

**MCKESSON**



**Code of Conduct**

## Messages from Leadership



At McKesson, the way we do business is just as important as the business itself.

Our employees understand the responsibility we bear as we work together toward our common mission to improve care in every setting. We partner with biopharma companies, care providers, pharmacies, manufacturers, governments and community organizations to deliver insights, products and services that make quality care more accessible and affordable.

As an impact-driven company that touches virtually every aspect of healthcare, we must always remember that customers, patients, partners,

shareholders and colleagues count on us to do the right thing. Together with our I<sup>2</sup>CARE and ILEAD values, the McKesson Code of Conduct serves as our guide to behaving with honesty and integrity, always in accordance with legal and regulatory requirements. Please take the time to read, understand and commit to our Code.

Thank you for your dedication to our mission and for upholding our reputation as a trusted partner.

**Brian Tyler**  
*Chief Executive Officer*



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for upholding our  
reputation as a  
trusted partner.**

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*Chief Executive Officer*

# Messages from Leadership



guide. It steers our commitments to our customers, partners and colleagues, and it ensures we hold ourselves accountable for keeping our promises.

Above all, we are committed to the greater good. At the start of every day, we know it's not just a package, it's a patient.

**Kelvin Baggett**  
*Chief Impact Officer*

What sets McKesson apart as an exceptional place to work is our people and our culture. McKesson employees make decisions, both big and small, with a focus on what is ethically right.

We aim to positively influence the social, environmental and economic conditions for our team members and the communities where we live and work. Central to this goal is a culture where trust, integrity and accountability are at the heart of everything we do.

As the healthcare industry continues to undergo significant changes, the McKesson Code of Conduct serves as our constant



Being part of Team McKesson means that nothing is more essential to our success than putting our I<sup>2</sup>CARE values into action – every day, and in everything we do.

Our ILEAD behaviors encourage each of us to be open and candid to ensure that we have the right information to make the best decisions for McKesson and create an environment where others feel supported to do the same. Not only are questions and concerns welcome, but Speaking Up when we have a concern is essential to our culture and how we do business.

McKesson's confidential Hotlines are resources for

anyone to use to Speak Up about a concern without fear of retaliation. You can also reach out with a concern through other Speak Up Channels – any People Leader, Human Resources leader, a Law Department leader or Compliance Department leader – also always without the fear of retaliation. Whatever Speak Up Channel you chose, you have an obligation to promptly raise a concern if you have reason to believe a violation of the Code, our policies and procedures and/or the law has occurred. If in doubt, Speak Up!

Thank you for your personal commitment to living I<sup>2</sup>CARE in Action every day with the Code as your framework.

**Laura O'Donnell**  
*Chief Compliance Officer*





## Our Purpose

Advancing health outcomes for all™



## Our Mission

To improve care in every setting — one product, one partner, one patient at a time



## Our Values

Our I<sup>2</sup>CARE values guide how we interact with and meet our commitments to regulators, customers, business partners, patients, communities, shareholders and each other.



# I<sup>2</sup>CARE in Action

Our Code embodies I<sup>2</sup>CARE in Action and is a resource to help you make the right decisions. You are responsible for following the Code and always doing what's right.

## We are I<sup>2</sup>CARE in Action



- We act with integrity.
- We Speak Up without fear of retaliation.
- We are accountable.
- We prioritize regulatory excellence.
- We show respect.
- We are inclusive.
- We are proactive.
- We engage in sustainable business practices.
- We detect and respond to compliance issues.

## Our Code

Our Code, policies and procedures are tools to help you perform your job with integrity, drive regulatory excellence and make ethical decisions in accordance with our I<sup>2</sup>CARE values.

Our Code must be followed by anyone who conducts business for McKesson, including:

- McKesson employees, officers and directors, regardless of position or tenure
- Subsidiaries, controlled affiliates and majority-owned joint ventures

We also seek business partners who share our values and commitment to doing business with integrity.

## Core Principles

- Follow the laws and regulations that apply to McKesson
- Live I<sup>2</sup>CARE in Action in all your McKesson activities
- Speak Up promptly about any concerns you have about complying with our Code, McKesson policies or the law
- Drive regulatory excellence every day



# Table of Contents

<b>Our Responsibilities</b>	<b>7</b>	<b>Our Relationships with Governments</b>	<b>34</b>
Your Responsibilities	8	Regulatory Excellence	35
Responsibilities of Leaders	8	Working with Governments	37
Making Ethical Decisions	9	Political Contributions and Political Activities	38
Ethical Decision-Making Guide	9		
Consequences of Noncompliance	11	<b>Our Company</b>	<b>39</b>
Disciplinary Action	11	Avoiding Conflicts of Interest	40
Seeking Help and Speaking Up	12	Preventing Insider Trading Violations	42
Our Commitment to Non-Retaliation	13	Protecting Our Assets	44
How to Contact McKesson Hotlines	13	Safeguarding Private and Personal Information	48
How We Handle Concerns	14	Maintaining Accurate Records and Financial Reports	50
Waivers and Exceptions	16	Safeguarding Our Reputation	51
<b>Our People</b>	<b>17</b>	<b>Our Communities</b>	<b>52</b>
Embracing a Respectful Workplace	18	Protecting Our Environment	53
Keeping Workplaces Safe, Healthy and Secure	21	Respecting Human Rights	54
		Responsible Sourcing	55
		Investing in Our Communities	56
<b>Our Customers</b>	<b>25</b>		
Marketing and Selling Ethically	26	<b>Conclusion</b>	<b>57</b>
Conducting International Trade Compliantly	31	Compliance and Ethics at McKesson	58
Competing Honestly and Fairly	32	McKesson Hotlines	58
Anti-Money Laundering and Terrorist Financing	33		





# Our Responsibilities

## Your Responsibilities

We all have a responsibility to put I<sup>2</sup>CARE in Action, always do the right thing and never compromise on integrity and ethics.

It is your responsibility to:

- Be familiar with the regulatory requirements relevant to your job
- Know and follow the policies that apply to your role
- Seek help if you have a question or are uncertain about the correct decision before making it
- Speak Up if you have concerns about potential violations of the Code, McKesson policies or the law
- Cooperate fully with investigations
- Communicate truthfully and professionally



## Responsibilities of Leaders

People Leaders have an ongoing responsibility to promote I<sup>2</sup>CARE in Action.

Some examples of key responsibilities for People Leaders include:



**Lead by example** and follow the Code and McKesson policies



**Commit yourself and your team to understand the regulations** that impact your roles



**Ensure that your team completes all assigned compliance training**



**Nurture a culture** where your team feels comfortable Speaking Up



**Proactively take steps** to promptly detect, correct and respond to compliance issues



**Prevent retaliation** against those who Speak Up and/or cooperate in an investigation



**Encourage and recognize acts of** integrity and ethical decision-making

# Making Ethical Decisions

We operate around the world, and we follow the laws in every country where we do business. If a law is more restrictive than our Code, we follow the stricter requirement. In all situations, we follow the highest ethical standards and support each other in conducting business with integrity and always doing the right thing.

Our Code provides guidance and resources to help you live I<sup>2</sup>CARE in Action, but it can't predict every situation you may face. When in doubt, refer to our I<sup>2</sup>CARE values and our Code, follow the steps in the Ethical Decision-Making Guide, and seek help from any of the following Speak Up Channels:

- Any People Leader
- The Compliance Department
- The Human Resources Department or the U.S. Human Resource Support Center
- The Law Department
- The [Integrity Line](#) or the Compliance Hotline in your country

## Ethical Decision-Making Guide

Acting ethically is vital to our success and our reputation.

Use this guide to help you make ethical decisions. If you don't know the answer to a question, ask for help.





## What Should I Do?

I was at an industry event, and a physician I see regularly thanked me for the football tickets a McKesson employee gave him. He told me he would use and recommend our products more.

I'm not sure who sent him the tickets. I think this could violate our policies and maybe some laws, but I am not sure.

### What should I do?

Follow the steps in the decision-making guide to determine what to do.



#### 1. Am I sure this course of action is legal?

*You are not sure, so you should ask someone from the Law Department.*



#### 2. Does it follow the Code and applicable policies?

*Providing entertainment to a healthcare professional violates McKesson's policies.*



#### 3. Does it align with I<sup>2</sup>CARE in Action?

*It seems like it could be perceived as an attempt to improperly influence a physician, which would not align with our I<sup>2</sup>CARE values.*



#### 4. Is it consistent with McKesson's ethical reputation?

*If one of our stakeholders heard about this, it could hurt our reputation.*

You should report it to any of the [Speak Up Channels](#).



## What Should I Do?

I work in Sourcing. The Marketing Department is looking for a print vendor, and I'm in charge of the Request for Proposal (RFP). I have several print vendors on the list, including my college roommate's husband who is one of the best printers in the area.

### Is it okay to get a proposal from him?

Follow the steps in the decision-making guide to determine what to do.



#### 1. Am I sure this course of action is legal?

*Unclear — in some circumstances it is not legal to do so. You should contact the Law Department.*



#### 2. Does it follow the Code and applicable policies?

*Are you the final decision maker? If so, it may not align with our policies.*



#### 3. Does it align with I<sup>2</sup>CARE in Action?

*It may not reflect our I<sup>2</sup>CARE values because this situation could create a potential conflict of interest.*



#### 4. Is it consistent with McKesson's ethical reputation?

*When it could appear that you have engaged in business with someone due to a personal relationship, it could look like you are showing favoritism or personally profiting. This could hurt our reputation.*

You must promptly disclose the potential conflict of interest in writing to the Compliance Department. It may still be appropriate for McKesson to obtain a proposal from your friend's company. However, there are actions McKesson may want to take to avoid any appearance of misconduct or improper influence.



## Consequences of Noncompliance

Our commitment to I<sup>2</sup>CARE in Action means that each of us must follow our Code, McKesson policies and the law.

Noncompliance can lead to serious consequences, including:

- Company and individual prosecution and fines
- Government sanctions
- Patient harm
- Loss of business
- Reputational damage
- Disruption of business

## Disciplinary Action

Failure to follow the Code, McKesson policies, and/or applicable laws and regulations could lead to disciplinary actions, up to and including termination.

Examples of conduct that could result in disciplinary action include:

- Violating the Code, a McKesson policy or the law, or requesting that others do the same
- Retaliating against another employee for raising a concern and/or participating in an investigation
- Failing to promptly Speak Up about a concern when there is an obligation in the Code to do so
- Failing to cooperate fully and honestly in investigations
- Failing as a People Leader to take prompt action to escalate a concern



## Seeking Help and Speaking Up

Consistent with our I<sup>2</sup>CARE values, we promote an environment where employees feel empowered and comfortable discussing questions and raising concerns.

### Seeking Help

Seek help and ask questions through one of the [Speak Up Channels](#) if:

- You cannot find an answer in the Code, a McKesson policy or a procedure
- You have questions on how to interpret the Code, a McKesson policy or a procedure
- You need guidance on a decision or course of action
- You have a general compliance question

There are several [Speak Up Channels](#) available to you if you need help or have questions:

- Any People Leader
- The Compliance Department
- The Human Resources Department or the U.S. Human Resource Support Center
- The Law Department
- McKesson Hotlines\*

Specific contact information can be found on McKNet.

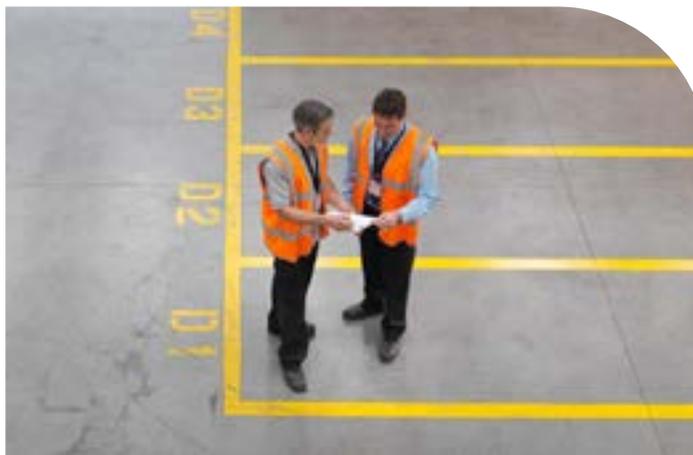
\*McKesson's Integrity Line for U.S., Canada, Rest of World (excluding Europe) and the Compliance Helpline for Europe

### Speaking Up

Raising compliance and integrity concerns strengthens McKesson's ethical culture and protects our company, customers, patients and each other. When we are open and candid about our concerns, we become role models for others to [Speak Up](#) and create a safe environment to do so.

You have an obligation to promptly raise a concern if you have reason to believe a violation of the Code, our policies and procedures, and/or the law has occurred. If in doubt, [Speak Up](#).

If you are a People Leader, you must create a safe space for employees to raise concerns without fear of retaliation. Listen to your employees' concerns and address those concerns appropriately. Immediately escalate any employee concerns about potential violations of the Code, McKesson policies and procedures or the law to the Law Department, Compliance Department, Human Resources or to McKesson Hotlines.



### Remaining Anonymous

McKesson knows that raising a concern may be difficult. We understand that for personal or other reasons, you may not want your identity to be known. You can report any concern anonymously through McKesson Hotlines. It is important to provide as much detail as possible to enable a full review of the concern.



### Confidentiality

McKesson is committed to confidentiality in the [Speak Up](#) process. Regardless of which [Speak Up Channel](#) you use to raise a concern, McKesson will keep your identity and the information you provide as confidential as possible under the circumstances and consistent with the need to conduct a thorough investigation. This means information you provide will be shared only with those who have a need to know. In some instances, information may need to be shared with government agencies or to meet other legal obligations.



## Our Commitment to Non-Retaliation

To ensure you feel comfortable raising concerns, asking questions, seeking guidance or participating in an investigation, McKesson will not tolerate any form of retaliation for doing so. We will also respect and provide protection to whistleblowers.

Rights and remedies for whistleblowers are also protected under applicable whistleblower laws, which may not be waived by any agreement, policy form or condition of employment, including by a pre-dispute arbitration agreement. Even if you have participated in a possible violation of the law, you may be eligible to participate in the confidentiality and retaliation protections afforded under applicable whistleblower laws, and you may also be eligible to receive an award under such laws.

Retaliation in any form will be subject to discipline, up to and including termination. If you experience or are concerned about retaliation, raise the issue immediately through any of the [Speak Up Channels](#).



### Retaliation

The following actions could be considered retaliation if they were taken because an employee raised a concern or cooperated in an investigation:

- Terminating, demoting or suspending
- Threatening or bullying
- Denying a promotion, pay raise or benefit
- Giving negative performance reviews
- Changing job duties or work schedule
- Setting unrealistic or burdensome expectations

## How to Contact McKesson Hotlines

### McKesson Hotlines

McKesson Hotlines are operated by independent third parties, and they are available 24 hours a day, seven days a week with operators available in multiple languages.

Anyone in or outside of McKesson can use the Hotlines to raise an anonymous concern.

### McKesson's Integrity Line for U.S., Canada and Rest of World (excluding Europe)

You can access the Integrity Line by phone or web:



Phone: **1.877.625.4625**



Online: <http://integrity.mckesson.com>

\*Local toll-free numbers for locations outside the U.S. are listed at [integrity.mckesson.com](http://integrity.mckesson.com).

### Compliance Helpline for Europe

You can access the Ombudsman by phone, web or email:



Phone: **00800 – OMBUDSMAN** or **00800 – 66283762**  
(toll-free from any McKesson Europe country)



Fax: **+49(0)521.557333-44**



Email: [ombudsman@thielvonherff.com](mailto:ombudsman@thielvonherff.com)



## How We Handle Concerns

We take all concerns of potential violations of the Code, McKesson policies or the law seriously. We will promptly, objectively and thoroughly investigate all concerns.

The information you report will be treated as confidential and shared on a “need to know” basis. McKesson may be required by law to report certain types of concerns, in some cases without first being able to conduct our own investigation.



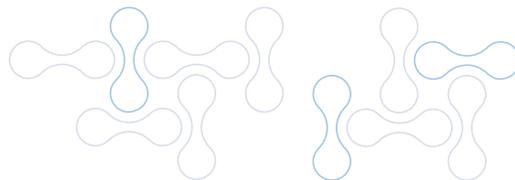
### Speak Up Channels

You can ask a question or raise a concern by contacting any of the following:

- Any People Leader
- The Compliance Department
- The Human Resources Department or the U.S. Human Resource Support Center
- The Law Department
- McKesson Hotlines\*

\*McKesson’s Integrity Line for U.S., Canada, Rest of World (excluding Europe) and the Compliance Helpline for Europe

In some countries, local laws may limit the types of concerns raised via the Hotlines. In these cases, please contact the other resources above to raise a concern.



## Participating in Investigations

You must fully cooperate with investigations of potential or actual violations of the Code, McKesson's policies or the law.

Always give accurate and complete details to investigators. Do not make untrue or misleading statements or encourage anyone else to do so.

Government agencies may request information from McKesson. You may receive communications from the Law Department, Compliance Department or your People Leader related to information believed to be in your possession that may be relevant to an investigation or subject to legal hold. You must ensure you follow the directions and preserve those materials. You must not destroy, conceal or change those materials in any way.

At times, a government official may contact an employee directly as part of an inquiry or investigation. McKesson's policy is to follow the law and to cooperate with government investigations. To ensure McKesson properly responds to a government inquiry or investigation, immediately contact the Law Department or Compliance Department if you receive any non-routine inquiry, a subpoena or other legal document regarding McKesson's business.

We hope you will take advantage of the resources available to you; however, nothing in our Code prevents you from reporting possible violations of a federal or state law or regulation to any governmental agency or entity, or from participating in any proceedings or investigations with the federal, state, or local government agency, or entity responsible for enforcing these laws. McKesson's non-retaliation policy protects you, in all instances, regardless of whether you report to a governmental agency or entity and/or if you report it within McKesson.

## Investigation Process Overview

Once a concern is raised, McKesson will take steps including:



Assigning an objective investigator, taking care to avoid potential conflicts of interest



Reviewing key information and conducting interviews of relevant parties



Recommending corrective actions or disciplinary actions as necessary and appropriate



Supporting the person who raised the concern (if known)



Promptly addressing any concerns about retaliation



## Waivers and Exceptions

We will only grant waivers to this Code when necessary. The terms will be limited to protect McKesson. All waivers require written pre-approval. The General Counsel, Chief Compliance Officer or their designees have the authority to grant waivers or exceptions. Any waiver of a provision of this Code for executive officers or directors may only be granted by the Board of Directors, and we will disclose all waivers for directors and executive officers as required by law.





# Our People

## Embracing a Respectful Workplace

We succeed when our employees feel included, empowered and have a true sense of belonging.

We fulfill our I<sup>2</sup>CARE values by fostering a respectful and inclusive culture where everyone feels comfortable being themselves at work every day.

### Why We Care

McKesson is an equal opportunity employer. We are committed to fair and non-discriminatory treatment of all employees and those applying for employment.

We follow all laws and regulations regarding equal employment opportunity and the prevention of discrimination and harassment. We do not tolerate discrimination against anyone, and employees who violate these laws and policies are subject to disciplinary action. Violations may also subject McKesson to legal liability and may harm our reputation in the marketplace.

### Embracing Diversity and Inclusion

We empower our employees to do their best by valuing their diverse backgrounds and ideas. We create our inclusive culture by:

- Recruiting and retaining qualified people from a broad range of backgrounds
- Encouraging different points of view
- Being open and honest in actions and communications
- Treating everyone with dignity and respect



### Diversity

Diversity means our employees come from all races, gender identities, lifestyles and backgrounds. Inclusion means we support, welcome and appreciate differences in identity, background, lifestyle and perspectives.

We believe the contributions of all team members are valuable — generating the creativity, vitality, trust and openness that makes McKesson a place to work comfortably and with pride.



## Preventing Workplace Harassment

Harassment can create a hostile work environment and impact our ability to work together and participate in high-performing teams. We maintain a working environment free from harassment by anyone including People Leaders, coworkers, vendors, contractors or customers.

We do not tolerate harassment, and we follow applicable laws prohibiting harassment.



### What does harassment look like?

Harassment can take many forms including:

- Inappropriate behavior in verbal, physical, visual or written form
- Offensive comments and jokes
- Racial, ethnic, gender identity, sexual orientation or religious slurs and insensitive terms
- Degrading or inappropriate comments about an individual's age, religion, race, ethnicity, sexual orientation or gender identity
- Displaying materials that show hostility toward a person or group
- Intimidating or threatening behavior
- Unwelcome sexual advances, remarks or requests for sexual favors, including to anyone over whom an individual maintains a position of influence
- Displaying or sharing sexually suggestive photographs or objects
- Bullying and cyberbullying



### What Should I Do?

A coworker told me that their People Leader has been pressuring them to go on a date. They are not interested and are avoiding the People Leader because they do not want to turn the People Leader down. They fear the People Leader will become angry.

#### Is there anything I should do?

*Encourage your coworker to share their concerns with the Human Resources Department or a McKesson Hotline, both of which are [Speak Up Channels](#). Remind your coworker of McKesson's policy on non-retaliation. If your coworker is unwilling or concerned about speaking up, you should report the matter yourself — either directly or anonymously.*

I can tell my colleague is upset by other individuals in the department who repeatedly make racially derogatory statements, even after they were asked to stop.

#### Should I mind my own business?

*No. It's clear that these statements are inappropriate, and the behavior has continued even though the individuals were asked to stop. You may share your concern with any People Leader, HR or a McKesson Hotline, all of which are [Speak Up Channels](#). You are protected from retaliation for speaking up in all of these ways.*



## Preventing Discrimination

We are committed to providing equal opportunities for all applicants and employees, and we do not tolerate discrimination in any aspect of employment.

We all benefit from our ability to attract the best talent. That means, employment decisions such as recruiting, hiring, promoting, training or compensation are made on job qualifications and individual merit, including education, experience, skills and performance.

We follow applicable employment laws related to:

- Freedom of association
- Collective bargaining
- Immigration
- Wages and hours



### What does discrimination look like?

Unfairly treating an individual in an employment decision (such as hiring, terminations, promotions and transfers) because of non-job-related characteristics, including:

- Race, color or ethnicity
- Citizenship, ancestry or national origin
- Disability
- Sex, gender, sexual orientation or gender identity
- Marital status
- Pregnancy
- Age
- Religion
- Veteran status
- Any other legally protected non-job-related characteristics

## Examples of I<sup>2</sup>CARE in Action



### DO:

- ✓ Promote diversity in your teams and in your decision-making
- ✓ Treat everyone with dignity and respect
- ✓ Support open and candid discussions, and listen to all viewpoints with respect
- ✓ Speak Up if you feel anyone is being excluded or treated disrespectfully
- ✓ Promote a work environment free from harassment
- ✓ Speak Up if you witness or experience harassment
- ✓ Make employment decisions based on job qualifications



### DON'T:

- ✗ Disparage someone personally because your ideas or experiences differ
- ✗ Say or do anything that others may find offensive, degrading or threatening
- ✗ Act in a harassing manner
- ✗ Make an inappropriate sexual advance to a colleague
- ✗ Make employment decisions, or treat individuals unfairly based on non-job-related characteristics



Care to Learn More





## Keeping Workplaces Safe, Healthy and Secure

We are committed to promoting the safety, health and security of our people, operations and assets. We fulfill our I<sup>2</sup>CARE values by providing safe work environments free from hazards, substance abuse and violence. Safe work environments are a top priority, and they create the foundation for success at McKesson.

### Why We Care

At McKesson, we are responsible for providing safe products that promote healthy outcomes for patients. Safe work environments protect our assets, employees, patients and reputation.

We follow all applicable laws and take proactive measures to prevent, detect and respond to security risks. We also expect all employees and partners to follow safety laws and policies. Anyone who violates them may be subject to disciplinary action and potential legal liability.

We do not tolerate substance abuse or any form of violence in the workplace.



### Ask Yourself

Safety is everyone's responsibility. If you have a concern about potentially unhealthy or unsafe conditions or activities, you must report them immediately.

If you can answer "yes" to any of these questions, [Speak Up](#).

- Did we fail to follow written procedures?
- Are there workplace hazards?
- Is there damaged or unsafe equipment?
- Did someone fail to use protective equipment?
- Did someone use or have faulty protective equipment?
- Did an injury occur in the workplace?
- Have you witnessed unsafe behaviors?



## Managing Security and Crises

We should always be prepared to handle a crisis event. In the event of a crisis, we work with local officials and resources to safeguard our employees and patients.

We are committed to maintaining our security and safety standards by deploying a crisis management plan.



### Crisis

A crisis in the workplace could be any event that puts our people, our assets or our reputation at risk. Some examples of crises include:

- Security threats, such as bomb threats or workplace violence
- Health threats, such as chemical spills
- Natural disasters, such as hurricanes and floods
- Cyberattacks, such as malware or data compromises

## Preventing Substance Abuse in the Workplace

As a leading provider of services dedicated to improving healthcare, we promote and maintain a work environment free from the effects of substance abuse. We do not tolerate substance abuse in the workplace because it can impair workplace safety, individual judgment, performance and health.

During authorized company events or at special occasions, alcohol may be available to drink in moderation, but employees are expected to act appropriately and professionally during such occasions.



## What happens if I use or sell substances at work or come to work impaired?

You will be subject to disciplinary action, up to and including termination if you do any of these things:

- Come to work under the influence of alcohol
- Come to work under the influence of illegal drugs, drugs for which you do not have a valid prescription or misused drugs for which you have a valid prescription
- Have illegal drugs in your possession
- Sell or buy illegal drugs
- Have a verified positive drug test



### Impaired

"**Impaired**" means being mentally or physically unable to adequately perform your assigned work duties.

### Under the influence

"**Under the influence**" means having the presence of a drug or alcohol at or above the level of a positive test result.

### Assistance with Substance Abuse

If you need help with or treatment for substance abuse, do not be afraid to ask for help. Contact your healthcare professional or the Human Resources Department to discuss questions or concerns about substance abuse. You can also contact the Employee Assistance Program helpline.



## Preventing Workplace Violence

We are committed to providing a work environment that is free from violence or threats of violence, including threatened or actual destruction of personal or McKesson property.

Awareness and preparedness are essential to preventing workplace violence incidents. Be alert to what is going on around you, observe security practices and Speak Up about any concerns of potential violence. You must immediately report any threatening or violent behavior.

We don't tolerate verbal or physical violence or threats of any kind including threats that may occur outside work or on social media.



### Workplace Violence

Workplace violence is any behavior that causes fear, intimidation or physical injury including:

- Written, verbal, electronic or physical threats
- Acts of intimidation or abuse
- Destruction of personal or McKesson property
- Physical assault



### What Should I Do?

My ex-spouse is stalking and threatening me. My ex used to work here, and we still have mutual friends who work here. I don't want to make my personal life the topic of gossip or risk angering my ex.

#### What should I do?

*Notify law enforcement if you feel you are in immediate danger. Discuss your situation with the Human Resources Department, the Global Security Department, McKesson Hotlines or any other Speak Up Channel.*

Reporting the issue enables McKesson to assess the situation and take steps to protect your safety and the safety of other employees.



## Examples of I<sup>2</sup>CARE in Action



### DO:

- ✓ Notify law enforcement if you feel you are in immediate danger
- ✓ Understand and follow health and safety policies and procedures that apply to your role and your location
- ✓ Wear required personal protective gear and know how to operate machinery properly
- ✓ Immediately report potentially unhealthy or unsafe conditions
- ✓ Follow procedures on responding to workplace emergencies
- ✓ Report any act of violence you experience or witness
- ✓ Know your surroundings and be alert to potential security issues
- ✓ Follow all security procedures at your location, including entry and exit procedures
- ✓ Report any security concerns or any unusual or suspicious activity immediately
- ✓ Attend security awareness and training programs
- ✓ Report any drug abuse you witness



### DON'T:

- ✗ Work without being aware of your surroundings and safety risks
- ✗ Take shortcuts, bypass health and safety policies and procedures, or ask others to do so
- ✗ Take any action or perform any task that endangers the life or safety of yourself or another person
- ✗ Engage in physical or verbal violence
- ✗ Confront any individual who is making a threat
- ✗ Destroy McKesson property
- ✗ Bring any firearms or weapons on McKesson property, except in jurisdictions that expressly permit weapons in vehicles only
- ✗ Share any information with unauthorized non-McKesson personnel about security protocols
- ✗ Work while impaired by drugs or alcohol
- ✗ Bring illegal drugs onto McKesson property



Care to Learn More



# Our Customers

## Marketing and Selling Ethically

We protect our reputation as a trustworthy business partner by marketing and selling McKesson's products and services with honesty, integrity and in compliance with all applicable laws and regulations.

We make accurate claims about our products, services and capabilities to ensure clinicians, customers and patients can make informed decisions.

### Why We Care

We honor our I<sup>2</sup>CARE values by delivering differentiated value in the marketplace. Marketing and selling with integrity builds trust with customers, enables our success and ensures the integrity of patient care. We want customers to choose McKesson for the right reasons — because McKesson delivers value, not because of any undue influence or improper practices.

### Examples of I<sup>2</sup>CARE in Action



#### DO:

- ✓ Provide accurate, complete and truthful information when discussing our offerings
- ✓ Understand there are strict regulations around financial arrangements in the healthcare industry
- ✓ Follow applicable laws and McKesson policies for product labeling, advertising and promotion



#### DON'T:

- ✗ Make false, misleading or unapproved representations about our offerings
- ✗ Promote off-label uses of products



## Ethical Interactions with Our Customers and Governments

We collaborate with our customers in a manner that does not have or appear to have any improper influence on business decisions. We apply high ethical standards to these relationships and comply with applicable laws, regulations and industry standards governing these interactions. We Speak Up if we have concerns about potential violations.

### Why We Care

Ensuring our interactions with customers are ethical in all contexts enables our purpose of advancing health outcomes for all and helps us earn customer, patient and regulator trust. McKesson plays a unique role in delivering products and services that are cost effective, high-quality and accessible.

### Interactions with Healthcare Providers

Above all, we respect and do not interfere with the unique duty of care that Healthcare Providers have to their patients. The relationship a patient has with their provider is sacred. Ethical interactions with Healthcare Providers allow us to improve care in every setting — one product, one partner, one patient at a time – while still respecting the provider/patient relationship.

We comply with laws intended to protect against improper inducement, fraud, waste and abuse in healthcare.

### Interactions with Government Officials

Around the world, healthcare is a significant part of the economy and is fundamental to the wellbeing of all. As such, governments play a vital role in funding and ensuring the integrity of healthcare. We respect the important role governments play in healthcare.

We interact with Government Officials professionally in an ethical manner and in compliance with applicable laws and regulations in every country where we do business. We follow all local policies and requirements when interacting with federal, state and foreign Government Officials.



### Healthcare Provider

The term “**Healthcare Provider**” refers to any person or entity in the position to prescribe, purchase, recommend, administer or arrange for the use of a McKesson product or service. This includes doctors, nurses, pharmacists, other licensed healthcare professionals, referral sources and others who can make decisions regarding the purchase of McKesson's products or services such as administrators, purchasing managers and other relevant staff.



### Government Official

The term “**Government Official**” refers to any officer or employee of a federal, state or foreign government. This includes elected officials, candidates for political or elected government office, and individuals acting temporarily in an official capacity for or on behalf of any government entity. This may also include officers or employees of a government-owned hospital or clinic, or other government-controlled company.

Finally, it is important to recognize that in many jurisdictions, individuals engaged in various activities such as law enforcement, customs clearance, permit and license issuance, tax and regulatory monitoring may meet the definition of a Government Official. In some countries, Healthcare Providers are also considered Government Officials.





## Remember:

What is acceptable in the commercial business environment may be not be acceptable when interacting with Government Officials or Healthcare Providers. Always follow local policies and requirements when interacting with Government Officials, Healthcare Providers and customers. Speak Up if you have concerns about a potential violation.



## Preventing Bribery, Improper Inducements and Corruption

We do not tolerate bribery, improper inducements or corruption in our business practices. We do not accept, promise, offer or give anything of value (or create the appearance of such misconduct) to a Healthcare Provider, Government Official, customer, business partner or patient with the intent to improperly influence their judgment or otherwise obtain an unfair business advantage for McKesson. This includes improper attempts to obtain favorable treatment from a Government Official.

We expect our business partners working on our behalf to follow all applicable anti-corruption laws and standards.

We follow all applicable anti-corruption laws in the countries in which we operate.

### Examples of I<sup>2</sup>CARE in Action



#### DO:

- ✓ Know how to recognize and avoid a bribe or improper inducement
- ✓ Record business expenses and payments accurately and completely
- ✓ Follow screening policies and procedures before hiring business partners



#### DON'T:

- ✗ Give anything of value to a customer or Government Official to improperly influence their actions or purchasing decisions
- ✗ Use a business partner to indirectly make improper inducements that McKesson is restricted from giving directly
- ✗ Associate with or hire business partners whom you suspect may attempt to engage in bribery or corrupt activities



### Improper Inducement

The term “**Improper Inducement**” means promising, giving or offering anything of value with the intent to improperly influence the behavior of a Healthcare Provider, Government Official, customer or business partner or to improperly assist McKesson in obtaining or retaining business.



## Improper inducements are prohibited.

It is important to understand that an improper inducement can take many forms and is not always in the form of a payment.

Here are some examples of interactions or arrangements with Healthcare Providers or Government Officials that could be improper if not structured appropriately:

- Cash, gift cards (including ecards) and other cash equivalents
- Gifts
- Meals
- Entertainment
- Travel and lodging
- Other business courtesies
- Compensation for consulting arrangements, speaker programs or participation on advisory boards
- Grants or donations
- Charitable contributions
- Research arrangements
- Payments or transfers of value to family members
- Hiring customer's relatives

Laws, regulations and industry standards restrict or limit the types of interactions with Healthcare Providers and Government Officials. These interactions must have a legitimate business need, be modest in value and venue, follow applicable requirements and be appropriately documented. Always check local policies for specific requirements.

**Speak Up** if you are concerned about any possible violations.

## Transparency Laws

We comply with laws, regulations and industry codes that require reporting of interactions with Healthcare Providers and healthcare institutions. This includes the Sunshine Act and state marketing and transparency laws that are in place to help ensure that there is visibility to covered interactions.

If you interact with a Healthcare Provider as part of your McKesson role, you are required to provide complete and accurate reports of any payments or transfers of value. Incomplete or inaccurate reporting may expose McKesson to significant legal risks.



Care to Learn More



## Conducting International Trade Compliantly

We value our ability to source and distribute quality products and services around the globe. We comply with applicable laws and regulations that protect and promote fair and safe international trade.

### Why We Care

Laws regulate where, when and how we may import and export our products. Following these laws helps maintain our reputation for operating with fairness, honesty and integrity and helps protect the supply chain and, ultimately, healthcare products for patient care. We only work with suppliers and business partners who follow these laws. If we violate these laws, we may be subject to civil and criminal penalties and lose our trade privileges.

### Examples of I<sup>2</sup>CARE in Action



#### DO:

- ✓ Follow all business procedures relating to imports and exports
- ✓ Follow all screening, due diligence and onboarding procedures for suppliers and third parties
- ✓ Report accurate, complete and timely information on all import declarations
- ✓ Provide accurate and complete product descriptions when classifying goods
- ✓ Confirm all necessary licenses or authorizations are in place before any export transaction
- ✓ Always know what you are exporting, its destination, the end user and the intended use



#### DON'T:

- ✗ Allow shipments to be sent to a different destination than originally planned
- ✗ Do business with sanctioned countries or regions without written Law Department approval
- ✗ Do business with entities or individuals that are on restricted parties lists without written Law Department approval



### What types of laws impact international trade?

International trade laws include:

- **Customs Laws** that regulate the movement of goods across borders
- **Export Control Laws** that regulate cross-border transfers of goods, software and technology for national security or trade-protection reasons
- **Sanctions**, such as embargoes and boycotts that restrict or prohibit trade in goods and services

International trade laws create the rules that countries and businesses must follow to do business across borders. You need to be aware of these laws, especially if you do any of these activities:

- Source products outside of the United States
- Ship or sell products for shipment across borders
- Repackage products imported from another country
- Engage in electronic transfers of information across borders

Contact the Law Department or the Compliance Department for additional guidance.



Care to Learn More



## Competing Honestly and Fairly

We compete honestly and fairly. We comply with applicable laws and regulations that promote fair competition. When we are successful commercially, it needs to be on the basis of an arms-length relationship.

We do not tolerate or participate in any business conduct, transaction or activity that violates antitrust and competition laws of any country where we do business.

### Why We Care

We value a fair marketplace where we compete to sell superior services and quality products at competitive prices and credible value propositions. Winning business with integrity is at the heart of our I<sup>2</sup>CARE values.

### Examples of I<sup>2</sup>CARE in Action



#### DO:

- ✓ Avoid interactions with competitors that could create the appearance of improper behavior
- ✓ Follow any confidentiality and non-disclosure agreements
- ✓ Respect our competitors' rights regarding their confidential information
- ✓ Disclose immediately to the Law Department if you become improperly aware of any competitive information
- ✓ Contact the Law Department before joining or otherwise participating in a trade association, standard setting organization or discussing a joint venture



#### DON'T:

- ✗ Discuss pricing policies, discounts, contract terms or sales and marketing strategies with competitors
- ✗ Agree with competitors to fix prices, rig bids, set wages or hiring policies, or otherwise allocate markets, territories or customers
- ✗ Limit distribution channels in an illegal manner or boycott a customer or supplier
- ✗ Ask a customer or any party to breach a non-disclosure agreement with our competitor
- ✗ Attempt to acquire or act on competitive information or trade secrets obtained through improper means
- ✗ Obtain confidential information from former employees of competitors



### Antitrust and Competition Laws

Fair competition and antitrust laws promote healthy competition and protect consumers. While these laws are complex, they are designed to ensure that businesses compete fairly on the basis of quality, price and service.

### Competitive Intelligence

We value fair and open competition, and we only gather competitive information through legal and ethical means. We do not collect information about our competitors through deception, manipulation or misrepresentation.

Consult with the Law Department or Compliance Department if you have questions or concerns about antitrust, competition or competitive information.



Care to Learn More



## Anti-Money Laundering and Terrorist Financing

We conduct business with customers whom we believe to be engaged in legitimate business activities, and with funds derived from legitimate sources. We will not participate in illegal transactions to launder money, and we will not work with criminals who engage in terrorism or other illegal acts.

### Why We Care

Anti-money laundering and terrorist financing laws and regulations aim to prevent criminals and terrorists from financing their operations through illegal transactions. We are committed to preventing money laundering and terrorist financing activities.



Care to Learn More



### What is money laundering and terrorist financing?

**Money laundering** refers to an activity to hide the proceeds of a crime or create an appearance that illegal funds are legitimate.

**Terrorist financing** means funding transactions that could be used to carry out acts of terrorism or financially support terrorists.

Both are serious crimes under federal law. A violation can result in imprisonment and fines.



### Red flags of potential money laundering or illegal activities include:

- Unusually complex deal structures
- Unusual fund transfers to or from countries unrelated to the transaction
- Orders, purchases or payments that are unusual or inconsistent with the customer's line of business
- Offers to pay or payments received in cash
- Overpayments followed by requests for refunds
- False information provided by a customer
- Payments from entities other than the ones with whom we would expect to transact



# Our Relationships with Governments

## Regulatory Excellence

A wide range of complex and evolving regulatory requirements apply to our business operations. We fulfill our I<sup>2</sup>CARE values with regulators and maintain our position as a trusted market leader by complying with the laws and regulations that apply to us.

We are committed to regulatory excellence in all matters that impact our business, operations and communities.

### Why We Care

We share an interest with healthcare regulators and other industry stakeholders to improve health outcomes, make high-quality healthcare more accessible and affordable, and to ensure high-quality healthcare products and services are available. Regulatory excellence allows us to provide the right healthcare products and services at the right time — safely and cost effectively.



**We are committed to regulatory excellence in every aspect of our business operations, including:**



#### Service and Product Quality

McKesson has built a reputation around excellent services and the distribution of high-quality, safe products. We design our quality management systems to promote the safe handling, distribution, and service of products. We expect our suppliers to maintain high-quality standards for the products and services they provide to us.



#### Controlled Substances and Anti-Diversion

We maintain strong controls to guard against the theft and diversion of regulated chemicals and controlled substances. We are partnering with others to deploy the best thinking on diversion of controlled substances and to advance meaningful solutions.



#### Government Price Reporting/Billing for Services

We follow applicable laws and regulations related to reporting accurate and complete pricing information to government agencies. Similarly, we maintain controls designed to ensure accurate billing for products and services reimbursed by government programs.



#### Exclusion Screening for Employees, Vendors and Customers

We do not employ or contract with individuals or entities that are excluded, suspended, debarred or ineligible to participate in government healthcare programs.



#### Regulatory Inspections, Audits and Investigations

We cooperate fully with all regulatory inspections, audits and investigations. We treat regulators professionally, with courtesy and respect at all times.

If you are contacted by an outside government agency about an inspection, audit, investigation, or other request for you or McKesson to provide information, notify the Law Department or the Compliance Department immediately.

If you receive requests for information from the Law Department and/or the Compliance Department, respond quickly and provide all relevant information.





## Controlled Substances and Anti-Diversion

McKesson is committed to maintaining — and continuously enhancing — strong programs designed to prevent and detect diversion within the supply chain. We have established policies, procedures and analytics designed to monitor for suspicious orders, block the shipment of controlled substances to customers when certain thresholds are reached, and report blocked orders to the U.S. Drug Enforcement Administration. Our processes include conducting due diligence on potential customers, monitoring customer orders of controlled substances for potential diversion, and implementing stringent security procedures and controls.

## Examples of I<sup>2</sup>CARE in Action



### DO:

- ✓ Be familiar with the regulators, laws, regulatory requirements and internal policies that apply to your role
- ✓ Consider your actions from a regulator's and the public's point of view
- ✓ Provide complete and accurate information for any transactions, such as billing or reports to be submitted to government agencies
- ✓ Cooperate and/or support investigations



### DON'T:

- ✗ Ignore controls or take steps that compromise the quality or safety of our products and services
- ✗ Take shortcuts with our policies and processes



## Working with Governments

We follow high ethical standards when conducting business with governments. We comply with all laws and regulations related to pursuing government business and performing government contract obligations.

### Why We Care

What is acceptable in the commercial business environment may not be acceptable when interacting with government customers and payors. This includes specific business practices and individual financial arrangements or other contributions to political candidates or elected officials. The laws and regulations that apply to these activities are complex.

Contact the Law Department or Compliance Department for additional guidance.



### Marketing and Selling to Governments

We value our ability to compete fairly when providing goods and services to government customers. There are laws to protect the integrity of government purchasing, covering topics that include:

- Seeking new business opportunities
- Bidding and negotiating contracts
- Developing relationships with government employees
- Retaining documents and other records relevant to our government contracts
- Hiring current or former government employees

Always consult with the Law Department when marketing and selling to government customers. When conducting business with government customers, we must also guard against improper influence and abuse, including any appearance of inappropriate conduct.

### Examples of I<sup>2</sup>CARE in Action



#### DO:

- ✓ Perform all contract obligations in accordance with the terms of the agreement
- ✓ Keep accurate records relating to government contract performance



#### DON'T:

- ✗ Seek government business without involving the Law Department
- ✗ Offer or provide anything of value to influence Government Officials
- ✗ Hire current or former Government Officials without pre-approval from the Law Department



Care to Learn More



# Political Contributions and Political Activities

We express our views to governments and policy leaders transparently, ethically and in compliance with laws. As individuals, we separate our personal political activities from our work at McKesson.

## Why We Care

We value a system where each of us is free to express our political voice with respect. We comply with applicable laws related to political contributions and activities.



## Political Contributions

Laws or other policies may restrict or require the reporting of personal political contributions made by McKesson’s employees and their families if attributable to McKesson.

Do not use McKesson’s time, resources or facilities for personal political activity.



## Lobbying and Advocacy Activities

Federal, state and local laws exist to prevent the improper influencing of public officials and to restrict how a company and its employees participate in the political process.

Notify the Public Affairs Department or the Law Department before engaging in political or lobbying activity on behalf of McKesson.

## Examples of I<sup>2</sup>CARE in Action



### DO:

- ✓ Consult with Public Affairs or the Law Department before engaging in any lobbying, advocacy or political activities as a part of your McKesson role
- ✓ Disclose all McKesson expenses on advocacy and communication on behalf of McKesson with Government Officials



### DON'T:

- ✗ Create the impression that McKesson supports, requires or guides your personal political activities
- ✗ Use McKesson’s funds to support a political party, candidate or ballot measure without prior approval from Public Affairs
- ✗ Speak to or advocate for political officials on behalf of McKesson in any setting without consulting first with Public Affairs and the Law Department



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# Our Company

## Avoiding Conflicts of Interest

We each have a duty to ensure that we act in McKesson's best interest. A conflict of interest occurs when a personal interest may affect your business objectivity or loyalty to McKesson. You should avoid any activities that create an actual or potential conflict of interest, or the appearance of one.

### Why We Care

Conflicts of interest could harm our business and our reputation. When performing your job, always put McKesson's interests before any personal interest.



### What are some examples of conflicts of interest?

Below are examples of actual or potential conflicts of interest:

- **Personal relationships:** Supervising, hiring or conducting business with a person with whom you have a personal relationship, such as a family member
- **Outside activities that conflict with McKesson interests:** Work or association with (apart from your work for McKesson), or a material financial interest in, an organization that is in the healthcare industry, a customer or other business partner
- **Outside business activities:** Self-employment, consulting, a second job, or serving on a board of directors, or any other outside business activities that might interfere with your job performance at McKesson
- **Use of McKesson assets:** Using, leveraging or referencing McKesson's resources or brand for personal gain
- **Accepting gifts:** Receiving a gift or business courtesy that could create the appearance of a conflict of interest



### Disclosing Actual or Potential Conflicts of Interest

The best way to address an actual or potential conflict of interest is to disclose it. Disclosure allows us to review and attempt to manage the actual or potential conflict. Disclosure is always the best way to avoid even the appearance of a conflict. Failure to report conflicts of interest can result in disciplinary action, up to and including termination. You must report activities or situations that could involve an actual or potential conflict of interest to the Compliance Department or the Law Department.

**Remember:** A conflict of interest may not always violate McKesson's policies, but disclosure is always required.

#### Ask Yourself

- Could the activity or situation affect my McKesson job?
- Could the activity keep me from making decisions that are best for McKesson?
- Is it possible I might use or reference McKesson's assets or brand?
- Am I or a family member benefitting personally from the situation, or could it appear that way?
- Could the situation potentially give another party an unfair advantage?

### Examples of I<sup>2</sup>CARE in Action



#### DO:

- ✓ Disclose any actual or potential conflict of interest
- ✓ Contact the Compliance Department or the Law Department if you aren't sure there is an actual or potential conflict of interest



#### DON'T:

- ✗ Engage in undisclosed business relationships that may impact your decisions affecting McKesson
- ✗ Use McKesson's resources for personal gain



Care to Learn More



## Accepting Gifts and Business Courtesies from Business Partners

The exchange of appropriate gifts or entertainment can be a part of conducting legitimate business. However, accepting gifts or entertainment from business partners can also create a conflict of interest or an appearance of misconduct.

It may be appropriate to accept modest business courtesies, such as a meal, gift or other item of value if the business courtesy meets acceptable criteria and is in line with local policies and limits.

Please note that the rules for **giving** business courtesies may vary for Healthcare Providers, customers or Government Officials "[Ethical Interactions with Our Customers and Governments](#)."



### What are the criteria for acceptable business courtesies?

An acceptable business courtesy is one that:

- Is infrequent
- Cannot be perceived as an attempt to improperly influence a business decision
- Does not make you appear biased
- Is modest in cost
- Is not cash, a gift card or other cash equivalent
- Occurs in a place appropriate for a business discussion
- Would not embarrass you or McKesson if publicly known
- Meets criteria in local policies or laws for your country

### What are some examples of acceptable business courtesies?

Acceptable business courtesies may include the following, if permitted by local policy:

- Meals of modest value at a place appropriate for a business discussion
- Branded items of minimal value, such as mugs or pens
- Local souvenirs of minimal value

## Examples of I<sup>2</sup>CARE in Action



### DO:

- ✓ Accept business courtesies only if they meet policy requirements and limits
- ✓ Disclose any business courtesies as required by local policy



### DON'T:

- ✗ Accept cash, gift cards or other cash equivalents
- ✗ Accept business courtesies that exceed policy limits
- ✗ Accept a business courtesy that may impair your loyalty to McKesson or creates the appearance of a conflict
- ✗ Request business courtesies from business partners, for yourself or others
- ✗ Use a third party to coordinate business courtesies



Care to Learn More



## Preventing Insider Trading Violations

We never engage in unauthorized or illegal insider trading of any securities. We do not use or disclose material non-public information about McKesson or other companies, whether or not we personally benefit.

### Why We Care

McKesson values that our debt and equity securities can be offered and traded in a fair and open market. Using material non-public information for personal benefit or sharing it with others may violate the law. Insider trading misrepresents markets and hurts our reputation. If you engage in insider trading, you will be subject to disciplinary action and may face criminal or civil action.



### What is Insider Trading?

The term "**Insider Trading**" refers to the unauthorized or illegal purchase or sale of stock or other securities based on, or while aware of, material non-public information.

**Material information** refers to information a reasonable investor likely would consider important when making an investment decision, such as buying or selling stock.

**Non-public information** or **inside information** means information has not been disclosed: (i) by the relevant company, (ii) using a method designed to broadly communicate the information, and (iii) with sufficient time for the market to become aware of the disclosure.

#### Examples of potential material non-public information include:

- Earnings results, estimates, or changes in estimates.
- Key financial performance results or estimates for McKesson or a reporting segment
- Significant mergers and acquisitions activity
- Significant cybersecurity incidents
- Developments in significant litigation matters
- Changes in Board or executive leadership
- Significant expansion or curtailment of operations
- Changes in the dividend program or to the share repurchase plans
- Extraordinary borrowing or liquidity problems

**Tipping** means sharing material non-public information about a security, or recommending a securities transaction based on material non-public information, which results in insider trading. You can violate our policies and the law by tipping even if you do not yourself trade in the related securities.

Disclosing or using material non-public information in connection with a securities transaction violates McKesson policies and may violate the law. Unauthorized use or disclosure of confidential information learned in your employment violates McKesson policies even if no securities transaction occurs.

## Examples of I<sup>2</sup>CARE in Action



### DO:

- ✓ Follow all securities laws and McKesson's insider trading policies and guidance
- ✓ Only share confidential information with authorized people that "need to know"



### DON'T:

- ✗ Trade in any security while you are aware of material non-public information about that security
- ✗ Recommend to anyone that they trade in any security based on confidential information



Care to Learn More



## Protecting Our Assets

McKesson's assets are valuable and must be protected. We each have a duty to use assets properly and to protect them from misuse.

### Why We Care

Aligned with our I<sup>2</sup>CARE values, we are responsible stewards of McKesson's assets. When we effectively manage our assets, we protect shareholders' interests and our investments, and ensure we comply with the law.

### Examples of Assets



#### Physical assets

- Land
- Buildings
- Equipment
- Furnishings
- Supplies



#### Electronic assets

- McKesson network and other technical environments
- Personal data stored on McKesson's systems and servers
- Computer software and applications
- Computers and smart devices



#### Financial assets

- Cash or cash equivalents
- Equity investments



#### Intangible assets

- Our brand
- Our reputation
- Confidential information
- Intellectual property including patents, trademarks, copyrights and trade secrets
- Information related to McKesson's business, such as customer lists, business strategy or market research



## Examples of I<sup>2</sup>CARE in Action



### DO:

- ✓ Protect all McKesson property and report loss, damage or misuse to a People Leader
- ✓ Follow McKesson's policies for using assets properly
- ✓ Treat McKesson's assets as you would your own
- ✓ Only use McKesson's assets for company business
- ✓ Protect our reputation and brand



### DON'T:

- ✗ Allow unauthorized use of McKesson's assets



## Protecting Intellectual Property

Intellectual property (IP) refers to non-physical assets developed through creative work done by our employees and partners. IP is safeguarded by legal protections including patents, trademarks, copyrights and trade secrets. We are fully committed to protecting McKesson's IP rights. We also respect others and avoid infringing on other parties' IP rights.

## Examples of I<sup>2</sup>CARE in Action



### DO:

- ✓ Raise any questions or concerns about IP to the Law Department
- ✓ Obtain legal guidance before using IP owned or created by others



### DON'T:

- ✗ Infringe on the IP rights of others
- ✗ Duplicate source code or download or use other parties' software without guidance from the Law Department



Care to Learn More



## Securing McKesson's Systems, Information and Business Operations

Each of us must safeguard information that we create or receive on the job. We protect McKesson's networks, systems and the data contained on these systems. We must guard against cybersecurity risks and other threats to our data and technical operations.



### Confidential Information

While performing our jobs, we may have access to confidential information about McKesson, business partners and customers.

Examples of confidential information include:

- McKesson's playbook and strategic plans
- Pricing information
- Financial data
- Technical data
- Equipment layout and design
- Product costs
- Technical processes
- Sales and marketing strategies
- Product features and functions
- Product strategy
- Customer lists
- Information about McKesson personnel

Confidential data should be shared only with colleagues who have a need to know, are informed of their confidential nature and are authorized to see them. If confidential information must be shared with a current or potential business partner, a company-approved Non-Disclosure Agreement may be required. Contact the Law Department to determine requirements.



### Examples of I<sup>2</sup>CARE in Action



#### DO:

- ✓ Follow McKesson data classification policies and guidelines
- ✓ Share McKesson information only with people authorized to access it
- ✓ Ensure that documents, data and devices are secured
- ✓ Stay alert and report phishing incidents or other attempts to acquire McKesson's data improperly



#### DON'T:

- ✗ Use non-McKesson or other unapproved devices to store, process or back up McKesson's data
- ✗ Use personal email or use/download unapproved software systems or apps to conduct McKesson business
- ✗ Provide McKesson's information to a third party without prior authorization
- ✗ Discuss confidential matters in a public place
- ✗ Share or reuse credentials, such as user IDs or passwords



## Using Company Technology

We have a duty to use McKesson's network, computer and communications systems appropriately and legally. Where allowed by local law and company policy, McKesson has the right to monitor access and use of all company systems. You should not assume that any of the information stored on McKesson's systems or devices are private, and you should conduct yourself accordingly.

### Examples of I<sup>2</sup>CARE in Action



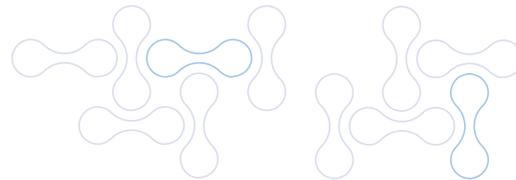
#### **DO:**

- ✓ Use McKesson technology for authorized business purposes



#### **DON'T:**

- ✗ Use your McKesson computer or other devices for inappropriate personal uses



## Safeguarding Private and Personal Information

We fulfill our I<sup>2</sup>CARE values by respecting Personal Information (PI), which includes health information shared with us. We use and share PI in compliance with McKesson's policies and the privacy laws that apply to us.

### Why We Care

We are committed to safeguarding PI. Many laws establish standards for using and disclosing private information. These include the Health Insurance Portability and Accountability Act (HIPAA) in the U.S., the General Data Protection Regulation in Europe (GDPR), state laws such as the California Consumer Privacy Act (CCPA) and other global and local laws. We only disclose PI to authorized parties with a need to know. We ensure third parties have safeguards before making any disclosures.

We hold employees and partners accountable for following our I<sup>2</sup>CARE values when using PI. You should know the privacy laws that apply to your work. Privacy is everyone's responsibility, and it begins with you.



### What Is Personal Information?

**Personal Information** is anything that could identify, or be combined to identify, an individual, including consumers, patients, employees, households, etc.

Examples include:

- Name
- Address
- Email address
- Social Security Number
- Credit card number
- Personal characteristics like race, religion and age
- Device identifiers (e.g., mobile IDs)
- Online cookie identifiers
- IP addresses
- Employee ID numbers that can be traced to a specific employee
- An alias that can be traced to a specific person
- Mental or physical health condition, treatment or diagnosis
- Medical identification numbers



### Potential Data Privacy Incidents

All suspected privacy incidents must be reported and investigated. This includes, but is not limited to the following situations:

- PI may have been disclosed to improper recipients
- Data containing PI is sent to the wrong recipient
- Loss or theft of a device that may contain PI
- PI is accessed by an unauthorized person

Suspected incidents can be reported in a number of ways, including, but not limited to, [the Information Security and Risk Management team](#), the Global Privacy Officer or a [Speak Up Channel](#).



## Examples of I<sup>2</sup>CARE in Action



### DO:

- ✓ Know whether your job requires you to handle PI
- ✓ Protect all PI obtained through your job
- ✓ Follow all laws and policies for using PI
- ✓ Share PI only with authorized parties with a need to know
- ✓ Use and access PI only for legitimate business purposes
- ✓ Report any potential loss or exposure of PI to the appropriate channels



### DON'T:

- ✗ Share PI with anyone that does not need to know
- ✗ Share or transmit PI without proper controls in place, including encryption where applicable
- ✗ Leave equipment unlocked or unattended
- ✗ Store or send PI to personal devices
- ✗ Discard PI in unsecured trash bins



## Maintaining Accurate Records and Financial Reports

We keep complete, accurate and current records. We are committed to providing accurate reports to investors and agencies about McKesson's financial condition and results of operations.

### Why We Care

We rely on the integrity of our records to make good business decisions. We are legally required to keep accurate books and records. The accuracy of our books and records contribute to the quality of reports we file with agencies and make available to the public. Accurate records and financial reports help maintain the confidence of shareholders, customers, business partners and lawmakers.

### Examples of I<sup>2</sup>CARE in Action



#### DO:

- ✓ Comply with accounting policies and internal controls
- ✓ Maintain records that accurately reflect transactions
- ✓ Record transactions timely and accurately
- ✓ Follow delegation of authority policies
- ✓ Follow our processes and procedures for contracts and obtain approval from the Law Department and Finance as required
- ✓ Follow all record retention policies and procedures
- ✓ Preserve documents and records with legal holds



#### DON'T:

- ✗ Create false or misleading records
- ✗ Use cash funds or other assets or liabilities that are secret or unrecorded
- ✗ Commit to any contract, payment or other obligation unless authorized to do so
- ✗ Make business agreements outside of our contracting process
- ✗ Enter agreements that do not accurately reflect the transaction or relationship
- ✗ Use side letters or off-the-books arrangements
- ✗ Destroy records that are subject to legal hold or required to be saved under retention policies



### What are records?

**Records** are any materials we keep that document McKesson's decisions, actions or transactions. Records can take paper or electronic forms. We keep records for a variety of business and legal purposes.

Some examples of records include:

- Government filings
- Financial reports
- Invoices
- Claims
- Expense reports
- Contracts



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## Safeguarding Our Reputation

We protect McKesson's reputation and uphold our I<sup>2</sup>CARE values by communicating responsibly. We expect employees and business partners to be professional, accurate and truthful in all communications. Only authorized people are allowed to represent McKesson in public communications.

### Why We Care

Using a consistent voice when speaking about matters related to McKesson helps us protect our reputation and instills public trust.



### Communication Requests

If you receive an external request for information, forward it to the correct department.

- Send questions from the media or public to the Communications Department
- Send questions and requests from Government Officials to the Law Department
- Send requests from the financial community or shareholders to Investor Relations



### Social Media

We respect your right to use social media. While using social media, be sure to follow applicable policies. Unless authorized to do so by McKesson, do not state or imply that you are speaking for or on behalf of the company.

## Examples of I<sup>2</sup>CARE in Action



### DO:

- ✓ Communicate responsibly following our I<sup>2</sup>CARE values and policies
- ✓ Refer all questions to the appropriate department
- ✓ Be aware that your comments on social media could affect McKesson's reputation



### DON'T:

- ✗ Present your personal views as those of McKesson
- ✗ Disclose material non-public information or confidential information
- ✗ Represent or imply that you speak for McKesson unless you are authorized to do so



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# Our Communities

## Protecting Our Environment

We are committed to environmental responsibility. We believe that protecting our planet and operating sustainably improves the health of patients and our communities. We comply with applicable environmental, health and safety laws and regulations.

### Why We Care

Climate change has a direct and significant impact on human health. It is one of the biggest challenges society faces today. We can positively impact our climate and human health by protecting our environment and minimizing our environmental footprint.

### Examples of I<sup>2</sup>CARE in Action



#### DO:

- ✓ Follow all applicable environmental laws and McKesson policies and procedures
- ✓ Safely handle and dispose of hazardous materials
- ✓ Contact the Environmental Health and Safety team to report environmental incidents, such as spills or leaks



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## Respecting Human Rights

We are committed to upholding human rights everywhere we do business. We comply with applicable laws prohibiting forced, compulsory and child labor and human trafficking.

### Why We Care

We uphold our I<sup>2</sup>CARE values by treating all people with dignity and respect, and by upholding human rights in our business and our supply chain. We seek to work with business partners that share our commitment to human rights.

### Examples of I<sup>2</sup>CARE in Action



#### DO:

- ✓ Watch for and escalate red flags of potential human rights violations
- ✓ Follow all policies for supplier onboarding and due diligence



#### DON'T:

- ✗ Engage in or promote the trafficking of persons, forced or child labor
- ✗ Contract with suppliers without following onboarding, due diligence and other policies



### Be aware of red flags of potential human rights violations, including:

- Mental or physical coercion
- Forced labor indicators such as intimidation, withholding wages and abusive working or living conditions
- Workers who appear to be under the local legal minimum age
- Work hours that are longer than regular or overtime hours allowed by local law



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## Responsible Sourcing

I We seek to do business with suppliers who share our I<sup>2</sup>CARE values.

We expect our suppliers to:

- Conduct business ethically and with integrity
- Comply with applicable laws and regulations
- Protect the human rights of their employees and treat them with dignity and respect
- Provide for the health and safety of their employees, customers and others
- Provide quality goods and services that are safe and effective

### Why We Care

Practicing responsible sourcing strengthens our supply chain and supports sustainable business growth. We are committed to meeting our business objectives while making a positive impact on people in our supply chains and our environment.

### Examples of I<sup>2</sup>CARE in Action



#### DO:

- ✓ Consider social, ethical and environmental factors when evaluating and selecting potential suppliers
- ✓ Follow all supplier onboarding and due diligence policies
- ✓ Audit suppliers against the requirements of our Responsible Sourcing Program
- ✓ Escalate concerns that a supplier may be violating our policies or the law



### What is responsible sourcing?

The term "**Responsible Sourcing**" refers to our commitment to consider social, ethical and environmental factors in our relationship with suppliers



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## Investing in Our Communities

We are committed to advancing health outcomes for all and driving positive impact in the communities where we live and work. Community engagement helps us develop an engaged and healthy workforce and creates better health outcomes for all.

### Why We Care

We fulfill our I<sup>2</sup>CARE values by being good corporate citizens and giving back to our communities. Our commitment to being an impact-driven organization helps us create sustained value for both society and McKesson.



### What are some examples of the ways McKesson gives back?

Our programs are built to reflect our focus on better health.

Examples include:

- The McKesson foundation partners with charities that align with the Foundation's strategic pillars: Advancing Cancer Care and Research, Diversifying the Healthcare Talent Pipeline, and Emergency Preparedness and Disaster Relief.
- Our business units support the community through donations to charitable organizations.
- Employees share professional skills through pro bono services, serving on non-profit boards, making monetary donations and volunteering their time with local and national charitable organizations.

### Examples of I<sup>2</sup>CARE in Action



#### DO:

- ✓ Follow McKesson's policies for company-sponsored charitable giving
- ✓ Volunteer in your local communities
- ✓ Contribute to causes that support health and our I<sup>2</sup>CARE values
- ✓ Deepen your impact in the community by participating in the McKesson Foundation's matching gifts, volunteer and board service programs



#### DON'T:

- ✗ Contribute to unauthorized charities using McKesson's name
- ✗ Participate in community service activities that may create an actual or potential conflict of interest without following [Conflict of Interest](#) disclosure processes



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# Conclusion



# Compliance and Ethics at McKesson

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

For us, compliance is more than just following rules. It includes considering the broader implications of the actions we take, and adapting to new challenges and situations, always guided by our I<sup>2</sup>CARE values.

Our Compliance and Ethics team is here to help you. Please contact us if you have questions about the topics covered in our Code.



## Remember: Speak Up

McKesson Hotlines are operated by independent third parties, and are available 24 hours a day, seven days a week with operators available in multiple languages.

Anyone within or outside the company can use the Hotlines to raise an anonymous concern.



## McKesson Hotlines

McKesson does not tolerate any form of retaliation and will always make every reasonable effort to protect your confidentiality



### McKesson's Integrity Line for U.S., Canada and Rest of World (excluding Europe).

You can access the Integrity Line by phone or web:



**Phone:** 1.877.625.4625



**Online:** <http://integrity.mckesson.com>

\*Local toll-free numbers for locations outside the U.S. are listed at [integrity.mckesson.com](http://integrity.mckesson.com)



### Compliance Helpline for Europe

You can access the Ombudsman by phone, web or email:



**Phone:** 00800 – OMBUDSMAN or 00800 – 66283762  
(toll-free from any McKesson Europe country)



**Fax:** +49(0)521.557333-44



**Email:** [ombudsman@thielvonherff.com](mailto:ombudsman@thielvonherff.com)