

UK Tax Strategy – Viatris’ Approach to Tax

Introduction

Viатris Inc., along with its subsidiaries (collectively “Viатris” or “the Company”), is a global healthcare company headquartered in the United States. The Company was formed in November 2020 and has a mission to empower people worldwide to live healthier at every stage of life, regardless of geography or circumstance. Viатris’ seasoned management team is focused on ensuring that the Company is optimally structured and efficiently resourced to deliver sustainable value to patients, shareholders, customers, and other stakeholders. With a global workforce of 37,000, the Company has industry leading commercial, R&D, regulatory, manufacturing, legal and medical expertise complemented by a strong commitment to quality and unparalleled geographic footprint to deliver high-quality medicines to patients in more than 165 countries and territories.

Our tax approach seeks to support this vision and also to balance the interests of our various stakeholders including patients, suppliers, shareholders, governments and employees. Viатris pays a range of taxes including corporate income taxes, stamp duties, withholding taxes, employment and other taxes. We also collect and pay employee taxes as well as indirect taxes such as VAT and excise duties. We seek to ensure that our tax approach is aligned with our mission, our core values and our overall strategy. We are committed to being a responsible taxpayer, being straightforward and transparent on all tax matters and acting fairly, responsibly and with integrity in all our dealings with tax authorities.

We are committed to ensuring we pay the tax we are legally required to pay in each of the territories in which we operate. Viатris is committed to complying with all tax rules and regulations in those territories and we safeguard our reputation as a responsible taxpayer. However, we recognise we also have a responsibility to protect our stakeholders by not paying more taxes than legally required.

Financial Year

This published UK tax strategy relates to the 2023 financial year.

Tax Governance Framework

The Head of Global Tax is directly responsible for Viатris’ tax strategy which is overseen and approved by the Chief Financial Officer. Under direction of the Head of Global Tax, the strategy is implemented by the global tax team, with support from global, regional and local finance teams.

Viатris’ tax status is regularly reported to the Audit Committee of the Board of Directors and the Audit Committee is responsible for monitoring any significant tax matters. Audit Committee meetings are attended by the Chief Financial Officer and Head of Global Tax.

Tax Risk Management

Viатris is subject to taxation throughout our supply chain. The worldwide nature of our operations means that our intellectual property, R&D and manufacturing operations are centred in a number of key locations. A consequence of this is that our cross-border supply routes, necessary to ensure supplies into numerous end markets, can be complex, leading to tax complexity and risk.

As a business, we are subject to taxation in the many countries in which we operate. The tax legislation in these countries differs and is often complex and subject to interpretation by management and the government authorities. Recent developments in the international tax arena have increased the likelihood of changes to tax systems in the countries in which we operate, and this creates added uncertainty. We are committed to complying with tax law and practice in the UK and all the territories in which we operate.

Investment, growth and acquisition opportunities result in changes in the Company structure. The Company operates a comprehensive business approvals process whereby all material transactions and proposed changes to business operations require prior approval from senior management including the Head of Global Tax.

Tax risk is managed through robust internal policies, processes, training and compliance programmes to ensure we have alignment across our business and meet our tax obligations.

As part of our quarterly financial reporting process, the global tax team requires Viatris and its subsidiaries to report and/or provide updates as to any items of tax risk or tax controversy. Material risks are notified to the Audit Committee.

Tax Planning

We only engage in tax planning that directly supports our business activities. Thus, any tax planning undertaken will have commercial and economic substance and will have regard to Viatris' wider vision and strategy. We will seek to minimize uncertainty, risk or disputes and we will engage external advisors as appropriate to achieve this. As such our tolerance for risk is low in this regard.

We conduct transactions between Viatris subsidiaries on an arm's-length basis and in accordance with current OECD principles.

We do aim to make use of those tax incentives and exemptions intentionally provided in law, for example capital allowances and credits associated with research and development expenditure.

Relationship with Tax Authorities

We engage with HM Revenue and Customs ("HMRC"), with honesty, integrity and transparency in respect of all tax matters. We will work collaboratively with HMRC wherever possible to resolve disputes or where there is uncertainty in the interpretation of tax laws.

We believe that by following the principles set out above the tax function will continue to support the Viatris mission to empower people worldwide to live healthier at every stage of life, regardless of geography or circumstance.

Viатris considers that the publication of this statement complies with the duty set out in Paragraph 16(2) Schedule 19 Finance Act 2016.