



**Bausch Health Companies Inc.
Policy on Political Contributions and
Political Activities**

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**Approved by: Chief Ethics Compliance Officer on
Behalf of the Compliance Management Committee**

Policy on Political Contributions and Political Activities

1. Purpose and Scope

Bausch Health is subject to various laws and regulations that govern interactions with Government Officials. This Policy outlines the rules that apply to employees, officers, and members of the Bausch Health Board of Directors who participate in these interactions. All such personnel are responsible for adhering to all applicable laws, as well as for maintaining Bausch Health's reputation, at all times.

2. Definitions

Government Official: Includes, but is not limited to: (1) officers, employees and agents of governments or government entities, (2) elected officials or candidates for political office, (3) directors, officers and employees of non-governmental international organizations (e.g., the World Health Organization, Doctors Without Borders, Red Cross, etc.), (4) any member of a royal or ruling family, and (5) any person with the responsibility to allocate or influence expenditures of government funds, including persons serving in unpaid, honorary or advisory positions.

Medically Relevant Gifts: Items of modest value, relevant to the practice of medicine or pharmacy primarily intended for the education of patients and healthcare professionals ("HCPs") or directly beneficial to the care of patients; or as defined by local law or industry codes. These items have no value outside the recipient's professional responsibilities and do not offset routine business practices of HCPs.

Payment: Any and all compensation or remuneration, including, but not limited to, payments and reimbursements for personal or professional services, meals, travel, grants, sponsorships, research grants, clinical studies, professional meetings, product training, medical education, research funding, product development services, in-kind services, expenses, and royalties or other payments for transfer of documented intellectual property.

3. Policy

a. General Considerations

- All employees who interact with Government Officials must be familiar with the applicable lobbying laws and public disclosure requirements, particularly those that apply to registrations and filings.
- Lobbying laws generally apply to any efforts to influence government action through oral or written communication. In addition to covering communications regarding legislation, regulation, or policy, lobbying laws also may cover attempts to secure business from a government body, such as a public hospital.

- Bausch Health employees must always conduct themselves honestly, transparently, and in a manner consistent with the Company's Code of Conduct. It is a violation of Bausch Health policy for any Company personnel to misrepresent themselves or their purposes to Government Officials or other third-parties, or to try to obtain information or to procure any action or decision through dishonest means. In the event Bausch Health hires individuals who formerly served as Government Officials, it shall respect all relevant confidentiality obligations.
- No employee shall make, offer, or promise to make, or authorize the making of any form of Payment, whether direct or indirect, to any Government Official, as an inducement to procuring or keeping business, or having a law or regulation enacted, defeated, or violated.
- No employee shall seek to induce Public Officials to contravene any rules of behavior that are applicable to them.

b. Gifts to Government Officials

- Gifts and other transfers of value (e.g., travel reimbursement) to Government Officials are not permitted without **advance written approval of the General Counsel.**

c. Business Meetings with Government Officials

- Certain Bausch Health personnel are authorized to meet with Government Officials as part of their functional responsibilities ("Authorized Personnel"). Examples of Authorized Personnel include: (1) Regulatory Affairs and R&D personnel engaging in conversations with health authorities regarding marketing authorizations for Company products; (2) personnel with pricing, market access and public tendering responsibilities meeting with government procurement personnel, and (3) personnel in tax, legal and similar roles meeting with Government Officials charged with overseeing the Company's compliance with applicable laws and regulations.
- Bausch Health Personnel who are not Authorized Personnel must receive prior approval before engaging in lobbying interactions with Government Officials. In the United States, **prior approval may be provided by either the Vice President, Government Relations or the General Counsel.** Outside of the United States, **prior approval may only be provided by the General Counsel.**
- Information provided to Government Officials must be up-to-date, complete, and not misleading.
- Meals may be provided in connection with such business meetings only under the following conditions:

- When the meal is approved in advance and in writing by the Chief Compliance Officer;
 - When the meal is not solicited by the Government Official;
 - When such meals occur infrequently;
 - When the meal is permissible under all rules applicable to the Government Official (e.g., the Standards of Ethical Conduct for Employees of the Executive Branch);
 - When it arises out of the ordinary course of business and is directly related to either:(i) the promotion, demonstration, or explanation of Bausch Health products or services, or (ii) the execution or performance of a contract with the official's government agency;
 - When it involves reasonable and not lavish expenditures, such as those customarily incurred for regular, ongoing business purposes;
 - When the expenses are paid directly by Bausch Health and are not reimbursed to the Government Official; and
 - When the setting and type of meal is reasonable, appropriate, and fitting to our employees, their guests, and the business at hand.
- Failure to obtain prior written approval when required by this policy may result in disciplinary action, including termination.

d. Healthcare Providers who Qualify as Government Officials

- In certain circumstances, Company employees may interact with healthcare professionals who also happen to be Government Officials, including when promoting Company products to professionals who work at government hospitals and clinics. In these scenarios, employees may provide modest meals and medically relevant gifts, such as reprints or anatomical models, when doing so is permitted by: (1) the relevant Company policy governing interactions with HCPs in the relevant country, and (2) any applicable local laws or institutional policies.

e. Political Activities and Disclosure Compliance in the United States

- US federal law and certain US states prohibit a corporation, such as Bausch Health, from making political contributions. This includes monetary contributions (e.g., in the form of a corporate check or a purchase of tickets to a political fundraiser) as well as “in-kind” contributions (e.g., the use of corporate personnel or facilities, or payment for services).

- Bausch Health will not make corporate contributions that are prohibited under applicable law. To ensure that Bausch Health is in compliance with these laws and to ensure compliance with the Lobbying Disclosure Act, all employees of Bausch Health must comply with the following requirements when engaging in political activity in the United States:
 - Any proposed political contribution or expense incurred by Bausch Health on behalf of any candidate, officeholder, campaign, political party, political committee (e.g., a PAC or ballot measure committee), or any entity exempt from federal income taxes under Section 527 of the Internal Revenue Code must be approved in advance and in writing by the Legal Department in consultation with the Vice President, Government Relations.
 - Pre-approval by the Legal Department and Vice President, Government Relations is required for any of the following payments:
 - payments for an event to honor or recognize a covered federal Legislative or Executive Branch official;
 - payments to an entity or person that is named for a covered federal Legislative Branch official, or to an entity or person in recognition of such official;
 - payments to an entity established, financed, maintained, or controlled by a covered federal Legislative or federal Executive Branch official or to an entity designated by such official;
 - payments for a meeting, retreat, conference, or other similar event held by or in the name of one or more covered federal Legislative or federal Executive Branch officials;
 - contributions to a U.S. Presidential library foundation or inaugural committee payments.
- No corporate assets, funds, facilities, or personnel may be used to benefit any candidate, campaign, political party, or political committee (e.g., a PAC or ballot measure committee), or any entity exempt from federal income taxes under Section 527 of the Internal Revenue Code without advance approval in writing by the Legal Department.
- Bausch Health strictly complies with applicable registration and reporting requirements, including those in the Lobbying Disclosure Act and Honest Leadership and Open Government Act. Bausch Health publicly discloses all covered political donations and lobbying expenditures, and it requires its outside lobbying firms to do the same.

f. Personal Political Activities

- Employees have the right, and are encouraged, to voluntarily participate in the political process and make personal contributions, as long as the following requirements are met:
 - If you anticipate causing any corporate funds or assets (such as corporate facilities or personnel) to be used in connection with your volunteer activity, you must obtain written pre-approval, as described above.
 - You may not work on a political fundraiser or other campaign activity during working hours unless you obtain written pre-approval, as described above.
 - If you choose to participate in the political process, you must do so as an individual, not as a representative of Bausch Health. Indeed, any overt, visible, and partisan political activity that could cause someone to believe that your actions reflect the views or position of Bausch Health requires the prior written approval of the Legal Department.
- No one at Bausch Health may make a political contribution to obtain or retain business or to obtain any other improper advantage.
- Bausch Health shall not directly or indirectly reimburse or otherwise compensate any person for his or her personal political contributions.
- No one at Bausch Health may actually or threaten force or reprisal against an employee to contribute to, support, or oppose any political group or candidate.
- As of the date of this policy, Bausch Health does not maintain a political action committee (“PAC”).

g. “Pay to Play” Limits: Written Pre-Approval of Certain Personal Political Contributions by Certain Employees and Board Members

- Certain state and local jurisdictions in the U.S. have enacted so-called “pay-to-play” laws that prohibit entities such as Bausch Health from being eligible for government contracts if certain covered employees or members of the Board, and in some cases their spouse or dependent child, make or solicit political contributions to state or local candidates, political party committees, or other political committees in that jurisdiction.
- To comply with these laws, members of the Board and employees who are director-level or above, in either case only if they reside in the U.S., are required to obtain written pre-approval from the Chief Compliance Officer

before making or soliciting a political contribution to a U.S. state or local candidate, political party, or other political committee in the jurisdictions listed on the Bausch Health guidance document called “Understanding State and local Restrictions on Political Contributions by Government Contractors and Key Personnel”. Where indicated, they must also obtain written pre-approval for political contributions made or solicited by their spouse or dependent child.

4. Reporting Violations

All reports of suspected or actual violations of this policy should be directed to our Compliance & Ethics or Legal Departments. Reports may also be made anonymously through our Business Ethics Hotline at 1-888-451-4510 (U.S. and Canada), or online at hotline.bauschhealth.com.

5. Review of Policy

The Chief Ethics & Compliance Officer or his or her designee will periodically review this policy and update it as necessary.

Failure to comply with this policy may result in disciplinary procedures up to, and including, termination.

6. Related Policies and SOPs

Please see the following Bausch Health Policies for more information:

- Bausch Health Code of Conduct
- Bausch Health Global Anti-Bribery Policy

7. Questions

Questions about this Policy should be directed to the Chief Compliance & Ethics Officer or General Counsel.