



## Global Fair Competition and Antitrust Business Standards for Vendors and Agents

Viatriis is committed to making an impact via integrity and acting ethically in accordance with all applicable laws and regulations. To achieve our mission of empowering people to live healthier at every stage of life, we must inspire a solid sense of trust. Our stakeholders – especially the patients we are pledged to serve – need to know that we will strive to do the right thing on every step of our journey as we work to expand access to medicines. They need to have confidence that we will never take shortcuts along the way or compromise our high standards of safety, quality, and ethics.

We expect this same commitment from any third party consultants, representatives, or other individuals engaged by Viatriis to perform work on Viatriis' behalf ("Agents") or suppliers of goods or services to Viatriis ("Vendors"). The Global Fair Competition and Antitrust Business Standards for Vendors and Agents ("Business Standards") set out the core principles and requirements concerning fair competition and antitrust which Agents and Vendors must abide by at all times during the course of providing services to Viatriis. Nothing contained in these Business Standards shall be deemed to create an employment relationship between Viatriis and any Vendor or Agent. Compliance with these Business Standards is mandatory for Agents and Vendors engaged by Viatriis.

### **FAIR COMPETITION AND ANTITRUST GOVERNANCE**

- Antitrust and fair competition laws and regulations around the world are intended to promote fair and honest competition in the marketplace. Although antitrust and fair competition laws vary from place to place, generally, these laws prohibit:
  - Agreements or concerted practices between companies to improperly monopolize or divide markets, control prices, limit production, or otherwise unreasonably restrain competition or engage in unfair business practices;
  - Unilateral conduct that constitutes monopolization, attempted monopolization, or any other abuse of a dominant position in any market; and,
  - Discriminatory pricing.
- Due to the complex nature of antitrust and fair competition laws and regulations, as well as the potential civil and criminal consequences of violating them, Agents or Vendors are required to consult with the Viatriis Legal Department if they encounter a situation that may involve a potential or suspected non-compliance with any of these laws or regulations.
- Agents and Vendors that are contacted by a government enforcement official concerning a potential violation of any applicable antitrust or fair competition law relating to business of Viatriis, must promptly notify the Viatriis Legal Department.



## PROHIBITED BEHAVIOR

- Agents and Vendors are strictly prohibited from engaging in any behavior, either independently or through discussions or agreements with others, that is aimed at, or could be construed as, violating the applicable antitrust or fair competition laws.
- Agents and Vendors must not improperly disparage products of competitors (i.e., any business or individual that is developing, producing, marketing, or selling a product or service that competes or potentially competes with a product or service under development, produced, marketed, or sold by Viatriis) to customers (i.e., any entity that has purchased or received, or that may potentially purchase or receive, a product or service offered by Viatriis) or other third parties. Discussions with customers should focus on the quality and value of company products and services.

## PROPRIETARY OR COMPETITIVELY SENSITIVE INFORMATION

- Agents and Vendors must not attempt to improperly obtain or use proprietary or competitively sensitive information<sup>1</sup> from any unauthorized source. This includes, but is not limited to, proprietary or competitively sensitive information received from a competitor or other third party.

## INTERACTIONS WITH COMPETITORS

- Agents and Vendors are strictly prohibited from discussing or sharing proprietary or competitively sensitive information with a competitor.
- If a discussion with a competitor turns to discussion of proprietary or competitively sensitive information or other competitively sensitive information such as prices, bids, etc., Agents and Vendors must:
  - Inform the competitor that they will not discuss such information;
  - Immediately end the conversation; and
  - Promptly report it to the Viatriis Compliance Line as noted below.
  - Agents and Vendors who have concerns about whether particular acts or transactions are permitted by applicable antitrust or fair competition laws must ask the Viatriis Legal Department for guidance before proceeding.

## ANTITRUST AND FAIR COMPETITION TRAINING

- Agents and Vendors must complete training on antitrust and fair competition as required

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<sup>1</sup> Information concerning a company's business operations that is neither public knowledge nor readily ascertainable by the public through proper means, and that derives independent value (actual or potential) from being unknown to the public. Examples include but are not limited to all forms of financial, strategic, business, scientific, technical, or economic information, including strategic plans, programs, formulas, devices, designs, prototypes, methods, techniques, processes, procedures, and codes, whether tangible or intangible, and irrespective of how it is stored, compiled, or memorialized.



upon commencing services on behalf of Viatris or acting on behalf of Viatris.

#### REPORTING SUSPECTED OR ACTUAL VIOLATIONS

- Agents and Vendors that become aware of any potential violations of applicable laws or these Business Standards must immediately cease participating in the prohibited or questionable behavior, activity, or relationship and report the potential violation.
- Agents and Vendors may choose to report anonymously if they do not wish to identify themselves. Every effort will be made to keep reports confidential to the extent possible, consistent with the need to conduct an adequate investigation and in accordance with any applicable local law. Retaliation against any Agent or Vendor who report potential violations of these Business Standards in good faith is strictly prohibited.
- Agents and Vendors are expected to report such potential violations of these Business Standards to the Viatris Compliance Line as follows:

**Call:** [Compliance Line phone numbers accessible by country](#)

**Email:** [compliance@viatris.com](mailto:compliance@viatris.com)

**Online:** [www.viatris.integrityline.com](http://www.viatris.integrityline.com)

**Mail:** The Network

(Attn. Viatris)

333 Research Court

Norcross, GA 30092 U.S.