
Global Sustainability Oversight and Compliance

Viatrix' Board of Directors oversees management's efforts with respect to corporate environmental and social responsibility matters through its Governance and Sustainability Committee. The Global Sustainability function operates as a center of excellence within the Corporate Affairs leadership team. The Chief Corporate Affairs Officer reports directly to the CEO and communicates quarterly with the Viatrix Board through the Governance and Sustainability Committee together with the Head of Global Sustainability. On an annual basis the Governance and Sustainability Committee reviews progress with the Chief Corporate Affairs Officer on corporate environmental and social responsibility-related matters that have been discussed with the Viatrix Board to confirm the company is tracking its priorities in this area. The Head of Global Sustainability drives the strategic and operational development of sustainability across the company together with key partners.

The global sustainability function includes members in the U.S., Europe and India, with key partners across other functions and geographies. A multifunctional 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. Progress on strategic focus areas and execution

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 of purchase.

The Viatris leadership team is updated on a quarterly basis and as needed regarding the status of the overall cybersecurity program, emerging external and internal risks and key risk indicators performance. The Compliance and Risk Oversight Committee receives reports from senior management on data security, cybersecurity, and information security related matters on at least a quarterly basis, including with respect to related risks, risk management, and relevant legislative, regulatory and technical developments. The Chief Information Security Officer and Chief Information Officer report quarterly to the Compliance and Risk Oversight Committee of the Viatris Board regarding our information security program and performance and provide the board with performance and risk indicators as well as comparators to our peer group.

We use a managed security provider (MSP) through a 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 at all times, 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. When first joining Viatris and then annually, employees and contract workers receive training on information security and acceptable use of company computing and information resources. Our standards and policies are reviewed on an annual basis by a third party.

As part of this program, we execute a Cybersecurity Incident Response Plan (referred to as CIRP) to establish a guide for leadership and incident response stakeholders through an "incident," that is a single event, or a set of anomalous and adverse "events" (for purposes of the CIRP, a change in a system or technology device that could impact the confidentiality, integrity, and availability of Viatris' data and technology assets) caused by malicious intent or by accident impacting Viatris' network, computing systems or digital information). The CIRP is managed by the information security team and is reviewed at least annually. We test the CIRP through technical exercises at least semi-annually, review the CIRP with executive management annually, and periodically conduct executive tabletop exercises and scenarios. The CIRP provides an overview of critical actions to take throughout the incident response lifecycle and contains a severity matrix used to guide the incident response stakeholders on communication and escalation protocols.

As part of continuing to improve our overall information security capabilities, we focus on addressing all areas of the National Institute

We conduct periodic enterprise risk assessments to identify key and emerging risks. For each key and emerging risk identified, we have a process to establish risk monitoring ownership.

In addition to several of its oversight responsibilities, the Compliance and Risk Oversight 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.

Information Security

We have an information security 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 Information Security organization consists of an internal team of certified subject matter experts in information security, risk management, supply chain information security, incident response, access and application security, education and awareness and security operations. The team is supplemented by 24/7/365 managed security service providers who serve as the initial point of contact globally for security monitoring, incident response and vulnerability management.

Identify, Detect, Protect, Respond and Recovery. Most recently, we have launched an enterprise-wide behavioral education tool that provides feedback to colleagues on their individual risky behaviors and provides real-time education and awareness opportunities to take preventative actions.

Every two years, we conduct a cybersecurity maturity benchmark against the NIST CSF using the Gartner Cybersecurity Controls Assessment tool. In addition to the overall risk mitigation program, we carry a multitiered cyber insurance policy.

Global Privacy Governance

In response to the growing landscape of global data privacy laws, Viatris is committed to protecting information relating to identified or identifiable natural persons (personal data) collected and processed during the course of business activities. Additionally, Viatris recognizes a 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 regulatory requirements regarding the management of personal data.

Viatris demonstrates this commitment to data privacy laws and its obligation to individuals with the implementation of a global privacy program. The Viatris Global Privacy program reports regularly to the company's Compliance and Risk Oversight Committee and is responsible for the development, implementation, maintenance and adherence to the company's policies and procedures and applicable data privacy laws and principles. All company personnel are required to adhere to and comply with these data privacy policies and procedures and with applicable data privacy laws and principles. 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 Viatris Privacy Notice (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, or 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 Viatris.

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;

- 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 an individual's privacy rights requests;
- Risk assessment and management, monitoring, and audit;
- 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 Viatris 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.

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

[Viatris' website](#) features the following compliance documents available for the public:

- Standards for Interactions with Healthcare Professionals ("Standards") Policy Summary
- Global Anti-Bribery and Anti-Corruption Business Standards for Vendors and Agents
- Global Fair Competition and Antitrust Business Standards for Vendors and Agents
- Global Anti-Corruption Policy Summary
- Global Antitrust and Fair Competition Policy Summary
- Code of Business Conduct and Ethics (which includes Viatris' prohibition of bribery and corruption in all forms, including money laundering, facilitation payments, and fraud)

and focused in-market reviews leveraging data monitoring. In 2023, Viatris further evolved data analytic capabilities to monitor third-party distributors as well as field and headquarter based activities.

We take all allegations of conduct that is 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 Compliance Committee of the Viatris Board on a regular cadence.

Nurturing the Culture of Compliance

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

We have further enhanced and 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.

Looking into 2024, we will continue to further embed ethics and integrity into the business and mindset via quarterly leadership Compliance-related messaging.

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 functions.

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 the government receive additional, focused training related to Standards for Interactions with HCPs from their local Compliance partner(s). 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.

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 and Ethics, Fair Competition and Anti-Corruption, among other topics, and track completion rates. All Viatris colleagues are mandated to take the Code of Business Conduct and Ethics training. Because of employee departures and divestitures, in the calendar year of 2023, the rolling completion rate was 93%.

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. In 2023, we launched translated versions of our interactive Compliance computer-based training modules in 11 key company languages via the company's learning management system covering the following topics: Anti-Corruption, Fair Competition, and the Code of Business Conduct and Ethics.

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

Reporting Compliance Concerns

We encourage open communication and provide a variety of channels for reporting potential compliance violations. 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. This is a grievance mechanism where employees are safe to report any suspicions of practices that are contrary to Viatris' policies or applicable law, anonymously (where permitted by law). The Compliance Line is available 24/7 and permits anonymous reports in countries in local languages, where permitted by law. Viatris strictly prohibits retaliation

As part of the company's ERM program, 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 including investigation and clarification of discovered legal, civil and reputational allegations or convictions. Based upon risk, we conduct targeted monitoring of third-party distributors in Viatris' Emerging Markets region.

Viatris has a third-party due diligence program that is global in scope, managed by a dedicated team. Per its scope, 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 (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
- Restricted party screening under the global trade control procedure

In 2023, new due diligence process policies were established to further clarify requirements and educate employees on their responsibilities. Looking forward, we will continue to enhance and expand 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

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 serve 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.
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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.

The 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

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

