

Global Anti-Corruption Policy Summary

Viatris strictly forbids bribery and corruption in any form, anywhere we do business. Viatris is committed to implementing and enforcing effective compliance systems to prevent and detect bribery and corruption, and to taking prompt and effective remedial action as may be required. We prohibit offering, promising, making, accepting, soliciting, authorizing or providing, directly or indirectly, any payments, gifts, or anything of value to any person for the purpose of corruptly or improperly influencing or rewarding any action, inaction, or decision by such person, or for the purpose of obtaining, retaining, or securing an improper business advantage. This prohibition extends to bribery of government officials, both foreign and domestic, and to bribery of individuals or organizations operating entirely in the private sector. Viatris also prohibits facilitation payments, even in nominal amounts, made to government officials to expedite or secure routine, non-discretionary actions, such as processing visas, licenses or permits. This prohibition does not include official application fees or assessments charged by and payable to an agency or bureau.

All Viatris personnel are required to comply with all applicable laws, including the U.S. Foreign Corrupt Practices ("FCPA"), the United Kingdom's Bribery Act of 2010 ("UKBA"), the Organisation of Economic Co-operation and Development ("OECD") Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, and all other national and local anti-corruption laws in force wherever we conduct business. This also includes keeping accurate accounting books and records as well as maintaining a system of internal accounting controls to ensure that all transactions are properly authorized and recorded. All Viatris personnel have the personal responsibility to understand and abide by the Company's Global Anti-Corruption Policy and all related policies and procedures (including guidelines on acceptable behavior) that form a part of our anti-corruption compliance program,. Moreover, all Viatris personnel, including agents of the company, who are assigned anti-corruption training must complete the training within the required time frame.

Failure to comply with the terms of these policy documents may subject the individual to disciplinary action, up to and including termination of employment.

Viatris personnel must raise any question, doubt, or concern about whether particular acts or transactions are allowed by Viatris policy or applicable laws with the Compliance or Legal Department before proceeding. Viatris personnel must report every actual or suspected violation of company policy, the FCPA, the UKBA, or any other applicable anti-corruption or anti-bribery law that they reasonably believe has occurred or may occur in the future, in accordance with the Viatris Global Policy on Reporting and Investigating Matters.