



2022

Transparency Act Report

Viatrix AS

This report has been prepared in accordance with the Norwegian Transparency Act (the “Transparency Act”) section 5 and summarizes the policies and procedures in Viatris AS with respect to safeguarding of human rights and decent working conditions in the financial year 2022. This report is divided into the following parts: (i) a description of how Viatris AS is organized, the types of products and services that Viatris AS offers and the markets in which it operates; (ii) a description of the policies, procedures, and due diligence that Viatris AS utilizes to safeguard human rights and decent working conditions; (iii) the mechanisms that Viatris AS utilizes to allow for persons to identify potential issues concerning human rights and decent working conditions; and (iv) the results of Viatris AS’ efforts to safeguard human rights and decent working conditions.

A. About Viatris AS

Viatris AS is a pharmaceutical company residing in Asker, Norway and is an indirect wholly-owned subsidiary of Viatris Inc., which is a large, global healthcare company that is headquartered in the U.S. with global

centers in Pittsburgh, Pennsylvania, Shanghai, China and Hyderabad, India. Viatris AS commercializes and sells branded, generic, and over the counter pharmaceutical products in only the Norwegian market that cover a wide variety of therapeutic areas. In 2022, Viatris AS had 37 employees and total turnover of NOK 659 million. Viatris AS was the third largest pharmaceutical company in the country both in volume and value for in-market-sales in 2022. Viatris AS’ employees are comprised of those who primarily work in commercial, sales, and support functions. Viatris AS has no in-house manufacturing capabilities or manufacturing plants located in Norway.

B. Policies, Procedures, and Due Diligence Concerning Human Rights and Decent Working Conditions

Viatris AS is subject to several global policies, procedures, and the due diligence practices of Viatris Inc. that demonstrate its strong commitment to safeguarding human rights and decent working conditions. We first provide an overview of its policies, procedures, and due diligence efforts to safeguard

human rights and decent working conditions for its own employees and then provide an overview of its policies, procedures, and due diligence efforts to safeguard human rights and decent working conditions for third parties who provide products or services to Viatris AS.

a. Human Rights Protections and Decent Working Conditions for Viatris AS Employees

Viatris Inc.’s Code of Business Conduct and Ethics, to which all of its employees (including those at Viatris AS) are subject, outlines guiding principles on how employees and those working on our behalf must conduct themselves. In particular, page 28 of Viatris Inc.’s Code of Business Conduct and Ethics (link here: [Code of Business Conduct and Ethics \(viatris.com\)](https://www.viatris.com/code-of-business-conduct-and-ethics)) provides a description of Viatris Inc.’s employment practices, including its commitment to “create a work environment that is productive, healthy, safe and free from unlawful discrimination, harassment and retaliation.” Moreover, Viatris Inc. has several additional global policies and procedures demonstrating its commitment to human rights and decent

working conditions, including its Global Policy Statement Regarding Slavery and Human Trafficking, Global Policy on Combatting Human Trafficking in Persons, and Policy on Diversity and Inclusion and the Global Policy Prohibiting Discrimination, Harassment and Retaliation. For more information on these policies, we refer you to Page 84 of Viatris Inc.'s Global Corporate Social Responsibility Report for financial year 2022 that was published on May 17, 2023 (link here: [2022-sustainability-report.pdf \(viatris.com\)](#)) ("Sustainability Report").

Viatris Inc. also has global policies and practices demonstrating its commitment to providing decent working conditions for all of its employees, including those at Viatris AS. In particular, and as described in greater detail at Page 34 of the Sustainability Report, protecting the health and safety of its colleagues is essential at Viatris Inc. For example, Viatris Inc. has a global Environmental, Health and Safety (EHS) Management System, technical requirements, processes and systems to establish its foundation. Moreover, and as described in greater detail at Pages 35-37 of the Sustainability Report, Viatris Inc. has

globally implemented processes geared towards various areas, including office and driver safety.

b. Human Rights Protections and Decent Working Conditions for Third Parties Supplying Services to Viatris AS

In addition to some of the policies and practices identified above, Viatris Inc. has global policies and procedures that are specifically geared towards trying to ensure that third-parties that work with all of its affiliates – including Viatris AS – are respecting human rights and decent working conditions. In particular, and as described in greater detail of Page 66 of the Sustainability Report, Viatris Inc. launched in 2022 its Global Supplier Code of Conduct (link here: [viatris-supplier-code-of-conduct.pdf](#)) – which is the guiding document for suppliers wanting to do business with any of Viatris Inc.'s affiliates, including Viatris AS, and sets a minimum standard of conduct. Page 3 of the Global Supplier Code of Conduct lays out the expectations in several specific areas concerning labor and human rights, including freely chosen employment, fair treatment, and non-discrimination.

Viatris Inc. has additional global practices geared towards attempting to ensure that its third parties are behaving consistently with its expectations. For example, and as described in greater detail at Page 66 of the Sustainability Report under the section "Partnerships for More Sustainable Outcomes," Viatris Inc. is a full active and elected board member of the Pharmaceutical Supply Chain Initiative (PSCI), which is a group of pharmaceutical and healthcare companies who share a vision of better social, health, safety and environmental outcomes in the communities where these companies engage. Viatris Inc., and by extension Viatris AS, is benefitting from joint principles on and helping to promote collectively responsible supply chain management and better conditions across the industry, including through assessing third parties that may provide services to Viatris AS.

Moreover, and as described in greater detail at Page 66 of the Sustainability Report under the section "Mitigating Supply Chain Risks," and Pages 82-83 of that report under the section "Ensuring Good Conduct in External Partnerships," Viatris Inc. has global practices designed to ensure its third parties – including

those who work with Viatris AS – are safeguarding human rights and decent working conditions. For example, Viatris Inc. has a third-party due diligence program that is global in scope and is managed by a dedicated team. Per its scope, due diligence reviews must be performed whenever any Viatris Inc. affiliate, including Viatris AS, enters into certain agreements with third parties which fulfill specific criteria for review. 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.

c. Additional Efforts Undertaken by Viatris Inc. to Safeguard Human Rights and Decent Working Conditions

In addition to the policies, procedures, and due diligence efforts identified above, Viatris Inc. – and, in turn, Viatris AS – demonstrates its commitment to safeguarding human rights and decent working conditions through, among others: (i) advancing sustainable sourcing, (ii) making constant improvements to its environmental health and safety program, and (iii)

engaging in responsible political activity. For greater detail of Viatris Inc.'s efforts in these regards, we refer to the following sections of the Sustainability Report:

- The Advancing Sustainable Sourcing Section at Page 65. In particular, Viatris Inc. applies sustainability criteria in supplier engagement and – in so doing – seeks to further reduce risk, build resilience and contribute to more sustainable outcomes for partners across our value chain;
- The Environmental, Health, and Safety Section at Page 71. For example, Viatris Inc.'s Global EHS Management System builds on a four-step cycle for continuous improvement - namely planning, implementation, measuring implementation performance, and performance improvement; and
- The Engaging in Political Activity Responsibly Section at Page 84. Among other areas of interest, Viatris Inc. supports efforts that contribute to pharmaceutical safety and innovation to further

our mission in providing patients access to high-quality medicines.

C. Mechanisms Utilized by Viatris AS to Allow for Complaints Concerning Human Rights and Decent Working Conditions Concerns

As described in greater detail at Page 83 of the Sustainability Report, Viatris Inc. has global policies and practices allowing for all of its employees, including those at Viatris AS, or third parties who work with Viatris AS, to raise compliance concerns including those concerning human rights and decent working conditions. In particular, Viatris Inc. encourages open communication and provide a variety of channels for reporting potential compliance violations. All employees, including those at Viatris AS, are encouraged to discuss compliance concerns with their supervisor, Human Relations, Legal or Compliance. Viatris AS employees also can use the company's Compliance Line, which is operated by an external party. This is a grievance mechanism where employees should feel safe to report. The Compliance Line is available 24/7 and permits anonymous reports in

countries in local languages, where permitted by law. The Compliance Line is available both on Viatris Inc.'s intranet and external website.

Moreover, and again as described at Page 83 of the Sustainability Report, Viatris Inc. has policies and practices to allow for investigating, resolving, and remediating reported events. Specifically, Viatris Inc. has a global policy on Reporting and Investigating Compliance Related Matters that 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. Moreover, Viatris Inc.'s policy requirements on reporting and investigating matters were assessed for updates in 2022 to incorporate specific EU Whistleblower Directive provisions.

D. Results of Viatris AS' Efforts to Safeguard Human Rights and Decent Working Conditions

Viatris Inc., and by extension Viatris AS, is committed to operating ethically and with integrity and seek to apply a holistic, enterprise-wide approach to risk

management. Viatris Inc. is subject to a number of risks inherent in the complex and rapidly changing environment in which it operates 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 the 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. For more information on Viatris Inc.'s Risk Governance and Management practices, we refer you to Pages 78 and 79 of the Sustainability Report.

As described throughout this report, the Company's risk management includes policies, procedures, and due diligence efforts to deal with the significant risk of issues concerning human rights and/or decent working conditions. Our risk assessment analysis encompasses, but is not limited to, the following risks and potential adverse impacts: wages,

working hours, and safety in the workplace. For a description of the human rights related topics that are covered by the Company's various policies, procedures, and programs, we refer you to Page 84 of the Sustainability Report.

In 2022, Viatris AS did not identify any issues or concerns for any of its employees regarding human rights and/or decent working conditions. Moreover, based on our risk analysis, we are not aware of actual adverse impacts on fundamental human rights and decent working conditions linked to our operations.

With respect to a supplier for one of our products, a PSCI due diligence assessment identified that this supplier's facility did not perform a risk assessment to determine if there are areas of their business at risk against forced or involuntary labor. Follow up measures with this supplier have been taken in order to address this. This specific supplier agreed to initiate a risk assessment in this regard- which is ongoing and monitored by Viatris.

E. Moving forward in 2023

In 2023, Viatris is committed strengthening its efforts on safeguarding human rights and decent working conditions by, for example, continuing to collaborate with our partners within PSCI, engaging with our suppliers, and continuously improving our efforts to safeguard human rights and decent working conditions.

We note that all forward looking statements in this report – including those that refer to the Sustainability Report – reflect current expectations of future events and are subject to factors which results may differ from those described in the forward-looking statements. These statements are subject to the disclaimer covering forward-looking statements as described at Page 98 of the Sustainability Report.