

## CSR OVERSIGHT AND COMPLIANCE

### CSR Governance

Viatri's Board of Directors (Viatri's Board) oversees management's efforts with respect to CSR through its Risk Oversight Committee. The CSR function operates as a center of excellence within the Corporate Affairs leadership team. The head of CSR Development and Operations drives the strategic and operational development of CSR across the company together with key partners. The Head of Corporate Affairs reports directly to the CEO and communicates quarterly with the Viatri's Board through the Risk Oversight Committee. The global CSR function includes teams in the U.S., Europe and India with additional partners across other geographies.

A multifunctional CSR Advisory Committee comprised of global leaders convenes monthly and monitors the progress and supports the integration of CSR initiatives across the organization. Progress on strategic focus areas and execution of relevant tasks rely on a broad and engaged network of functional leaders across the company. Additional monthly and quarterly structured forums, addressing areas of focus with regards to CSR and sustainability for specific key functions, complement 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 and employees implement and administer risk 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 Viatri's Board's Risk Oversight Committee regarding enterprise risk, as well as the other committees regarding risk-related matters within the scope of their oversight responsibilities. Global Internal Audit and Global Compliance report into the Audit and Compliance committees of the Viatri's Board, respectively.

The company's enterprise risk management (ERM) and business crisis management processes and associated programs are supported by multiple functional areas, including, among others, Global Internal Audit, Global Information Technology, Global Information Security, Global Compliance, CSR, Global EHS, Global Security, Finance, Legal, Quality and Product Safety. Other stakeholders support the company's ERM activities as needed. These programs are designed to support the business and ensure that the company is prepared to respond to a variety of events

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

At Viatri's, we provide a portfolio of more than 1,400 approved molecules for patients across a broad range of major therapeutic areas, spanning both noncommunicable and infectious diseases. Our global portfolio includes best-in-class, iconic brand-name products as well as global key brands; generics, including branded and complex generics; and biosimilars. Many of the medicines in our portfolio are not protected by patents and therefore 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 and providers as well as current economic indicators.

Ensuring 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 sustaining our ability to consistently provide patients with a reliable supply of the quality products they need. We are uniquely positioned to provide holistic solutions for governments, NGOs and health systems globally as we partner to connect more people to products and services.

that may adversely impact it, such as unrest/conflicts, legal or regulatory matters, supply disruptions, pandemics, environmental events — including those related to climate change (e.g., flooding, drought, extreme temperatures, severe storms or other significant business interruptions).

By embedding our ERM processes into the company's strategic planning process, we seek to optimize our ability to identify risks, while also identifying and leveraging opportunities. We conduct periodic enterprise risk assessments to identify key and emerging risks. The ESG priority assessment informs the periodic enterprise risk assessment. For each key and emerging risk identified, we have a process to establish risk ownership and evaluate risk mitigation activities. We continue to expand the use of key risk indicators to enhance our ability to evaluate risk mitigation activities and as a tool for risk monitoring and reporting.

As we continue to expand into new geographies — potentially with different risk profiles — safeguarding integrity in business conduct and our assets is critical. We have well-established procedures to identify, manage and monitor risks as part of expanding our business. Risks associated with expansion into new geographies and other outputs of our ERM program are leveraged by Global Internal Audit in determining areas over which it will perform audits.

In connection with its oversight responsibilities, the Compliance Committee of the Viatris Board reviews significant global compliance-related policies relating to pricing and/or commercialization of the company's products and services, among other oversight responsibilities.

### Global Privacy Governance

The company is committed to protecting the information relating to identified or identifiable natural persons (Protected Data). The Viatris Privacy Notice (Privacy Notice) describes our collection, use, disclosure and retention of Protected Data in relation 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 calling us, or by mail, and otherwise during the operation of our business. The Privacy Notice also explains the ways in which, under applicable laws, a person can control the processing of their Protected Data and exercise other rights.

All company personnel are required to adhere to and comply with applicable company policies and procedures. Should applicable data protection laws or regulations provide for more stringent requirements than specified in our governance documents, those applicable data protection laws and regulations govern.

The company monitors, investigates, and responds to suspected and/or confirmed Protected Data incidents as required by applicable data protection laws and in proportion to the nature, extent, and sensitivity of the Protected Data.

The Head of Global Privacy oversees all ongoing activities related to the development, implementation, maintenance, and adherence to the company's policies and procedures relating to Protected Data.

Key areas within Global Privacy Governance include, but are not limited to:

- Employee training;
- Aligning the company's practices and procedures with all relevant local, regional, national, and international laws and regulations;
- Overseeing the revision and negotiation of privacy agreements and privacy terms;
- Privacy and data protection due diligence for third parties, including vendors and HCPs, and in connection with distribution arrangements and acquisitions;
- Ensuring appropriate and compliant responses to individual's privacy rights requests;
- 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.

### Information Security

We have an information security strategy which focuses on implementation of effective controls, procedures, and training on decreasing risks, increasing information security maturity, improving security capabilities and secure partnership enablement.

Our Information Security organization consists of an internal team of certified subject matter experts in the areas of information security risk management, supply chain information security, incident response, security operations, access and application security, education and awareness and security operations. The team is supplemented by a 24/7 managed security service provider that serves as the initial point of contact globally for security monitoring, incident response and vulnerability management.

The Viatris leadership team is updated as needed or on a quarterly basis regarding the status of the overall cybersecurity program, emerging external and internal risks and key risk indicator performance. The Chief Information Security Officer and Chief Information Officer reports bi-annually to the Risk Oversight Committee of the Viatris Board regarding our information security program and performance.

Sources | For more detailed information about the risks and uncertainties associated with our business activities, see our Annual Report on Form 10-K for the year ended Dec. 31, 2021

As part of our multi-year information security program, we focus on seven key threat areas: malware, hacking, social, physical, misuse, accidental and environmental. Across each of these seven areas, we have comprehensive policies and procedures in place to identify and mitigate risks as well as train employees. In addition to internal experts, we utilize third parties for management, controls and audits. Depending on the asset risk profile, testing is conducted on a quarterly basis. Our control procedures are designed to support a remote-flexible work environment.

### Protections Against Hacking

We run a security monitoring program in partnership with an external managed security service provider. We employ multifactor authentication and certificate-based encryption for all external access and authenticated connections. Vulnerability management and patch management processes are in place to reduce the overall threat landscape. The network is monitored 24 hours a day, seven days a week, and 365 days a year using industry best practices, tools and processes. Penetration testing is conducted quarterly by internal and third-party resources based on asset risk. Cybersecurity simulations, including tabletop exercises, are executed to test the company's procedures and the internal team's ability to detect, respond and recover in the event of an attack. Our standards and policies are reviewed on an annual basis by a third party.

As part of continuing to improve our overall information security capabilities, we focus on addressing all areas of the National Institute for Science and Technology (NIST) Cybersecurity Framework: Identify, Detect, Protect, Respond, and Recovery. Every two years, we conduct an information security benchmark using the Information Security Forum's (ISF) assessment tool. In addition to the overall risk mitigation program, we carry a multitiered cyber insurance policy.

### Cultivating Good Conduct and Compliance

Everyone in the company — and those acting on our behalf — are personally responsible and accountable for the company's reputation and dedication to doing business with integrity. We implement robust policies, procedures, and associated training to support that individual responsibility.

### Organization

The 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 Viatris Board's Compliance Committee and the Chief Executive Officer.

The Compliance Committee makes recommendations to the 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, and legal rules and regulations. This includes topics such as Anti-Corruption and Fair Competition, which are 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 (CoE). 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. A direct report to the CCO leads three global CoEs that are anchored by our Global Compliance Service Hub and that support the company's global operating regions and business. A senior compliance leader manages each respective CoE, which focuses on policies, training and communications, risk assessment and monitoring, due diligence, and investigations.

Areas of focus in Viatris' global compliance framework include:

- Raising Concerns
- Operational Compliance
- Fraud and Corruption
- Fair Competition, Pricing, and Anti-trust
- Corporate and Securities Laws
- Fair Employment and Data Privacy Practices

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To reinforce our commitment to compliance, in 2021 we:

- Continued to harmonize compliance-related topics into a unified policy landscape for Viatri
- Continued to implement an effective, comprehensive and consistent Global Compliance Monitoring Program to improve risk-management capabilities
- Further enhanced our compliance investigations process in consideration of company requirements as well as evolving laws and regulations

We also established a Global Compliance Service Hub in India, which includes the following key elements:

- Enhanced management of Trade Control Risk
- Mergers & Acquisitions Due Diligence under the direction of global leadership
- Updated the current system for Transparency Reporting

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.

As part of reinforcing the culture of compliance in the continued integration, during 2021, we implemented a Global Compliance Campaign to further underscore how our commitment to ethical standards and robust compliance helps to support our mission and is vitally important to the patients who use our products. The Global Compliance Campaign addressed compliance-related tools, leadership messaging and training, among other activities. In addition, our CEO and CCO held virtual town halls, together with regional compliance leaders and compliance champions across our global footprint. Looking to 2022, an external assessment of the Viatri global compliance program is planned.

### Training and Education

We require and provide dedicated training on anti-corruption, fair competition and the company's Standards for Interactions with HCPs, for employees with relevant job responsibilities. We also require specific training courses for individuals based on their function. Examples include:

- Vendors that may interact with government officials on our behalf also receive anticorruption training.
- Depending on their role, part-time employees and contractors are required to take subsets of the trainings listed above.

- Employees who deal directly with the government receive additional, focused training related to Standards for Interactions with HCPs from their local Compliance partner(s).
- Established regional investigation committees to streamline the compliance investigations process while building efficiencies, aligning to the commercial segments and creating transparency and partnership with key stakeholder functions.

In addition to comprehensive training in relevant areas in which an employee may work, we require employees to complete regular trainings in regard to the Code of Business Conduct, Fair Competition an Anti-Corruption, among other topics, and track completion rates. In 2021, the completion rate for Code of Business Conduct and Ethics training was 97%.

### Fighting Corruption and Promoting Fair Competition

The company's 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.

A few highlights:

- 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 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 any case of suspected conflict of interest. Each identified case is investigated and if concerns remain after investigation, actions are taken as appropriate.

We provide several options for personnel to submit concerns or seek guidance: either online or via telephone, mail or email. Colleagues can also to reach out to their manager, specific departments, their local compliance support, or use the Compliance Line.

As part of the company's ERM program, Internal Audit assesses anti-corruption and anti-fraud management over entities throughout the world from a corruption risk perspective.

Size (the number of people and 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. Our procedures also address our business partners. In 2021, we continued updating local risk assessments based on development of the business and compliance risks globally.

### 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 partners operating in high-risk areas (whether geographic or subject matter), noted during the business contract drafting and approval process, are subject to a risk review based on a robust due diligence process including investigation and clarification of discovered legal, civil and reputational allegations or convictions.

Anti-corruption language is 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.

### Reporting Compliance Concerns

We encourage open communication, 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.

The Compliance Line is available 24/7 and permits anonymous reports in all countries in local languages where permitted by law. In addition, colleagues can report a concern through the online web portal located on the Company's intranet.

For investigating, resolving and remediating reported events, our Global Policy on Reporting and Investigating Compliance Related Matters requires thorough, timely, and impartial investigation of reported concerns in coordination with the Human Relations team as well as Legal and other functions as appropriate, and fair and consistent disciplinary measures when appropriate.

The policy is available to all employees on the company's intranet. Every effort will be made to keep reports of CRMs and ORMs confidential to the extent possible, consistent with the need to conduct an adequate investigation and in accordance with any applicable local law. 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.

### Responsible Marketing and Promotion

Our colleagues often interact with members of the healthcare community as part of their efforts to educate 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 HCPs instruct employees on proper behavior when engaging with HCPs. 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. Additionally, employees are trained in the company's Code of Business Conduct and Ethics, which also addresses interactions with HCPs.

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. Our policies are consistent with regulations and adhere to ethical standards set forth by the company and industry associations.

The Global Policy for the Marketing and Advertising Review Council requires the establishment of local procedures to ensure that all promotional materials and other commercial communications are reviewed and approved internally by appropriate subject matter experts.

- The goal of the local review procedures implemented under the policy is 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 robust review processes, risk assessments and compliance monitoring as part of the company's compliance program and enterprise risk management.

Promotional activities and materials must never involve promotion of drugs for off-label indications, uses, doses or populations.

### 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 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 directly 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 in providing patients access to high quality medicine.

All political contributions are required to be made in accordance with relevant local laws. 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. The Viatris Board's Compliance 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.

## Respecting Human Rights

As a participant in the UN Global Compact, we recognize our responsibility to support and promote the protection of human rights within and beyond our own operations. We do so through our core business and in how we conduct ourselves in our dealings with partners. We are committed to the Ten Principles of the UN Global Compact and respect the International Bill of Human Rights and the Fundamental Conventions of the International Labour Organization.

The company's global policies and associated procedures, employee and partner training and due diligence are the foundation of our work to mitigate the risk of human-rights violations.

Topics relevant to human rights are addressed through a variety of company policies, including our Code of Business Conduct and Ethics, Supplier Code of Conduct, Policy Statement Regarding Slavery and Human Trafficking, Global Policy on Combatting Human Trafficking in Persons, Policy on Diversity and Inclusion and the Global Policy Prohibiting Discrimination, Harassment and Retaliation as well as the companywide EHS program.

Examples include:

- freedom of association
- prohibition of trafficking of persons
- prohibition of forced and child labor
- handling of identity and immigration documents
- wages
- working hours
- safety in the workplace
- preventing harassment
- recruitment practices

## Honoring Our Commitment as a Publicly Traded Company

Viatrix Inc. is a publicly traded company listed on NASDAQ and incorporated in Delaware. The Viatrix Board of Directors is responsible for oversight of the company and its management. Viatrix' board has established eight committees, each of which operates pursuant to a written charter. Certain of the directors' duties, rights and responsibilities are detailed in the company's Certificate of Incorporation, Bylaws and committee charters, among other governance documents. Viatrix 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.