business and mindset via quarterly leadership Compliance-related messaging, to enhance the "tone from the top." We also have begun leveraging emerging technologies to develop Compliance resources on key topics.

Looking to 2026, this is a major component of how we will raise awareness on key Compliance topics for colleagues at the global, regional and local levels.

Training and Education

We require all employees to complete regular training in regard to the Code of Business Conduct and Ethics, which includes information on Fair Competition and Anti-Corruption, among other topics. The rolling completion rate in 2025 was 94%.

We also require specific training courses for individuals based on their functions, including the company's Standards for Interactions with HCPs and the Healthcare Community for employees with relevant job responsibilities. Other 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 HCPs receive additional, focused training related to Standards for Interactions with HCPs from their local Compliance partner(s). Our Standards for Interactions with the Healthcare Community instruct employees on proper behavior when engaging with HCPs and the healthcare community. 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.

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.

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

Reporting Compliance Concerns

We encourage open communication on any concerns, provide a variety of channels for reporting potential compliance violations, and strictly prohibit retaliation relating to any reports made in good faith. 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. These channels are available to receive reports of suspected issues on a variety of topics, which will be triaged accordingly. The Compliance Line is available 24/7 and permits anonymous reports in all 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.

If any Viatris 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 Viatris Code of Business Conduct and Ethics.

The Compliance Line is available 24/7 and permits anonymous reports in all countries, where permitted by law. The Compliance Line is made available to all external and internal stakeholders on [viatris.com](https://www.viatris.com).

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 details 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 and Other Reported Matters confidential 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 and to help ensure that good-faith reporters do not suffer negative employment actions as a result of their allegations. If any Viatris colleague believes that they or other Viatris colleagues have been retaliated against for reporting a matter pursuant to the Governance Document and the Viatris 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 new 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

Viatris' 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 that are designed 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.

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.

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 is required by the Viatris 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 Viatris.

Third-Party Due Diligence

Viatris' third-party due diligence program is global in scope, managed by a dedicated team. As noted above, due diligence reviews must be performed whenever Viatris enters into certain potentially high-risk contractual agreements with third parties. The process involves an assessment of any issues including investigation and clarification of discovered legal, civil and reputational allegations or convictions (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;
- Divestitures;
- Other strategically important deals;
- Global Trade Sanction screening and risk mitigation; and
- Restricted party screening under the global trade control procedure.

Our due diligence process policies clarify requirements and educate employees on their responsibilities. Looking forward, we will continue to enhance 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 Viatris' 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 HCPs and the Healthcare Community is available on the Viatris 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. We continue the work 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.

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

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 are designed 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.

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.

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 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, labor, 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. Human rights topics are 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 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. Internal and external stakeholders are encouraged to use the Viatris Compliance Line, available on the Viatris corporate website, to report any concerns or potential violations with regards to labor and human rights. For more details on the Compliance line, see [here](#).

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
- Wages
- Working hours
- Preventing harassment
- Privacy
- Product Security and Falsified Medicines
- Recruitment practices
- Safe and healthy working conditions

Policies addressing different relevant human rights aspects include:

- Code of Business Conduct and Ethics
- Global Policy on Bribery and Anti-corruption
- Supplier Code of Conduct
- Policy Statement Regarding Slavery and Human Trafficking
- Global Policy on Combatting Human Trafficking in Persons
- Global Policy on Equal Opportunity and Inclusion
- Global Policy Prohibiting Discrimination, Harassment and Retaliation
- Global Health and Safety Policy
- Environmental Stewardship Policy

We continue to review our company policies, governance structures and procedures related to monitoring and managing human rights. We will assess human rights-related topics 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.

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 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.

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

Viатris Inc. is a publicly traded company listed on NASDAQ and incorporated in Delaware. The Viатris Board of Directors is responsible for oversight of the company and its management. Viатris' Board has established seven standing 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. Viатris 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.

The Viатris Board's Compliance and Risk Oversight Committee oversees the company's global policies and procedures for corporate political lobbying expenditures.

Viатris' U.S. Political Activity Policy is available on [Viатris.com](#).

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