

Viatriis Comprehensive Compliance Program (“CCP”)

Introduction

At Viatriis, we are strongly committed to empowering people worldwide to live healthier at every stage of life. We do this by following the highest ethical practices and regulatory adherence as the cornerstone of our operations. Our Comprehensive Compliance Program (“CCP”) is designed to ensure that every aspect of our business, from research and development to marketing and distribution, adheres to the highest of standards of integrity and legal requirements. The Compliance Program at Viatriis is built on a foundation guided by the “Healthcare Compliance Program Guidance for Pharmaceutical Manufacturers” developed by the Office of Inspector General (the “OIG Guidance”).

By fostering a culture of compliance, we aim to protect patient safety, maintain public trust, and uphold our reputation as a leader in the pharmaceutical industry. Everyone within Viatriis and those acting on our behalf are personally responsible and accountable for acting in a manner that reflects our commitment to doing business with integrity. Our Compliance Program features robust policies, procedures and associated training to support that individual responsibility.

In accordance with the requirements of California Health & Safety Code §§ 119400-119402, we have established an annual aggregate dollar limit of \$1,500 for certain transfers of value to individual medical or healthcare professionals licensed in California. We include in this dollar limit the value of educational items and meals provided to healthcare professionals in connection with business and educational discussions with those individuals. The following expenses are exempt from consideration in calculating those limits:

- Drug samples given to healthcare professionals;
- Compensation reflecting fair market value for legitimate services provided by healthcare professionals;
- Financial support for health-related educational grants;
- Funding for ongoing educational forums in the medical field;
- Educational materials and resources that inform healthcare professionals about products, support medical research, or help to improve knowledge of a health condition or disease; and
- Items of low value mainly related to healthcare professionals’ education.

The following is a summary of the elements of Viatriis’ Compliance Program:

Compliance Leadership

- Chief Compliance Officer: 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 Viatriis Board of Directors Compliance and Risk Oversight Committee and the Chief Legal Officer.
- Compliance and Risk Oversight Committee: The Viatriis Compliance and Risk Oversight Committee makes recommendations to the Viatriis Board of Directors 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.

Standards, Policies, and Procedures

With the aim to further solidify the implementation and execution of our Compliance Program, Viatriis possesses a comprehensive set of standards, policies, and procedures. While some of these documents are global, some policies and procedures may be relevant only to certain roles, functions, or locations.

Additionally, Viatriis has adopted the limitations outlined in the PhRMA Code, which states that pharmaceutical companies shall declare any limits on gifts that may be offered to medical and/or healthcare professionals.

Training and Education

Viatriis' global Compliance hub is an internal repository where employees have access to compliance resources such as policies, procedures and training materials. We require and provide dedicated training on relevant topics, including but not limited to anti-corruption, fair competition, and the company's Standards for Interactions with the Healthcare Community for employees with relevant job responsibilities. We also require specific training courses for individuals based on their functions. In addition to this comprehensive training, we require employees to complete regular trainings in regard to the Code of Business Conduct and Ethics and the topics mentioned above. Trainings are periodically updated to reflect any relevant changes. Employees are notified of changes and are required to retake trainings every time new substantial changes are implemented.

Effective Lines of Communication

We always encourage open communication and provide our employees with a variety of channels for them to report potential compliance violations. These channels include Viatriis' Compliance Line, a reporting mechanism where employees can report anonymously (where permitted by law) if they choose. It is the duty of all Viatriis employees to take action upon becoming aware of a potential compliance issue. They are always encouraged to speak up if they witness or suspect that any wrongdoing or unethical conduct has or may occur. Colleagues can consult various compliance resources, access local compliance contacts, and view communications through the Compliance hub.

Auditing and Monitoring

Viatriis' longstanding commitment to doing business with integrity is aided by a periodic assessment of the compliance risks the organization faces. These assessments aid in the development of the monitoring program (both live-monitoring and data-monitoring) which effectively pinpoints risk areas where controls are necessary to detect and mitigate risks. Monitoring includes data analytics and live-monitoring to identify potential deviations from Viatriis Policies and Procedures, including those related to HCP interactions, and remediate as appropriate.

Corrective and Preventative Actions

We take all allegations of misconduct seriously. All reports received will be reviewed and investigated, as appropriate, in accordance with the company's policy requirements for reporting and investigating matters. When an allegation is received, a preliminary analysis is promptly conducted to determine the most appropriate review. As part of the investigation, a potential root cause is examined, and remedial actions are implemented to prevent recurrence of a similar issue, as appropriate.

Compliance Program Updates

Viatrix' Compliance Program may occasionally be amended, altered or revised as needed and without prior notice. Pursuant to the requirements of California Health & Safety Code, Section 119402, Viatrix shall make conforming changes to its CCP to align with any updates or revisions made to the OIG's "Compliance Program Guidance for Pharmaceutical Manufacturers".

To obtain a written copy of this Comprehensive Compliance Program description, please call toll-free 866-788-7044 or make an [electronic request](#).