

Document Name: California Comprehensive Compliance Program

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At McKesson, we believe that integrity is the foundation of our culture and is critical to our long-term success. We work to inspire and enable McKesson employees to act with integrity in all we do. Compliance is an integral part of our company and leadership culture. It refers to our obligation to laws, regulations, and internal guidelines. For us, compliance is more than just following rules. It includes considering the actions we take, and adapting to new challenges and situations, always guided by our [ICARE](#) shared principles.

As part of our continued commitment to compliance, McKesson has a comprehensive Compliance Program that is based on the U.S. Department of Health and Human Services Office of Inspector General’s Compliance Program Guidance for Pharmaceutical Manufacturers (“OIG Guidance”), to the extent applicable to our businesses. Our Compliance Program consists of the following elements:

I. Compliance Leadership and Oversight

Our Chief Compliance Officer is aided by a Compliance and Ethics Group as well as a designated compliance officer for each of our businesses. The Chief Compliance Officer oversees and monitors implementation of our programs, including the standards and guidelines set out by regulators. Our compliance program includes:

- Written policies and procedures
- Compliance communications and web resources
- Regulatory and compliance training
- Internal auditing and compliance monitoring
- Toll-free whistleblower hotlines
- Investigations relating to compliance and ethics
- Corrective and/or preventive action, where necessary

Since FY19, our Board of Directors has had a standing Compliance Committee, whose purpose is to assist the Board in overseeing McKesson’s compliance programs and management’s identification and evaluation of our principal legal and regulatory compliance risks. The Compliance Committee of our Board of Directors meets regularly in private sessions with our Chief Compliance Officer, and has authority over the appointment, compensation, performance, and replacement, as necessary, of our Chief Compliance Officer.

II. Policies and Procedures

A shared document across our company, our [Code of Conduct](#) is based on our ICARE shared principles. It describes the fundamental principles and local policies and procedures that shape our work. It covers a wide range of topics that may occur when interacting with customers, industry partners and each other. It gives helpful guidance regarding where to turn with questions or concerns about the right thing to do.

In addition to our Code of Conduct, McKesson has implemented policies and procedures to address applicable provisions of U.S. federal and state laws and regulations and incorporate the OIG guidance, as applicable to our businesses.

McKesson has also established an annual spending limit on gifts, promotional materials, activities, or other items of value that may be provided to a medical or healthcare professional licensed or certified in the state of California.

III. Training and Education

McKesson has implemented a compliance training program which combines various training methods suitable for relevant employees. McKesson employees receive annual compliance training and education on the Code of Conduct and relevant compliance policies and procedures. Trainings are assessed periodically and updated to align with any changes in laws, regulations and/or policies.

IV. Lines of Communication

Every employee is responsible for ensuring we comply with the laws, regulations and ethical standards affecting our business.

Our employees raise concerns if they believe something inappropriate is happening at work. Managers have a duty to listen to employees' concerns and react to those concerns in an appropriate manner. By fostering an open environment, where all employees feel free to speak up without any fear of retaliation, we seek to advance our culture of compliance and integrity.

The McKesson whistleblower hotlines are available 24 hours a day, seven days a week, in multiple languages. It allows employees to raise concerns (anonymously if they wish), including possible violations of McKesson's Code of Conduct, its policies, or any illegal or unethical activity.

An independent third-party provider answers and documents all calls before forwarding them to McKesson. We investigate all allegations, and we provide reports of allegations and investigations to senior management and the Compliance Committee of the Board of Directors. The Audit Committee of the Board of Directors also receives reports on any allegations and investigations regarding accounting, internal accounting controls, or audit matters.

The hotlines are only one of the ways employees can raise concerns. We encourage employees to contact their manager, business unit compliance officer, or the Human Resources or Legal departments with any concerns. Employees may also report matters by email or through intranet portals. We strictly prohibit retaliation against an employee who makes a good faith report or complaint through any channel. After investigating, we develop and carry out a corrective and preventive plan, as needed.

V. Auditing and Monitoring

The design and overall effectiveness of the Compliance Program is subject to ongoing evaluation. In furtherance of our objective to prevent and detect instances of noncompliance, McKesson has also established an independent audit program to monitor and evaluate compliance with selected individual company policies and procedures and federal and state laws and regulations. As is suggested by the OIG Guidance, the nature, extent and frequency of our compliance monitoring and auditing is dependent upon a variety of factors, including regulatory requirements, changes in our business practices, and other considerations.

VI. Enforcing Standards through Well-Publicized Disciplinary Guidelines

McKesson's Code of Conduct provides notice to employees, officers, and directors that noncompliance with the Code, company policies and the law will have disciplinary consequences, up to and including termination of employment.

VII. Responding to Detected Problems and Taking Corrective Action

Regardless of whether raised through the McKesson whistleblower hotlines (Integrity lines), other lines of internal communication, monitoring and audits, or other channels, all allegations of non-compliance are promptly investigated. After investigating, we oversee the implementation of corrective measures in response to findings of non-compliance, such as disciplinary action, re-training, revision of policies and procedures, or other corrective actions as warranted.

We investigate all allegations of non-compliance. After investigating, we develop and carry out a corrective and

preventive plan, as needed.

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

As of April 20, 2021, to our knowledge, we are in material compliance with California Health & Safety Code §§ 119400-119402, to the extent applicable to our businesses. Our Compliance Program is subject to ongoing review and accordingly, may be updated from time to time.

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