

Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name <u>Viatrix Inc.</u>		2 Issuer's employer identification number (EIN) <u>83-4364296</u>	
3 Name of contact for additional information <u>Alan R. Weinerd</u>	4 Telephone No. of contact <u>917-262-2964</u>	5 Email address of contact <u>Alan.Weiner@viatrix.com</u>	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact <u>1000 Mylan Boulevard</u>		7 City, town, or post office, state, and ZIP code of contact <u>Canonsburg, Pennsylvania , 15317</u>	
8 Date of action <u>November 16, 2020</u>		9 Classification and description <u>Stock</u>	
10 CUSIP number <u>92556V 106; N59465 109</u>	11 Serial number(s)	12 Ticker symbol <u>VTRS</u>	13 Account number(s)

Part II Organizational Action Attach additional statements if needed. See back of form for additional questions.

14 Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action ▶ On November 16, 2020 Mylan N.V. ("Mylan") effected a strategic business combination transaction with Viatrix Inc. ("Viatrix"), pursuant to which holders of Mylan ordinary shares received, in exchange for their Mylan ordinary shares, shares of Viatrix common stock in a taxable transaction (the "Combination").

15 Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis ▶ The receipt of Viatrix common stock in exchange for Mylan ordinary shares pursuant to the Combination was a taxable transaction for U.S. federal income tax purposes. Therefore, generally a Mylan shareholder recognized capital gain or loss equal to the difference between (i) the shareholder's adjusted tax basis in the ordinary shares of Mylan stock exchanged and (ii) the fair market value of the shares of Viatrix common stock received in the transaction. A shareholder's adjusted tax basis in Mylan ordinary shares generally should have equaled the shareholder's purchase price for the shares, as adjusted to take into account stock dividends, stock splits, or similar transactions.

A Mylan shareholder receiving Viatrix common stock pursuant to the transaction will have an initial tax basis in those Viatrix common stock shares equal to the fair market value of the Mylan ordinary shares exchanged therefor.

16 Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates ▶ Viatrix intends to take the position in all applicable tax filings that the fair market value of each share of Viatrix common stock and each Mylan ordinary share, each at the time of the Combination, was equal to \$15.66, which was the per share closing price Viatrix as displayed under the heading "Last Price" on the Bloomberg page for "VTRSV" for the date of the Combination (November 16, 2020). Viatrix notes that there are various ways to determine the fair market value of the Viatrix common stock and Mylan ordinary shares, including the closing price of Mylan ordinary shares for the date of the Combination, the per share volume-weighted average price of Mylan ordinary shares for the date of the Combination, and the per share volume-weighted average price of as-issued Viatrix common shares on the date of the transaction. Viatrix believes that each of these methods may be appropriate for determining the fair market value of Viatrix for U.S. federal income tax purposes. Viatrix recommends that each holder of Viatrix common stock or Mylan ordinary shares consult his or her own tax advisor as to the fair market value of the shares exchanged in the Combination.

Part II **Organizational Action** (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ Internal Revenue Code Sections 1001 and 1012.

18 Can any resulting loss be recognized? ▶ Yes.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ The reportable year for this taxable transaction is the calendar year of 2020 or the fiscal year inclusive of November 16, 2020.

THE U.S. FEDERAL INCOME TAX CONSEQUENCES DISCUSSED IN THIS FORM 8937 ARE FOR GENERAL INFORMATION ONLY AND DO NOT CONSTITUTE TAX ADVICE TO ANY HOLDER OF NEWCO COMMON STOCK OR MYLAN ORDINARY SHARES, EACH HOLDER OF NEWCO COMMON STOCK OR MYLAN ORDINARY SHARES SHOULD CONSULT HIS OR HER OWN TAX ADVISOR AS TO THE PARTICULAR CONSEQUENCES THAT MAY APPLY TO THE HOLDER FOR A MORE DETAILED DESCRIPTION ABOUT THE TAX CONSEQUENCES OF THE TRANSACTION PLEASE SEE "MATERIAL TAX CONSEQUENCES" IN THE S-4 FILED WITH THE SEC ON OCTOBER 25, 2019 BY UPJOHN INC.

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign Here
Signature ▶  Date ▶ December 22, 2020

Paid Preparer Use Only	Print your name ▶ <u>Alan Weiner</u>	Preparer's signature	Title ▶ <u>Head of Global Tax</u>	Check <input type="checkbox"/> if self-employed	PTIN
	Print/Type preparer's name		Date	Firm's EIN ▶	
	Firm's name ▶			Phone no.	
	Firm's address ▶				