

# Code of Ethics

## Our commitment to doing what's right

Novartis is committed to ensuring our associates are empowered to do what's right. On September 01, 2020, we introduced a new Code of Ethics for Novartis. Created by our associates, for our associates, our new Code is a collection of our commitments to ethical standards across our business.

Our Code of Ethics was co-created with the inputs of thousands of associates. It is anchored in behavioral science, and underpinned by four clear ethical principles:

- Be Open-Minded
- Be Honest
- Be Bold
- Be Accountable

The Code of Ethics replaces our former Code of Conduct and is a fundamental part of the terms of employment for all associates of Novartis Group companies. All associates receive the Code when they join the Novartis Group and are held accountable to its contents. It is available in 22 languages and has been adopted by local boards.

The Code contains our principles and expectations for ethical business conduct that help guide our associates in making the right decisions when they encounter difficult situations or ethical challenges during the course of their work.

## Our Ethical Principles

The Code of Ethics focuses on our commitment to meet the expectations of our five key stakeholder groups: our patients, associates, shareholders, healthcare partners and society. While our purpose - to reimagine medicine to improve and extend lives - drives our values and defines our culture of inspired, curious and unbossed, our ethical principles guide us in our everyday decision-making and ensure we act with integrity.

## Ethical Decision Making Framework

Because ethics isn't black and white, we've created an online, interactive ethical decision making framework to guide our associates towards better decision making. The framework guides users through 15 questions, prompting deep reflection as part of the decision-making process, surfacing up to 6 possible biases and suggesting materials and resources for further learning. The framework does not replace conversation and consultation, and does not give a definitive answer about what one should do, but it helps broaden perspectives and encourages better understanding and application of our ethical principles.

Novartis expects leaders to lead by example. This means that leaders must accommodate ethical considerations in business planning and decision-making, empowering associates to make responsible decisions, and creating a safe environment to speak up when ethical challenges arise.

In addition, we encourage and reward ethical behavior by including an assessment of each associate's

alignment to our values and behaviors in their annual performance appraisal. Achieving business objectives and alignment with company values receive equal weighting in compensation reviews.

## Training and guiding associates

Awareness and training programs are offered regularly in a range of formats, including awareness-building programs, e-training, face-to-face programs, games and workshops. We provide extensive communication toolkits to support awareness programs at the local level.

All Novartis Group company associates are required to complete ethics, risk and compliance training. Our global e-training curriculum provides relevant information to enable associates to make the right choices in the course of their work and to perform with integrity. It addresses identified and relevant company risks and helps to communicate new and upgraded policies and guidelines across the organization.

In addition, all newly hired associates and contractors worldwide complete a mandatory onboarding e-Training course. This comprehensive course covers 17 subject areas and is sent to all new hires four weeks after their employment begins.

We report relevant completion rates for our e-trainings in our Novartis in Society ESG Report. Training on ethical business practices is included in our Corporate Leadership Learning programs, and we provide extensive training for our Ethics, Risk and Compliance Officers across the company.

## Handling complaints

We require associates to report actual or suspected violations of our Code of Ethics, but realize that fear of reprisals can make people hesitant to speak up. This is why we enforce clear policies to prevent retaliation against any associate reporting an issue.

The SpeakUp Office (formerly named Business Practices Office) offers employees and people outside of Novartis a channel through which to report misconduct. 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

#### Related links:

- [Other policies and guidelines](#)

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