

# Code of



## **Our commitment to doing what's right**



**Our Code of**

# ETHICS

# Novartis has a purpose that is profoundly important for the world – to reimagine medicine to improve and extend people’s lives.

We discover and develop breakthrough treatments and find new ways to deliver them to as many people as possible. Collectively, our work touches the lives of nearly one billion people every year, and we have a tremendous impact on humanity.

We aren’t just working to improve the world of medicine—we are reimagining it. Our company endeavors to quite literally push the boundaries of human understanding, pioneer new ways of treating disease, embrace data science and technology, provide access in ways no medicines company has ever done before, and much, much more. And we do it all against the backdrop of an ever-changing, complex, and interconnected world.

A purpose like ours, matched with those bold ambitions, requires us to do things differently. The world rightfully has the highest expectations of our company, and only through a deep and actionable commitment to ethics can we strengthen and maintain trust with society.

That is why we are proud to share with you our new Code of Ethics. Co-created with associates to reflect the very different

contexts we operate in around the globe, our new Code will serve as a guide for decision-making to help all of us navigate situations that are complex or unclear. It is designed to drive meaningful conversations around ethics, and most importantly, to help us all do what is right.

We encourage you to spend time with our new Code of Ethics, to speak about it with your colleagues, and most importantly, to come back to it when you’re looking for the right path forward in anything you’re doing, whether it seems big or small.

When it comes down to it, Novartis is not our buildings and structures and processes—it is our people. It’s all of us. If we all bring our Code of Ethics to life and use it to guide our individual work, we’ll build lasting trust with society—and our efforts to reimagine medicine will transform the health of the world.

## **Vas Narasimhan**

Chief Executive Officer on behalf of the Executive Committee

## **Joerg Reinhardt**

Chairman of the Board

# Doing what's right

Sometimes doing what's right is easier said than done. There are times when we all could use a little help to feel confident that we are making good choices.

Our Code of Ethics is here to do that.

It sets out who we are, what we stand for, and the principles we hold ourselves accountable to. Put simply, it explains our commitments to doing what's right, and helps us make good choices.

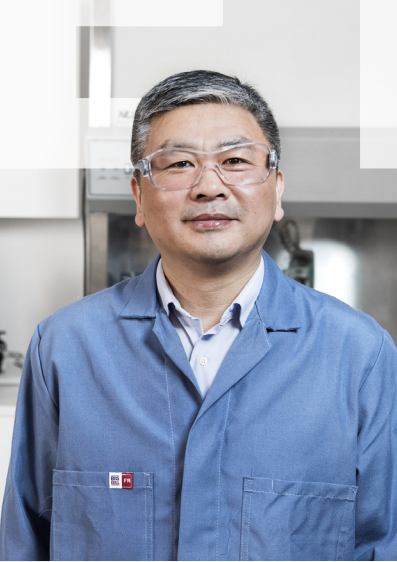
While our purpose - to reimagine medicine to improve and extend lives - drives our values and defines our culture of inspired, curious and unbossed, our ethical principles guide us in our everyday decision-making and ensure we act with integrity.

## Our ethical principles

<b>Be Open-minded</b>	<b>Be Honest</b>	<b>Be Bold</b>	<b>Be Accountable</b>
<p><b>Am I</b> actively listening to ideas or concerns?</p> <p><b>Am I</b> questioning the impact of my decisions?</p> <p><b>Am I</b> valuing the perspective of others?</p>	<p><b>Am I</b> acting with clear intent?</p> <p><b>Am I</b> avoiding harm?</p> <p><b>Am I</b> speaking up?</p>	<p><b>Am I</b> standing up for what I believe?</p> <p><b>Am I</b> putting patients first?</p> <p><b>Am I</b> making a positive difference?</p>	<p><b>Am I</b> taking responsibility for my decisions?</p> <p><b>Am I</b> treating others as I would like to be treated?</p> <p><b>Am I</b> putting the team before myself?</p>



**Our Code of**



# How do the ethical principles help us?

Our ethical principles support each of us to make good decisions.

They are underpinned by a simple set of questions we can all ask ourselves as we go through our own decision-making processes. Apply these to our commitments to challenge our thinking and ways of working.

In times when we need deeper reflection, our Decision Explorer will help us apply these ethical principles, guiding us towards the right choice and enabling us to continue doing what's right.

When we think about the standard of behavior we expect from ourselves and each other across Novartis, our values and ethical principles should come to mind. We must ensure that we adhere to the local laws and regulations of the markets in which we operate.

**Be Open-minded**

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**Be Honest**

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**Be Bold**

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**Be Accountable**

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# Our commitments

In this section, we provide an outline of our commitments.

We explain why these areas are important and how these commitments help us to show up as a trusted partner.

The commitments are a point of reference for all of us and provide clarity about the behaviors we expect to see from ourselves and others. Our ethical principles and Decision Explorer will guide you in living these commitments and support you to do what's right.

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**Access to medicines**

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**Animal welfare**

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**Anti-corruption**

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**Antitrust and fair competition**

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**Artificial intelligence**

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**Business continuity and crisis management**

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**Conflicts of interest**

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**Customs and trade compliance**

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**Data use**

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**Diversity and inclusion**

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**Drug safety**

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**Environmental sustainability**

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**Fair employment practices**

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**Financial integrity**

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**Health and safety**

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**Human rights**

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**Information and cyber security**

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**Insider trading**

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**Patient engagement**

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**Professional practices**

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**Research and development**

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**Responsible lobbying**

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**Third party risk management**

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## Access to medicines

### Our commitment

**To bring more of our medicines to more people, no matter where they are.**

We will systematically integrate access strategies into how we research, develop and deliver all our new medicines globally.

### Why it matters

Many people still lack access to essential medicines and healthcare. As the size and complexity of the world's healthcare challenges continue to grow, we want to extend our impact addressing the needs of underserved patient populations.

## Animal welfare

### Our commitment

**To refine, reduce or replace animal studies wherever possible.**

We will uphold the highest standards in animal welfare in all of our animal studies as we strive to deliver safe, effective and transformative medicines to millions of patients around the world.

### Why it matters

The welfare of animals in Novartis studies is a primary concern to us for reasons of ethics, accuracy, reliability and applicability of scientific studies. Good animal welfare is a prerequisite for good science.

## Anti-corruption

### Our commitment

**To not tolerate any form of bribery or corruption.**

We will not give, offer or promise to give anything of value or accept, request or agree to receive anything of value for the purpose of improperly influencing any decisions. We will not use third parties to commit acts of bribery or corruption.

### Why it matters

To improve access to medicine we need to address corruption. It erodes trust in both governments and business, and reduces access to public services including health and education.

## Antitrust and fair competition

### Our commitment

**To engage in fair competition and compete on the merits of our products.**

We will not engage in agreements or conduct that unlawfully prevent or restrict competition. We are proud to compete on the merits of our products alone.

### Why it matters

Competition drives innovation and leads to greater choice of higher quality products at competitive prices, benefiting patients and society.

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## Artificial intelligence

### Our commitment

**To deploy artificial intelligence (AI) systems in a transparent and responsible way.**

We will ensure that the use of AI systems has a clear purpose that is respectful of human rights, and is accurate, truthful, not misleading, and appropriate for their intended context.

### Why it matters

AI can help Novartis increase patient access, improve customer experience, drive automation, provide predictive analytics and detect potential misconduct. It also has the potential to be used to improve the speed and accuracy of diagnosis, treatment protocols, drug discovery, drug development, patient monitoring, and patient care, among other applications that will improve patients' lives and optimize the healthcare ecosystem.

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## Business continuity and crisis management

### Our commitment

**To ensure uninterrupted supply of key products and services to patients.**

We will take all reasonable precautions to protect patients, associates, assets and the business from a disruptive incident.

### Why it matters

Our medicines save and prolong people's lives. Patients, associates and our business rely on the continuous supply of our products.

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## Conflicts of interest

### Our commitment

**To ensure our business judgement is not influenced by personal interests.**

We will disclose and manage potential, perceived and existing conflicts of interest.

### Why it matters

To maintain trust and confidence with all our stakeholders, we must ensure that we make decisions that are in the best interest of Novartis.

## Customs and trade compliance

### Our commitment

**To comply with customs regulations, export controls, and trade sanctions laws.**

We will ensure that we do not engage with persons or companies that have been placed by governments on sanctioned party lists. We will comply with regulations and laws that govern the distribution and use of our products in markets in which we choose to operate.

### Why it matters

Complying with customs regulations, export controls, and trade sanctions laws allows us to deliver our medicines in a timely manner to patients who need them, whilst building trust with society.

## Data use

### Our commitment

**To use personal information that we are entrusted with in a responsible way.**

We will adhere to our Data Privacy principles and ensure our external service providers also commit to these principles.

### Why it matters

The responsible use of data helps us maintain trust with stakeholders, including associates, patients, health care professionals and society. It ensures we will continue to have access to the kind of data we need to innovate and operate.

## Diversity and inclusion

### Our commitment

**To create a diverse and inclusive environment that treats all associates with dignity and respect.**

We will educate our people on inclusivity and provide all associates with equal opportunities to contribute to our company and advance their careers.

We will listen to different communities with a learning mindset, to do what we can to contribute to building a world that is safer and more inclusive.

### Why it matters

Being inclusive of all individuals helps us to generate new ideas, drive innovation, understand our stakeholders and be closer to patients.

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## Drug safety

### Our commitment

**To follow strict safety monitoring and evaluation processes at every stage of the product lifecycle.**

We will report adverse events within 24 hours of discovery to the Novartis Safety Department and quality complaints to Quality Assurance, and then transparently communicate the risks of our medicines and devices to regulatory authorities.

### Why it matters

The safety of medicines and treatment of patients worldwide is of critical importance. Medicines and treatments can have potentially undesirable effects. Reporting those adverse events is critical in order to take appropriate actions to safeguard patient safety.

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## Environmental sustainability

### Our commitment

**To minimize the environmental impact of our activities and products over their lifecycle.**

We will strive for a positive effect on climate, by reducing our carbon footprint, waste and water usage and making efficient use of natural resources.

### Why it matters

As members of society, we have to protect the environment for future generations.

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## Fair employment practices

### Our commitment

**To create a safe place to work, where all of our associates have an equal opportunity to succeed.**

We will not tolerate discrimination, harassment, retaliation, bullying or incivility. We value the contributions of all of our associates, and encourage them to express themselves and their opinions freely in a professional way.

### Why it matters

Fair employment practices benefit all our associates, as well as society, and provides the integral foundation to support our commitment to human rights.

## Financial integrity

### Our commitment

**To provide timely, accurate and complete financial information to our shareholders and financial markets.**

We maintain effective controls over financial reporting to ensure a complete and accurate record of our financial transactions.

### Why it matters

Proper oversight and accountability of Novartis assets helps us meet our financial, legal and regulatory obligations, ensuring that we remain a trusted partner.

## Health and safety

### Our commitment

**To protect and promote the health and safety of our associates, contractors, visitors, patients and the communities in which we operate.**

We ensure a rigorous process to identify and mitigate health and safety risks, and promote leading health and safety best practices.

### Why it matters

To reimagine medicine, maintaining a healthy, safe and environmentally friendly workplace for our associates, contractors, vendors and visitors is key. Taking care of our own people enables them to help take care of our patients.

## Human rights

### Our commitment

**To conduct our business in a manner that respects the rights and dignity of all people.**

We will strive to prevent, mitigate and remedy adverse human rights impacts throughout our workplace, business operations and in the communities in which we work. We want to protect people from abuse by those who are more powerful.

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### Why it matters

Respect for human rights is an ethical obligation and an opportunity for transformative change in people's lives.

## Information and cyber security

### Our commitment

**To protect our data and technology and ensure that information is kept safe from theft, loss, misuse or disclosure.**

We will take accountability for the information and technology we handle.

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### Why it matters

Having access to the right information is instrumental to achieving our vision. At the same time, we have an obligation to safeguard our patients' and partners' information.

## Insider trading

### Our commitment

**To not engage in insider trading.**

We will not misuse insider information, or other non-public information that could have an impact on the price of Novartis securities or the securities of any other company with which we do business.

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### Why it matters

The public and our investors must be able to trust we do business with integrity. Using inside information for personal gain, or for recommending to another person to buy or sell Novartis shares or the securities of any other company with which we do business creates an uneven playing field for investors.

## Patient engagement

### Our commitment

**To consistently and systematically engage patients along the medicine's lifecycle.**

Together with patients we can reimagine medicine by developing innovative medicines faster and creating broader access.

### Why it matters

Patients deserve to live their best lives possible. Co-creation with the community is necessary to optimize the benefit of medicines for patients and society.

## Professional practices

### Our commitment

**To maintain high standards of ethical business conduct.**

We are committed to the same high standards of ethical business conduct wherever we do business. We will adhere to our P3 principles, which help to guide our daily decision-making.

### Why it matters

Interacting in an ethical manner and operating with integrity has a profound impact on finding new ways to expand patient access to our treatments and building trust with society.

## Research and development

### Our commitment

**To conduct research and development for the right reasons.**

We will respect the rights, safety and dignity of individuals and communities, protect scientific integrity and strive to advance the practice of medicine. We will make sure that any data or information that we create or are responsible for, is true, accurate and fair. We do not make false or misleading statements.

### Why it matters

Patients, associates, shareholders, healthcare partners and society must be able to trust that we conduct research ethically and with integrity. Without their trust, our efforts to reimagine medicine will be compromised.

## Responsible lobbying

### Our commitment

**To share fact-based information in a transparent way, and take the perspectives of all relevant stakeholders into account.**

We will engage in public discourse on issues of societal and political nature that are linked to our mission of reimagining medicine and our ability to deliver breakthrough innovation.

### Why it matters

Contributing to the development of policies that are beneficial for society builds trust. Data and insights provided to policy makers enables them to make better informed decisions to help improve patient outcomes.

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## Third party risk management

### Our commitment

**To work with third parties who operate in a manner that is consistent with our values and ethical principles.**

We will select the parties best suited for our business and society based on objective criteria, evidencing their competence, integrity, and other relevant merits. We will strive to ensure that throughout our relationship, the third party continues to uphold the same standards.

### Why it matters

Our success depends on strong, reliable and reputable partners. They help us build trust with all of our stakeholders by living up to the same standards.

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If we all bring our Code of Ethics to life and use it to guide our individual work, we'll build lasting trust with society.



# Our responsibilities

## Accountabilities

Upholding our commitments will take leadership from each of us. We are all personally accountable for adhering to our Novartis Code of Ethics, as well as our Novartis policies, guidelines and local laws. In case of uncertainty we are responsible for seeking advice from the local Ethics, Risk & Compliance function or any other support or assurance function.

and other associates involved in the investigation.

Every complaint is taken seriously. Any associate who raises a potential misconduct concern, assists or provides information during an investigation, or otherwise acts in good faith in the best interests of Novartis will be protected against retaliatory action.

## Breaches

Breaches of this Code of Ethics, as well as our policies, guidelines or local laws, will result in remedial, corrective or disciplinary actions up to and including termination of employment. It is an obligation for each of us to report actual or suspected incidents of misconduct to the SpeakUp Office. Novartis guarantees non-retaliation and confidentiality, to the extent legally possible, for good-faith reports of such breaches.

The SpeakUp Office and related investigative functions will handle every matter in compliance with the principles set forth by the Novartis Global Data Privacy Policy. The necessary steps will be taken to protect the confidentiality of the reporter

## Applicability

This Novartis Code of Ethics was approved by the Novartis AG Board of Directors on April 23, 2020. It is to be implemented by all Novartis affiliates with an effective date of September 1, 2020. It is applicable to all operations and associates of the Novartis Group. It replaces the Novartis Code of Conduct of July 1, 2011.

When we set out to create our Code of Ethics, we enlisted the support of Novartis colleagues across the world to ensure that our Code would be meaningful, inspiring and most importantly, useful for everyone.

This is so much more than a policy, and more than a document – it is a collection of voices, sharing the commitments we make to build trust with society.

To the many associates who have helped shape our Code of Ethics, thank you. Your contributions have made a clear statement that together, we are fully committed to doing what's right. This Code belongs to you, and to every associate across Novartis. We are each accountable for ensuring it stays top of mind in our decision-making, and is used often in driving open, honest conversations.

Of course, our Ethics, Risk & Compliance function and all other support and assurance functions are here to help, so please continue to reach out whenever you need more support.

**Klaus Moosmayer**

Chief Ethics, Risk & Compliance Officer



warda yasmin carlos benjamin ann-charlott christof ina frederick edward klaus jan tania suneel clara suryasai juan-jorge annett ben irina karin orly whitney vicky vasiliki anna sonia costas shine tatiane natalia pala luciano juan luis ezequiel chris urs kristen margaret jennifer jana gregory antoine shepard sridevi monika natasha niamh mu ted elisenda alice yi-fang stephan dominik pegah klaus dharmesh rob gergaa andrea maxim frank jean michel johan michael germana antonio lara valentina nadia alison paolo giuseppina jamie alessandro maria giovanna jinwoo jing yi marc teresa susanne tahasin enrique collins govindraj karen katja deepak rajeev oleksandra remi johan suraj rohan emtiaz jarungjit narinthip emmanuel tanzina iftekhar nadia mohamed shahed mohamed mashrur christophe redwan monirul martha anja rusette joseph dabrowka hans ferdous federica peter nitin david dijana aviv paolo fariha thomas kuanhan meggi narongchat brett fernanda natalie anne ahmed celestina inna djordje leslie fenella claudia joris aimee christina simon shane natascha saliha victoria lisa stefanie sarah christian dario hiroaki adnan lucas luise isabelle guy sanjay andrew saneev nadya michael jiyi srikanth emrah marek gerlinde anne peng tanya bettina srinivas alice elitsa amit subhash karen angela borislava marco yana olivia xin ulrike ana maria ales aurelie thelma akio meira ingeborg aga veronica vladimir ksumanth lisa katarzyna daniela elena montserrat leo firdevs marcella nilson jordane karmen jackeline athanasios ruthel roman yukihide anvita shogo ming virginie alexandr gerry luciana rocio john dharmendra elke tania eduardo juan alejandro shashwata thomas konstantinos shirley ekaterina frank jeremy michelle vatsal joel susie andrew stijn michael frank nyokabi silvio joanna elisabeth hideki evgeniya kyoko angelika kathryn venera tatyana irina katerina paul georgios mary alexandra evgeny tatiana ekaterina alexey natasa anna elena marilena natalia angeliki sumaiya sadia lefki prashant kelly biljana marie genevieve mario susan elke.de de vaska arun petra nejc jaka steffen sean angel umit rani abhishek harry michaela christopher bertrand mette eva-sophie winus victoria miha stine jeroen nina virginia andre sheena tomislava morihiko makoto desiree dennis vera kelliyy roberta reham motasem hossam reda belen isabela rosangela gabor shawn mirna matheus claudia olga efthymia laura elena francesca marilena davide olga martin mei dmitriy svetlana valeriy natalia alexander kirill claudia bislan olga lidiya suat samra elyse luka evangelia karen eva franziska meenu adam antoni padmaraj marielaure robert edmund bupe anne-sophie julia helen zina evelyne joffroy ann-merie jean-francois anne nina aleksandra ovidiu ravi mia jean qian ru katy tom irena michael indumathy tom juergen neelima jayanthi liana lisa olga lucia eric adriana michael alain suzy vera wannes sigrid sergey philippe susanna lydia carina marta octavio lorilie michael heidi lisa suzan harini kristen maral chantale salah akanksha chetan kim skafte lisa stanislaw nathalia michal lorenzo satish carine raj kumar corey patrick ana lovneet diane eoin maria nadine laetitia diego junaid rehan jairo arturo lesley nagesh georgina lilena felix allan steven shilpi hanzey anouk dana holger darisha adrienne katerina mariana aaron lorriann carsten christina mansi cally tilak dorothy yolanda marisa zia florent meinrad annalisa samantha rohan meriem tahar rym christophe gabriela ben rhita marisa emanuela kenza ghizlaine loren roberta vera nichole isabela julie sonia khadija max juliana omnia mohamed marwan kaisa silvio carina ilse heidi ravi roman yi-fang giulliano anchalee christopher nuri leen filipe roser vidal miguel laura roberta ana maria maria eloy elisabet laura marc antonio elisa mariajose margarita diarra miriam patricia laura dylan jose antonio ingrid nuria david alberto neus luis