U NOVARTIS

SpeakUp

Handling complaints

At Novartis, everyone is required to report Code of Ethics violations. The SpeakUp Office (formerly named Business Practices Office) offers employees and people outside of Novartis a channel through which to report misconduct.

The SpeakUp Office helps Novartis act with the highest ethical standards in the following ways:

- Empowering associates to speak up without fear
- Treating those that trust us with their concerns with respect, fairness, confidentiality and protection against retaliation
- Establishing the facts and trying to understand the truth with a sense of urgency
- Ensuring fair and consistent remedial actions
- Providing feedback to those courageous enough to raise concerns

Complaints can be made by email, phone, online or in-person. The web-based and telephone channels are operated via a third-party vendor. The SpeakUp Office manages investigations into all complaints, and escalates any substantiated cases of misconduct to management for appropriate action.

We report on complaints received and substantiated in our Novartis in Society ESG Report.

Contact the SpeakUp Office

Any complaints concerning conduct of Novartis employees can be made directly to the SpeakUp Office through a web-based platform (webform or phone)*.

Novartis associates can either directly report the alleged misconduct to the SpeakUp Office, or through any of the contact options listed below.

- Any manager
- Any member of the People & Organization Function
- The Country President
- Any member of the Legal Function
- Any member of the Ethics, Risk & Compliance Function
- Any member of Global Security

Reports of alleged misconduct can be made anonymously, however, anonymity may limit the ability to fully and thoroughly investigate a claim. If you have questions about how and when to report, please contact <u>speakup@novartis.com</u>.

For Novartis associates using mobile devices, a SpeakUp app is available on the Novartis app store allowing easy web-based reporting.



References:

* <u>Webform or phone</u> or via local channels (your manager, ERC, P&O, Legal, Global Security functions, Country President)

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