

Document Name: California Comprehensive Compliance Program

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Document Owner: Compliance and Ethics

At McKesson, we believe that integrity is the foundation of our culture and is critical to our long-term success. We work to inspire and enable McKesson employees, officers, and directors to act with integrity in all we do, and we are committed to complying with the laws, regulations, and internal and external policies that apply to our business operations.

As part of our continued commitment to compliance, McKesson has a comprehensive Compliance Program that is based on the U.S. Department of Health and Human Services Office of Inspector General's Compliance Program Guidance for Pharmaceutical Manufacturers ("OIG Guidance"), to the extent applicable to our businesses. McKesson regularly reviews and updates the Compliance Program to incorporate legal, regulatory, and operational changes.

Our Compliance Program consists of the following elements:

I. Compliance Leadership and Oversight

Our Chief Compliance Officer is aided by a Compliance and Ethics Organization which includes designated compliance officers for each of our businesses and multiple subject matter experts. The Chief Compliance Officer oversees and monitors implementation of our programs and meets regularly with our Executive Operating Team, which includes the Chief Executive Officer, and the Compliance Committee of the Board to discuss the compliance program.

Our compliance program includes:

- Written standards of conduct, including our Code of Conduct and policies and procedures
- Risk assessments
- Training and communication
- Monitoring and testing
- Confidential reporting channels and internal investigations
- Continuous improvement, including corrective action and/or preventive action, where necessary

Our Board has a standing Compliance Committee, whose purpose is to assist the Board in overseeing McKesson's compliance programs and management's identification and evaluation of the Company's principal legal and regulatory compliance risks. The Compliance Committee meets regularly throughout the year, including in separate executive sessions with the Chief Compliance Officer and the Chief Legal Officer. The Compliance Committee also meets jointly with the Audit Committee to review management's assessments of its regulatory and compliance programs.

II. Written standards of conduct, including our Code of Conduct and policies and procedures

Our company operates in multiple business and regulatory environments. To help ensure that all employees, officers, and directors—regardless of position or tenure—uphold high legal and ethical standards, we embed our expectations in our [Code of Conduct](#).

A foundational document across our company, our Code of Conduct is based on our [I²CARE](#)

shared values. It describes the fundamental principles and policies that shape our work, covering a wide range of topics that may occur when interacting with customers, industry partners, regulators, healthcare professionals, each other, and others. It gives helpful guidance regarding where to turn with questions or concerns about the right thing to do.

In addition to our Code of Conduct, McKesson has established compliance policies and procedures that are designed to prevent and detect potential violations of applicable laws, regulations, and ethical standards.

McKesson has also established an annual spending limit of \$2,000 for certain promotional activities that may be provided to a medical or healthcare professional licensed or certified in the state of California.

III. Risk assessments

We regularly assess compliance and regulatory risks across our operations. In addition to the corporate compliance and ethics programs that address general enterprise-wide topics, other programs are designed to mitigate more specific risks. Our approach includes conducting regular risk assessments and developing comprehensive work plans to mitigate compliance risks, with many actions owned by the business. Compliance leaders also participate in the company's annual enterprise risk assessment which focuses on risks that could impact the organization in achieving its strategic and operational objectives.

IV. Training and communication

McKesson has implemented a focused compliance training and communications plan to educate employees, officers, directors, and business partners on business risks and company policies relevant to their roles. Our approach combines various training methods reinforced through, among other things, supporting communication resources available via our corporate intranet and through leadership messaging and communications. These training and communication resources are assessed periodically and updated to align with changes in laws, regulations, and/or company policies.

V. Monitoring and testing

We have implemented a range of compliance monitoring and testing activities, including data analytics, to monitor the adequacy and effectiveness of our compliance programs to mitigate risks. These programs enable us to identify trends and potential red flags, provide insights about our program's robustness, and identify opportunities for continuous improvement. Identified issues and opportunities are addressed through action plans.

VI. Enforcing standards through well-publicized disciplinary guidelines

Our Code of Conduct provides notice to impacted individuals that noncompliance with the Code will have disciplinary consequences, up to and including termination of employment.

VII. Confidential reporting channels and internal investigations

McKesson offers multiple channels for employees and third parties to raise concerns. Employees may contact any people leader, compliance officer, human resources, or the legal department with concerns. Employees may also report concerns by email. In addition, McKesson provides confidential integrity hotlines available 24 hours a day, seven days a week, 365 days a year with multiple language capabilities.

McKesson's integrity hotlines allow employees and third parties to raise concerns (anonymously if they wish) about potential violations of law, regulation, McKesson's Code of Conduct, company policies, or any other actual or potential misconduct. The integrity hotlines are publicized in multiple ways, including

in our Code of Conduct, in training materials, on our internal websites, and through awareness campaigns.

Our company policies are designed to protect employees from retaliation for raising concerns, asking questions, seeking guidance, or participating in an investigation. McKesson takes all concerns seriously and investigates allegations of misconduct. We also provide reports of significant matters to the Compliance Committee and the Audit Committee of the Board.

VIII. Corrective and preventive action

We assess investigative findings and develop corrective action plans as appropriate. Impacted business leaders are accountable for implementing corrective action plans within their area of responsibility. Issues or opportunities to remedy and prevent future violations of law, regulations, and company policies that are identified as part of monitoring processes are addressed through action plans.

McKesson's Annual Declaration of Compliance for Purposes of California Health & Safety Code §§ 119400 - 119402

As of April 11, 2023, based on our good faith understanding of the requirements of §§ 119400-402 and to our knowledge, we are in material compliance with California Health & Safety Code §§ 119400-402, to the extent applicable to our businesses. Our Compliance Program is subject to ongoing review and accordingly, may be updated from time to time.

A copy of this declaration and the above description of McKesson's Compliance Program may be obtained by calling the Compliance hotline toll-free at (877) 625-4625.