

# **Complaints procedure according to the German Supply-Chain-Due- Diligence Act (SCDDA)**

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# 1. Introduction

This document is addressed to all employees of the Novartis and Sandoz companies as well as all external persons who wish to address a complaint within the framework of **German Supply-Chain-Due-Diligence Act (SCDDA)** = (*Lieferkettensorgfaltspflichtengesetz* (LkSG)).

In the second chapter of this document, we wish to provide you with Step-by-Step instructions and suitable screenshots to help you use our electronic **online complaints procedure** (Novartis SpeakUp Officeline) so that you may indicate risks or breaches under human rights law or environmental law in the business area itself of Novartis or Sandoz and in the area of the supply chain (direct and indirect suppliers) of Novartis or Sandoz.

The third chapter of this document explains Step by **Step how you can address a telephone complaint** to us regarding the SCDDA.

In both complaints procedures, the following protected legal positions are in the foreground according to **German Supply-Chain-Due-Diligence Act (SCDDA)**, but are not exclusively limited to:

- 1) Prohibition on Child Labour
- 2) Prohibition on Forced Labour
- 3) Prohibition on Slavery or slavery-like Practices; Modern Slavery
- 4) Prohibition on disregard of Occupational Health & Safety
- 5) Prohibition on a disregard of Freedom of Association
- 6) Prohibition on Discriminatory Employment Practices
- 7) Prohibition on withholding an appropriate/Minimum Wage
- 8) Prohibition on harmful soil changes, water pollution, air pollution, harmful noise emissions or excessive water consumption (pollution & water stewardship) that could
  - a) significantly impair the natural basis for the preservation and production of food.
  - b) deny one or more person's access to proper drinking water.
  - c) hinder or eliminate access to sanitary facilities for one or more persons.
  - d) damage the health of one or more persons.
- 9) Prohibition on Unlawful Eviction and Unlawful Expropriation of Lands, Forests and Waters
- 10) Prohibition on the engagement or use of private or public security forces to protect a business project if, due to a lack of instruction or control by the company, the use of security forces
  - a) could disregard the prohibition of torture and cruel, inhuman, or degrading treatment,
  - b) poses a threat to life and limb
  - c) or poses a threat to freedom of association and coalition.

The fourth chapter of this document gives you an overview of the SCDDA-related complaint process at Novartis or Sandoz.

## 2. Step-by-Step instructions (online complaint)

### 2.1 Entering and sending the complaint

#### Step 1:

Call up the electronic complaints procedure (Novartis SpeakUp Officeline) via the following [link](#) or the link provided on the website: [link to the complaints system \(SpeakUp\)](#) and continue to Step 2.

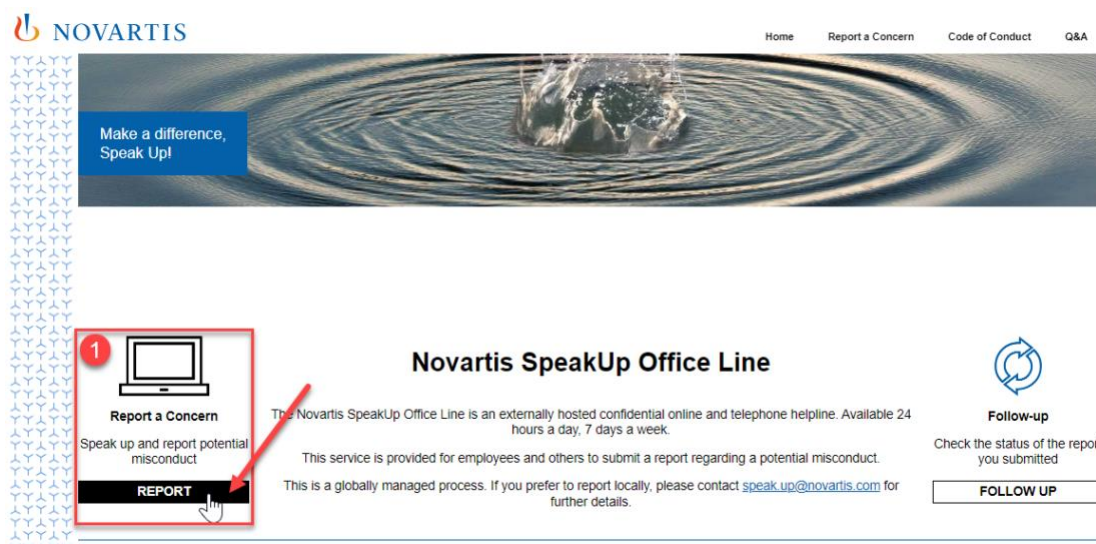
The screenshot shows the Novartis SpeakUp Office Line entry screen. At the top, there is a language selection bar (1) with various languages including English, العربية, Български, বাংলা, Босански, Čeština, Dansk, Deutsch, Español, Español (European Union), Eesti, Suomi, Français, Ελληνικά, עברית, हिन्दी, Hrvatski, Magyar, Indonesia, Italiano, 日本語, 한국어, Bahasa Melayu, Brunei, Lietuviškai, Latviešu, Македонски, Nederlands, Norsk, Polski, Português (European Union), Română, Русский, Slovenčina, Slovensčina, ગુજરાતી, ગુજરાતી, Cymraeg, Svenska, தமிழ், Türkçe, العربية, Tiếng Việt, 繁體中文, 中文(简体). Below this is the Novartis logo and a navigation bar (2) with links: Home, Report a Concern, Code of Conduct, Q&A. The main header features the slogan "Make a difference, Speak Up!" and a background image of a globe. The central section is titled "Novartis SpeakUp Office Line" and contains the following information: "The Novartis SpeakUp Office Line is an externally hosted confidential online and telephone helpline. Available 24 hours a day, 7 days a week." (3) "This service is provided for employees and others to submit a report regarding a potential misconduct." (4) "This is a globally managed process. If you prefer to report locally, please contact [speak.up@novartis.com](mailto:speak.up@novartis.com) for further details." (5) To the left of this text is a "Report a Concern" button (3) with a laptop icon and the text "Speak up and report potential misconduct". To the right is a "Follow-up" button (4) with a circular arrow icon and the text "Check the status of the report you submitted". Below the central text is a warning box (6) stating: "Attention! This is not a mechanism to report an emergency situation. If your complaint is in regards to an Adverse Event, please report via the psi reporting tool at <https://psi.novartis.com>. If you suspect or know that a security incident has taken place, always report it immediately to the Novartis IT Service Desk - <http://go/ITSD>. In case of emergencies, contact the Security Operations Center by phone: Phone: +420 225 775 050 (backup number: +420 225 850 012) or Email: [soc@novartis.com](mailto:soc@novartis.com)". At the bottom is a footer box (7) containing copyright information: "Copyright © 2000-2023 NAVEX Global, Inc. All Rights Reserved. [Privacy Statement](#) | [Acceptable Use Policy](#) | [Cookie Statement](#) | [Contact NAVEX](#)".

#### Brief overview of the different areas in the entry screen:

- **Area 1:** The language displayed in the electronic complaints procedure (Novartis SpeakUp Officeline) can be changed here. Please note that the description given here is currently available in English and German, only.
- **Area 2:** Link to further information in English or German. "Report a Concern" leads directly to the view described in Chapter 2 and 3 in Step 3 respectively.
- **Area 3:** See Step 2 in this Chapter.
- **Area 4:** See Step 22 in Chapter 2.3 "Follow-up of the complaint in further course of processing".
- **Area 5:** Please **do not** use this e-mail address to make complaints regarding German Supply-Chain-Due-Diligence Act (SCDDA), use the online or telephone complaint process described in Chapter 2 or 3 here, only. Contact [speak.up@novartis.com](mailto:speak.up@novartis.com) (see Chapter 4) only with questions that go beyond the contents of this document.
- **Area 6:** Reference to reporting channels for other types of reports, such as adverse events report for Novartis or Sandoz medicines or security incidents. Please **do not** use these email addresses to make complaints regarding the German Supply-Chain-Due-Diligence Act (SCDDA).
- **Area 7:** General information from the software tool operator NAVEX.

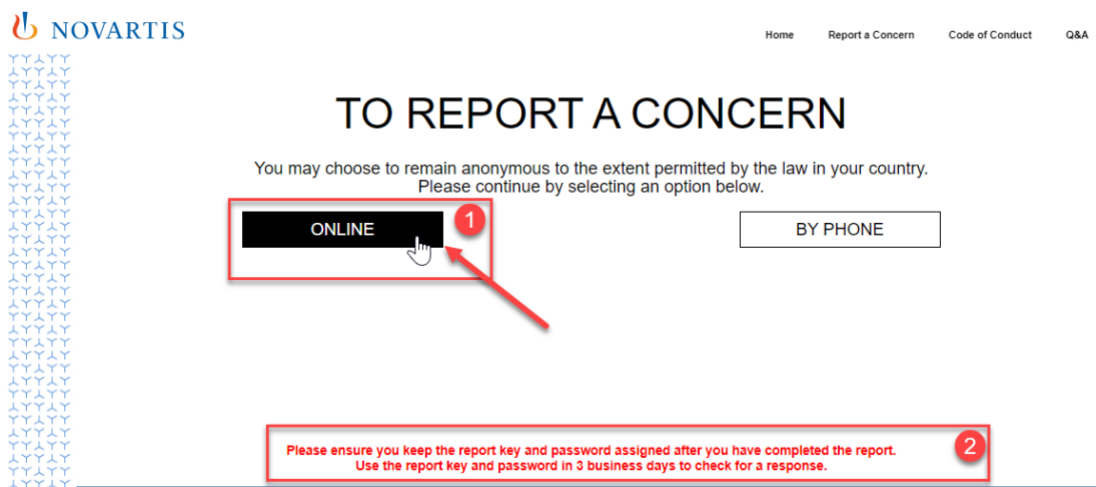
## Step 2:

Place the mouse pointer in the highlighted Area 1 and press the left mouse button to go to the view for submitting an online complaint.



## Step 3:

Place the mouse pointer in the highlighted Area 1 and press the left mouse button to continue submitting online complaints.



**Area 2:** Please note the information highlighted in Area 2. At a later stage in the process outlined here, you will receive a report key and password that you must write down and carefully keep, to view the future processing status of your complaint!

#### Step 4:

Place the mouse pointer in the highlighted Area 1 and press the left mouse button. Then select the country in which you are located in Area 2 (e.g. Germany).

NOVARTIS

Home Report a Concern Code of Conduct Q&A

## TO REPORT A CONCERN

You may choose to remain anonymous to the extent permitted by the law in your country.  
Please continue by selecting an option below.

**ONLINE** BY PHONE

Select the country / region which you are located.

- Select -

- French Guiana
- French Polynesia
- French Southern Territories (the)
- Gabon
- Gambia (the)
- Georgia
- Germany**
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti

key and password assigned after you have completed the report.  
Use the report key and password in 3 business days to check for a response.

If your complaint is in regards to an Adverse Event, please report via the psi reporting tool at <https://psi.novartis.com>  
When place, always report it immediately to the Novartis IT Service Desk - <http://go/ITSD>  
Operations Center by phone: Phone: +420 225 775 050 (backup number: +420 225 850 012)  
or Email: [soc@novartis.com](mailto:soc@novartis.com)

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#### Step 5:

Proceed as described in Step 4 and select the country or region where the reportable violation occurred (e.g. Germany).

NOVARTIS

Home Report a Concern Code of Conduct Q&A

## TO REPORT A CONCERN

You may choose to remain anonymous to the extent permitted by the law in your country.  
Please continue by selecting an option below.

**ONLINE** BY PHONE

Select the country / region which you are located.

Germany

Select the country / region in which the violation took place.

- Select -

Please ensure you keep the report key and password assigned after you have completed the report.  
Use the report key and password in 3 business days to check for a response.



### Step 6:

Proceed as described in Step 4 and select the division or business unit where the violation occurred. If you do not know the relevant division or business unit or if the violation occurred outside the Novartis Group, e.g. in the supply chain, please select "Other / Unknown".

### Step 7:

Place the mouse pointer in the highlighted Area 1 and press the left mouse button to access the "Novartis SpeakUp Officeline" and the Privacy Statement for a general explanation.

**Step. 8:**

Please, carefully read the general statement on the “Novartis SpeakUp Officeline” and the data protection statement in the highlighted Area 1. Then place the mouse pointer in the highlighted Area 2 and press the left mouse button to go to the selection of topics where concerns can be raised online.

**Novartis SpeakUp Office Line**

The use of the Novartis SpeakUp Office Line offers the opportunity to report information concerning actual or suspected misconduct. Do not report information through this channel if doing so is unlawful in your country.

The technical support and administration of this online platform is operated and maintained by NAVEX, Inc., USA, the data is stored on secure servers located in Germany and the Netherlands. The information provided through this online platform will be assessed by the Novartis SpeakUp Office. The SpeakUp Office evaluates the risk attached to the concerns and ensure proper follow up either by initiating an independent investigation for higher risk issues, or a review at a local level. To do so, SpeakUp Office engages the most appropriate function to investigate and establish the facts, so that the respective management level may take necessary actions.

SpeakUp Office and related investigative functions will handle every matter as confidential and in compliance with the principles set forth by the Novartis Policy on the Protection of Personal Information. As a general principle, as few associates as possible should be informed of such complaints, and only on a need to know basis, balanced against the need to conduct an appropriate and thorough investigation of the claims (e.g., for business needs, investigations, or resolution of the matter).

**Privacy Notice**

The personal information collected through this website is used only for the purpose of receiving and investigating reports of potential misconduct of Novartis associates. The information is treated in accordance with applicable law and Novartis policies and based on the legitimate interest of the Novartis group of companies in ensuring compliance with law and internal policies. Data controller is Novartis International AG, Basel, Switzerland. If you have questions regarding your personal data or if you wish to exercise your data privacy rights, please contact [privacy.switzerland@novartis.com](mailto:privacy.switzerland@novartis.com).

**2** Continue Cancel



### Step 9:

Place the mouse pointer in the displayed Area 1 “Other” and press the left mouse button to activate the entry screen, in which you can enter information to indicate risks or breaches under human rights law or environmental law in the business area itself of Novartis or Sandoz and in the area of the supply chain (direct and indirect suppliers) of Novartis or Sandoz. Please **do not** use the other options in the highlighted Area 2. In the following entry screen (see Step 11), you can also decide to remain anonymous.

The screenshot shows the 'TO REPORT A CONCERN' form. At the top, it says 'You may choose to remain anonymous to the extent permitted by the law in your country.' Below this, it asks the user to select a category. A large red 'X' is drawn over the entire category list. A red circle with the number '2' is placed over the 'Company Confidential / Trade Secret Information' category. A red circle with the number '1' is placed over the 'Other' category at the bottom right. The 'Other' category is highlighted with a red border. The form includes a table with the following categories: Antitrust, Fair Competition; Books & Records, Accounting Irregularities; Bribery & Kickbacks; Company Confidential / Trade Secret Information; Conflict of Interest; Data Privacy; Discrimination & Sexual Harassment; Expense Fraud; Fraud / Asset Misappropriation; Improper Professional Practices; IT Security Breach; Quality Assurance/Data Integrity; Retaliation; Other Employee Relations Issues; and Other. Each category has a 'Details +' link to its right.

Expand all - Collapse all	
Antitrust, Fair Competition	Details +
Books & Records, Accounting Irregularities	Details +
Bribery & Kickbacks	Details +
Company Confidential / Trade Secret Information	Details +
Conflict of Interest	Details +
Data Privacy	Details +
Discrimination & Sexual Harassment	Details +
Expense Fraud	Details +
Fraud / Asset Misappropriation	Details +
Improper Professional Practices	Details +
IT Security Breach	Details +
Quality Assurance/Data Integrity	Details +
Retaliation	Details +
Other Employee Relations Issues	Details +
Other	Details +

### Step 10:

After the “Other” field has been opened/expanded by Step 9, place the mouse pointer in the displayed Area 1 “Other” and press the left mouse button to finally access the entry screen.

The screenshot shows the 'Other' entry screen. It has a red border. At the top left, it says 'Other'. At the top right, there is a red circle with the number '1' and a 'Details -' link. Below this, it says 'Any items, which are not reflected in the above listed categories. This can include but is not limited to social media issues, clinical trials misconduct, and intentional deviation in the procurement process.' A mouse cursor is pointing at the bottom right corner of the screen.

### Step 11:

Please complete the first section of the entry screen as described. The fields marked with a red asterisk are “mandatory fields”:

- **Area 1:** Please read the “Terms and Conditions” and confirm by pressing the left mouse button to mark the white field accordingly (mandatory field).
- **Area 2:** Your entries from Step 6 are automatically transferred to this area.
- **Area 3:** Place the mouse pointer in the highlighted Area 3 and press the left mouse button to select the relationship you have with Novartis (Novartis or Sandoz Associate/ Third Party), or whether you want to remain anonymous (mandatory field).
- **Area 4:** If you want to remain **anonymous** as a reporter, left-click the white box next to “Yes” and the data fields for name, phone number and email address (**Area 5**) will be hidden automatically.

If you **do not want to remain anonymous** as a reporter, please left-click to highlight the white box next to “No” and fill in the blank fields with your name, phone number and email address.

# NAVEX™

You are now in an EthicsPoint Secure Area | [File a Report](#)

ETHICSPPOINT IS NOT AN EMERGENCY SERVICE.

Do not use this site to report events presenting an immediate threat to life or property. Reports submitted through this service may not receive an immediate response. If you require emergency assistance, please contact your local emergency services. If your complaint is in regards to an Adverse Event, please report via the psi reporting tool at <https://psi.novartis.com>

☐ \* Yes - I agree to the [Terms and Conditions](#) of making this report.

**Please provide information as follows:**

( \* Required fields )

Organization **Novartis**

Location/Site where incident occurred: Germany - Other / Unknown

Physical address, branch

City:

Zip/Postal Code:

Country: Germany

\* **What is your relationship to Novartis?**

- Select One -

\* **Do you wish to remain ANONYMOUS for this report?**

☐ Yes ☐ No

**If you want Novartis to know your identity, please complete the following:**

Your Name:

First Name

Last Name

Your Phone Number:

Your E-mail Address:

**Step 12:**

Please scroll down the entry screen with the mouse wheel or scroll bar to the “Report - Other” position shown below and continue filling in the open fields.

- **Area 1:** If you know the names and job titles of the people involved in the matter of your complaint, please enter these details in the open fields.
- **Area 2:** If you do not know the names and job titles of individuals involved in the matter of your complaint, we would like you to provide information that you believe will assist us in identifying the persons involved.
- **Area 3:** If you, as a reporter, know or suspect that a manager (supervisor or manager) is involved in the matter of your complaint, left-click to highlight the white box next to “Yes” and tell us, if possible, the name(s) in **Area 4**. If you do not know or suspect this or do not wish to provide any information, press the left mouse button to mark the white field next to “No” or “Do Not Know/ Do Not Wish To Disclose”.
- **Area 5:** If you, as a reporter, know that management is already aware of the issue of your complaint, left-click to highlight the white box next to “Yes” or select the white box next to “No” or “Do Not Know / Do Not Wish To Disclose”.

### Report - Other

**Please identify the person(s) engaged in this matter:**

	First Name	Last Name	Job Title
#1	<input type="text"/>	<input type="text"/>	<input type="text"/>
#2	<input type="text"/>	<input type="text"/>	<input type="text"/>
#3	<input type="text"/>	<input type="text"/>	<input type="text"/>
#4	<input type="text"/>	<input type="text"/>	<input type="text"/>
#5	<input type="text"/>	<input type="text"/>	<input type="text"/>

John Doe, Information Technology Manager; Unknown, Unknown, Night Supervisor

**If you haven't identified anyone, please provide additional details:**

**Do you suspect or know that a supervisor or manager is involved?**

☐ Yes ☐ No ☐ Do Not Know / Do Not Wish To Disclose

**If yes, then who?**

John Doe, Information Technology Manager; Unknown, Unknown, Night Supervisor

Any persons mentioned here will be restricted by EthicsPoint from access to this reported information.

**Is management aware of this matter?**

☐ Yes ☐ No ☐ Do Not Know / Do Not Wish To Disclose

### Step 13:

Please scroll the entry screen with the mouse wheel or scroll bar to the position shown below to be able to specify your complaint in more detail.

- **Area 1:** To make it easier for us to classify your complaint, start the description of your complaint with the short text: **“Complaint, Supply-Chain-Due-Diligence Act (SCDDA):”**. Read the text above and to the right of the input field and describe the subject matter of your complaint, with reference to the protected legal positions mentioned in the introduction of this document (1 - 10) as precisely and in detail as possible.
- **Area 2:** To further substantiate your complaint, please provide us with a time period, date and/or duration of the matter of your complaint, if possible.
- **Area 3:** To further substantiate your complaint, please tell us the location where the matter of your complaint took place. If you have knowledge of any specific documentation relating to the reported incident, please provide us with the documentation or business transactions that you have become aware of in the matter of your complaint. In addition, you can attach these documents as files to your complaint in Step 14 / Area 4.

**★ Provide all details of the alleged misconduct e.g. what happened, who was involved, when did it happen, where did it happen, details on potential witnesses. Please describe each allegation separately.**

1

Complaint, Supply-Chain-Due-Diligence Act (SCDDA):

Please take your time and provide as much detail as possible, but exercise care to not provide details that may reveal your identity unless you wish to do so. It may be important to know if you are the only person aware of this situation.

**When and for how long did this matter occur?**

2

Tuesday, May 3, 2002; Two weeks ago; Approximately a month ago

**Where did this matter occur?**

3

We recognize that this incident may not have occurred in a particular location. However, if this incident was observed in some documentation or business transactions, please indicate this accordingly.

**Step 14:**

Please scroll the entry screen with the mouse wheel or scroll bar to the position shown below to be able to specify your complaint in more detail.

- **Area 1:** Place the mouse pointer in the highlighted Area 1 and press the left mouse button. Then select one of the 8 options you became aware of the matter of your complaint. If you have selected the option “Other”, please specify this in more detail in the free text field below.
- **Area 2:** If you can assign an estimated financial value to your complaint, place the mouse pointer in highlighted Area 2 and press the left mouse button to select the appropriate currency for your estimate.
- **Area 3:** If you can assign an estimated financial value to your complaint, place the mouse pointer in highlighted Area 3 and press the left mouse button to select the appropriate amount range (e.g. EUR 1000 – EUR 4999) for your estimate.
- **Area 4:** To complement your complaint with meaningful electronic documents, place the mouse pointer in the text field described and follow the instructions to add those documents to your complaint.
- **Area 5:** By sending your complaint (see area 7 below), you receive a so-called report key that clearly identifies your complaint. Please make a note of the report key as in the further course of the complaint process access to your complaint can only be granted via a combination of your password assigned in area 6 and the report key.
- **Area 6:** Select a password with at least 4 characters and enter it in the free text fields provided. Please make a note of the password as you can only be granted access to your complaint through the combination of your assigned password and the report key during the further course of the complaint process.
- **Area 7:** Check your details one last time by scrolling through the input screen, place the mouse pointer in the displayed Area 7 “Submit Report” and press the left mouse button to finally send your complaint to us for processing.





## 2.2 Inspection of complaint immediately after dispatch

### Step 15:

As soon as you have sent your complaint in Step 14, you will receive the view shown below to confirm that it has been sent. In Area 1 you can see the information with your individual report key. Please keep the report key **and** the password assigned by you in Step 14 / Area 6 to be able to follow up on the processing status of your complaint in the future.

According to the information in Area 3, it will take approximately three working days to process your complaint, depending on the scope. After three working days, please check at regular intervals whether Novartis has any further questions for you with regards to your complaint.

Please do not use the telephone number (1-866-ETHICSP) provided in Area 4, as this number cannot be reached from Germany, currently.

Use the internet address [www.ethicspoint.eu](http://www.ethicspoint.eu) specified in Area 5, to go to English-language view (see Step 16) alternatively, place the mouse pointer in the highlighted Area 6 and press the left mouse button to come to the same English-language view (see Step 16).

**NAVEX™**  
You are now in an EthicsPoint Secure Area | [File a Report](#)

**1** YOUR REPORT KEY IS:  
**XXXXXXXXXXXXXX**

**2** WRITE THIS DOWN AND KEEP THIS IN A SAFE PLACE!  
You will need your report key and the password you selected to check on your report in the future or to make a follow-up.

**3** PLEASE ALLOW 3 BUSINESS DAYS FOR PROCESSING AND REVIEW  
Begin checking after 3 business days and then continue to check periodically to see if the organization has any additional questions for you to answer regarding your report.

HOW TO FOLLOW-UP ON A REPORT

**5** Go to [www.ethicspoint.eu](http://www.ethicspoint.eu) **OR** ~~Call our toll-free hotline at 1-866-ETHICSP~~ **4**

**6** [Return to EthicsPoint home](#)

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PRIVACY FEEDBACK  
Powered by TRUSTe  
SAS70  
Type II Certified

### Step 16:

In Area 1, enter your individual report key and the password you've assigned in Step 14 / Area 6 in the fields provided. Place the mouse pointer on the "Submit" field and press the left mouse button.

NAVEX

Client Login

**File a New Report via EthicsPoint®**

Enter Organization Name

Submit

**Follow-up on an Existing Report** 1

Report Key

XXXXXXXXXXXX

Password

XXXXXXXXXXXX

Submit

Providing anonymous, confidential hotlines for organizations worldwide.

NAVEX's goal is to ensure that you can communicate issues and concerns associated with unethical or illegal activities safely and honestly with an organization's management or the board of directors while maintaining your anonymity and confidentiality.

We strive to make reporting issues and concerns via EthicsPoint® as straightforward and uncomplicated as possible. The following web pages will guide you through the process while maintaining your confidentiality and anonymity at each step. Follow these steps to submit your report:

1. Enter the name of the organization for which you are submitting a report and select the correct option
2. Click on the Violation Category that best describes the issue you are reporting
3. Agree to the "Terms and Conditions" then complete the form
4. Before submitting your report, create a password to follow-up on your report.

After submitting your report, you'll be assigned a report key. Your password and report key allow you to follow-up on your report.

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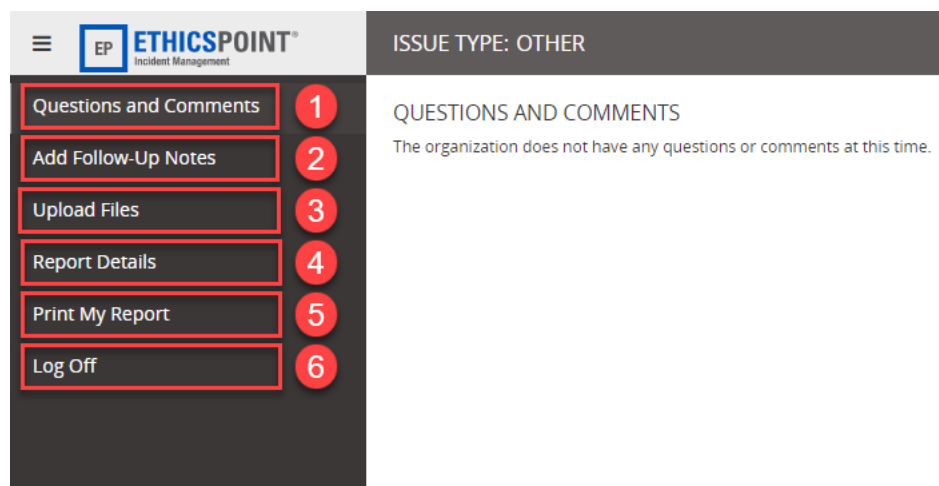
SAS70 Type II Certified

PRIVACY FEEDBACK

Powered by TRUSTe

**Step 17:**

This view allows you to view your current complaint. Place the mouse pointer in boxes 1 - 6 to obtain or provide further information.



- **Area 1:** Since you have just sent your complaint, Novartis has no open questions or comments at this time.
- **Area 2:** Here you can add and send additional notes to your complaint.
- **Area 3:** Here you can add and send more files to your complaint.
- **Area 4:** Here you can view the main contents of your complaint.
- **Area 5:** Here you can access the main contents of your complaint and print it out via your internet browser.
- **Area 6:** Here you can log out of the current view.

## 2.3 Follow-up of complaint in the further course of processing

### Step 18

Depending on whether you have decided in Step 11 / Area 4 to make your complaint anonymously or with your name and email address, you will receive an English-language email with the corresponding report number (Area 1) to your personal email address approx. three days after dispatch, depending on the scope of the complaint. Place the mouse pointer in Area 2 and press the left mouse button.

**NOTE:** If you have decided in Step 11 / Area 4 to make your complaint anonymously **without** stating your name and email address, please go to Step 22 approx. three days after sending your complaint, as you will not receive the email shown here and can only actively check the processing status of your complaint yourself.

This Message is from an External Sender. Do not click links or open attachments unless you trust the sender.

\*\*\*THIS IS AN AUTOMATED MESSAGE FROM ETHICSPPOINT DISPATCH - PLEASE DO NOT REPLY\*\*\*

John Doe

Novartis International demo has submitted an update to the report you submitted with the report key: XXXXXXXXXXXXXXXX

You should proceed to

[Redacted URL] and enter your report key and password.

This is a system-generated email. If you would like to be unsubscribed, please contact your administrator.

NAVEX reference: [Redacted]

\*\*\*\*\* CONFIDENTIALITY NOTICE \*\*\*\*\* This e-mail and any attachments may contain private, confidential, and privileged information for the sole use of the intended recipient. If you are not the intended recipient, any dissemination, distribution or copying is strictly prohibited. If you think that you have received this e-mail message in error, please contact the sender at NAVEX, keep the contents confidential and immediately delete the message and any attachments from your system.  
\*\*\*\*\*

### Step 19:

Place the mouse pointer in Area 1 and press the left mouse button to then select English as the display language in Area 2.

The screenshot shows the NAVEX EthicsPoint interface. At the top, there is a language selection bar with a red box labeled '1' around it. Below this, the main content area is titled 'File a New Report via EthicsPoint®'. It features a form with a text input field labeled 'Enter Organization Name' and a 'Submit' button. To the right of the form, there is a large list of languages. A red box labeled '2' highlights the 'English (UK)' option in this list. Below the language list, there is a section titled 'Providing anonymous, confidential hotlines for organizations worldwide.' followed by a paragraph explaining NAVEX's goal. Below this, there is a section titled 'We strive to make reporting issues and concerns via EthicsPoint® as straightforward and uncomplicated as possible. The following web pages will guide you through the process while maintaining your confidentiality and anonymity at each step. Follow these steps to submit your report:' followed by a numbered list of four steps. Below the list, there is a paragraph stating 'After submitting your report, you'll be assigned a report key. Your password and report key allow you to follow-up on your report.' At the bottom of the page, there is a footer with the NAVEX logo, links to 'Privacy Statement', 'Terms of Use', and 'Cookie Statement', and a 'SAS70 Type II Certified' badge.

NAVEX™

File a New Report via EthicsPoint®

Enter Organization Name

Submit

Providing anonymous, confidential hotlines for organizations worldwide.

NAVEX's goal is to ensure that you can communicate issues and concerns associated with unethical or illegal activities safely and honestly with an organization's management or the board of directors while maintaining your anonymity and confidentiality.

We strive to make reporting issues and concerns via EthicsPoint® as straightforward and uncomplicated as possible. The following web pages will guide you through the process while maintaining your confidentiality and anonymity at each step. Follow these steps to submit your report:

1. Enter the name of the organization for which you are submitting a report and select the correct option
2. Click on the Violation Category that best describes the issue you are reporting
3. Agree to the "Terms and Conditions" then complete the form
4. Before submitting your report, create a password to follow-up on your report.

After submitting your report, you'll be assigned a report key. Your password and report key allow you to follow-up on your report.

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**Step 20:**

In Area 1, enter your individual report key and the password you've assigned in Step 14 / Area 6 in the fields provided. Place the mouse pointer on the "Submit" field and press the left mouse button.

NAVEX

Client Login

**File a New Report via EthicsPoint®**

Enter Organization Name

Submit

**Follow-up on an Existing Report** 1

Report Key

XXXXXXXXXXXX

Password

XXXXXXXXXXXX

Submit

Providing anonymous, confidential hotlines for organizations worldwide.

NAVEX's goal is to ensure that you can communicate issues and concerns associated with unethical or illegal activities safely and honestly with an organization's management or the board of directors while maintaining your anonymity and confidentiality.

We strive to make reporting issues and concerns via EthicsPoint® as straightforward and uncomplicated as possible. The following web pages will guide you through the process while maintaining your confidentiality and anonymity at each step. Follow these steps to submit your report:

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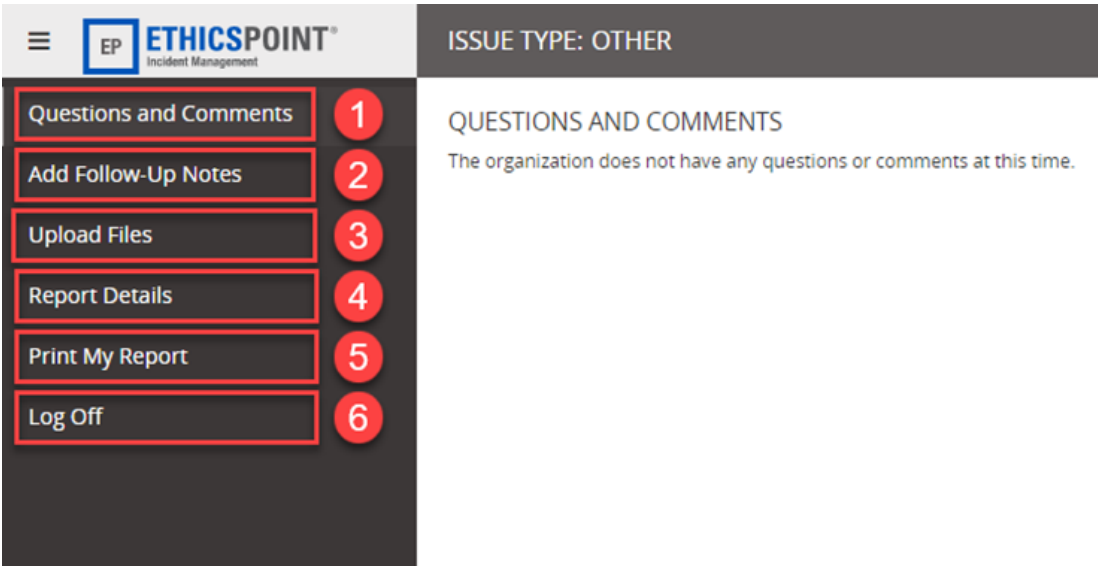
PRIVACY FEEDBACK

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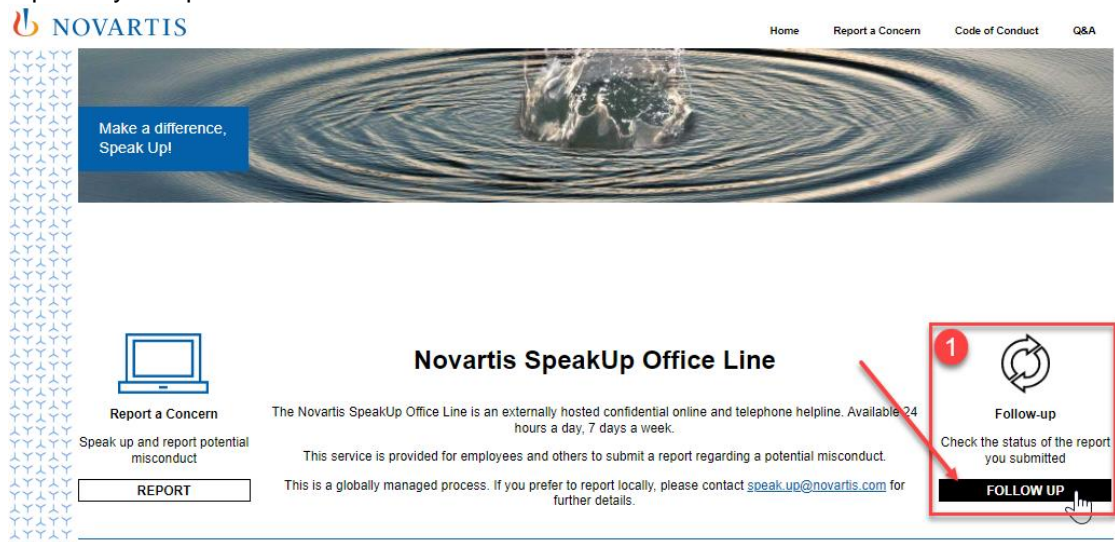
**Step 21:**

In section 1 you will be able to view comments, questions and assessment results from Novartis regarding your complaint. In addition, you can answer questions in Area 2 and 3 and make comments and send them to us.



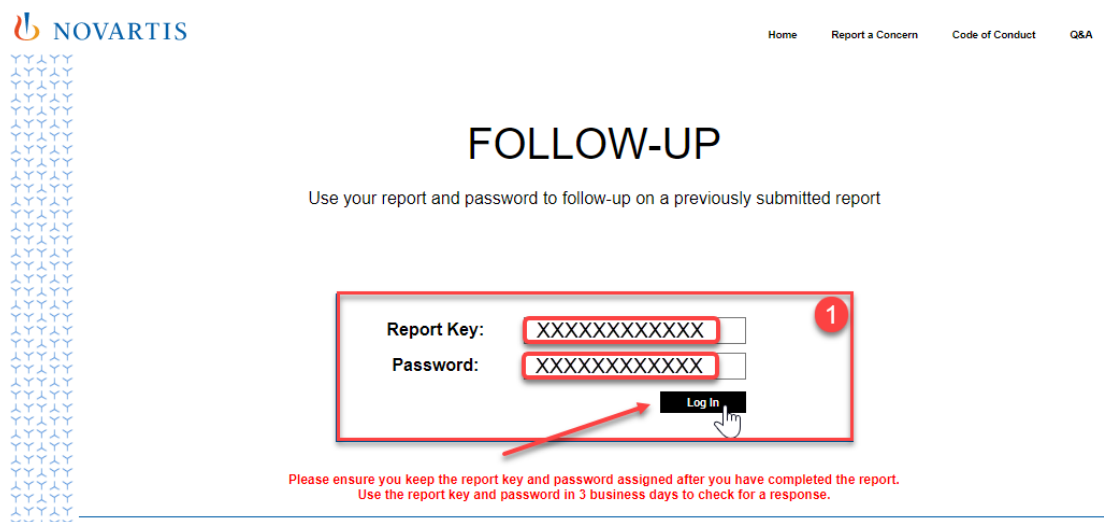
### Step 22:

Please start checking the current processing status about three days after you've sent your complaint. To do this, call up the electronic complaints procedure (Novartis SpeakUp Officeline) via the following [link](#) or the link provided on the website: [link to the complaints system \(SpeakUp\)](#). Place the mouse pointer in Area 1 and press the left mouse button to enter your report key and password.



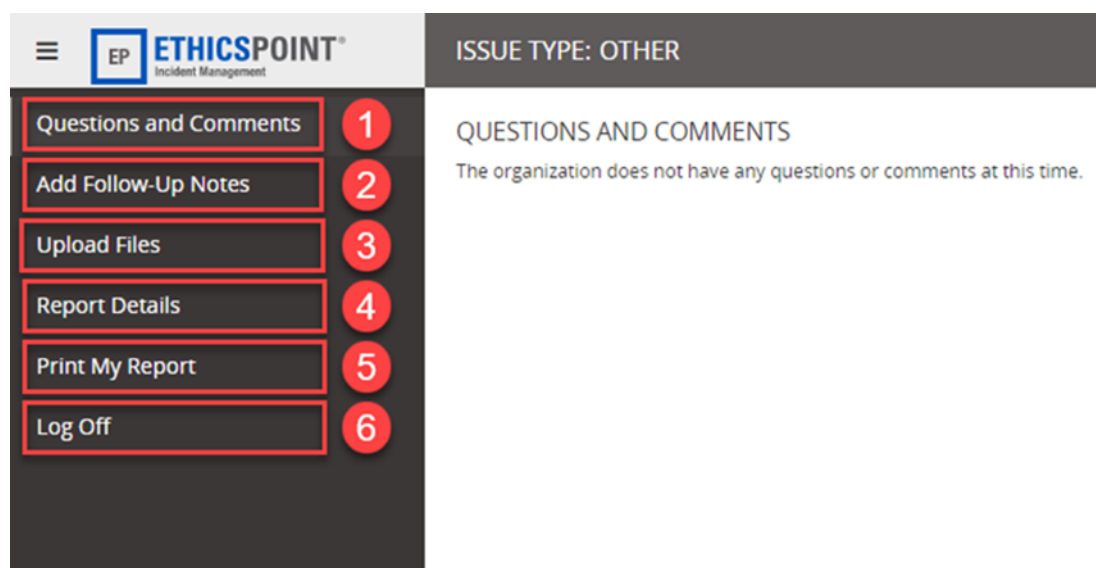
### Step 23:

In Area 1, enter your individual report key and the password you've assigned in Step 14 / Area 6 in the fields provided. Place the mouse pointer on the "LogIn" field and press the left mouse button.



**Step 24:**

This view allows you to view your current complaint. Place the mouse pointer in boxes 1 - 6 to obtain or provide information.



- **Area 1:** Novartis communicates open questions, comments and the results of the complaint investigation to you here.
- **Area 2:** Here you can add further notes to your complaint or answer and send the questions asked to you in section 1.
- **Area 3:** Here you can add additional files to your complaint or add and send additional files to the questions asked to you in Area 1 to answer the questions.
- **Area 4:** Here you can view the main contents of your complaint.
- **Area 5:** Here you can access the main contents of your complaint and print it out via your internet browser.
- **Area 6:** Here you log out of the current view.

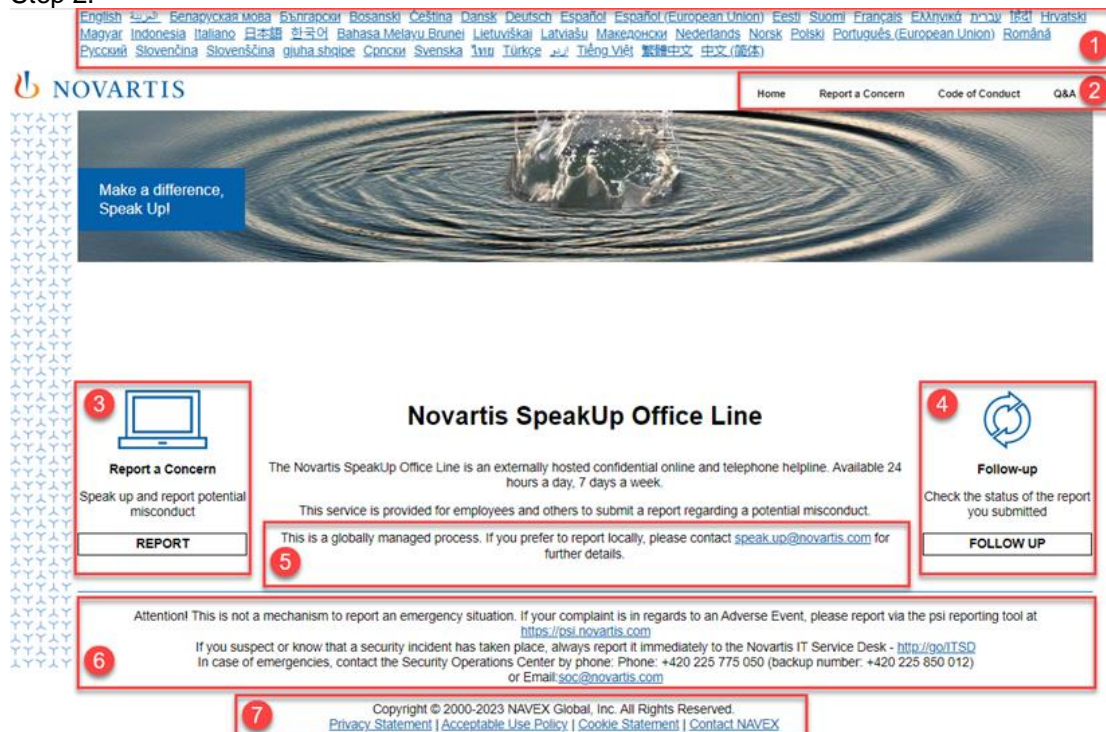
**NOTE:** The repetition of steps 22 – 24 should result in a dialogue between you as the complainant and Novartis, from information about case-related remedies, future prevention and other measures to the final conclusion of the complaint case.

### 3. Step-by-step instructions (telephone complaint)

#### 3.1 Conducting a telephone complaint

##### Step 1:

Call up the electronic complaints procedure (Novartis SpeakUp Officeline) via the following [link](#) or the link provided on the website; [link to the complaints system \(SpeakUp\)](#) and continue to Step 2.

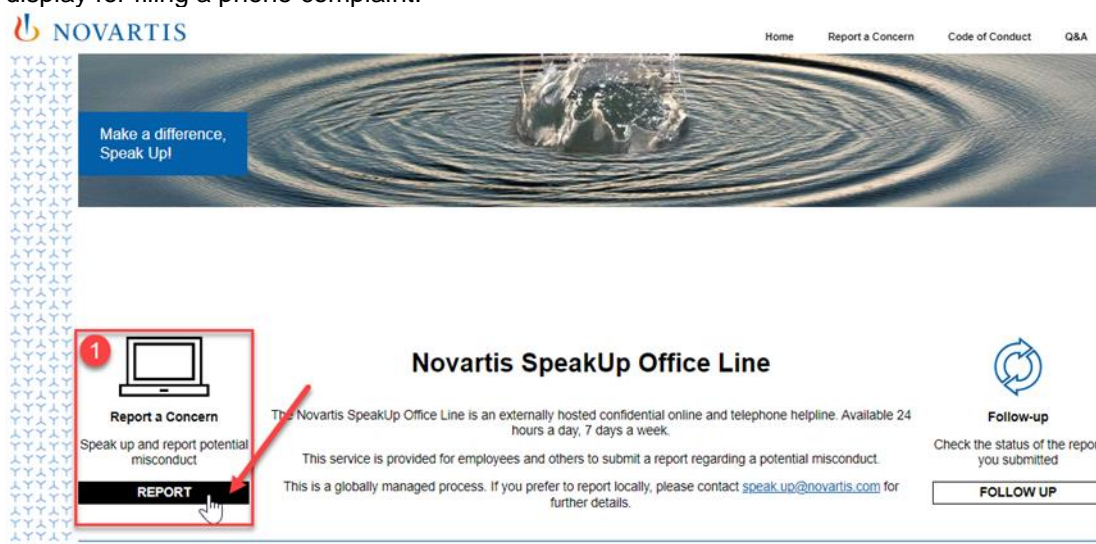


##### Brief overview of the different areas in the entry screen:

- **Area 1:** The language displayed in the electronic complaints procedure (Novartis SpeakUp Officeline) can be changed here. Please note that the description given here is currently available in English and German, only.
- **Area 2:** Link to further information in English or German. “Report a Concern” leads directly to the view described in Chapter 2 and 3 in Step 3 respectively.
- **Area 3:** See Step 2 in this Chapter.
- **Area 4:** See Step 22 in Chapter 2.3 “Follow-up of the complaint in further course of processing”.
- **Area 5:** Please **do not** use this e-mail address to make complaints regarding German Supply-Chain-Due-Diligence Act (SCDDA), use the online or telephone complaint process described in Chapter 2 or 3 here, only. Contact [speak.up@novartis.com](mailto:speak.up@novartis.com) (see Chapter 4) only with questions that go beyond the contents of this document.
- **Area 6:** Reference to reporting channels for other types of reports, such as adverse events report for Novartis or Sandoz medicines or security incidents. Please **do not** use these email addresses to make complaints regarding the German Supply-Chain-Due-Diligence Act (SCDDA).
- **Area 7:** General information from the software tool operator NAVEX.

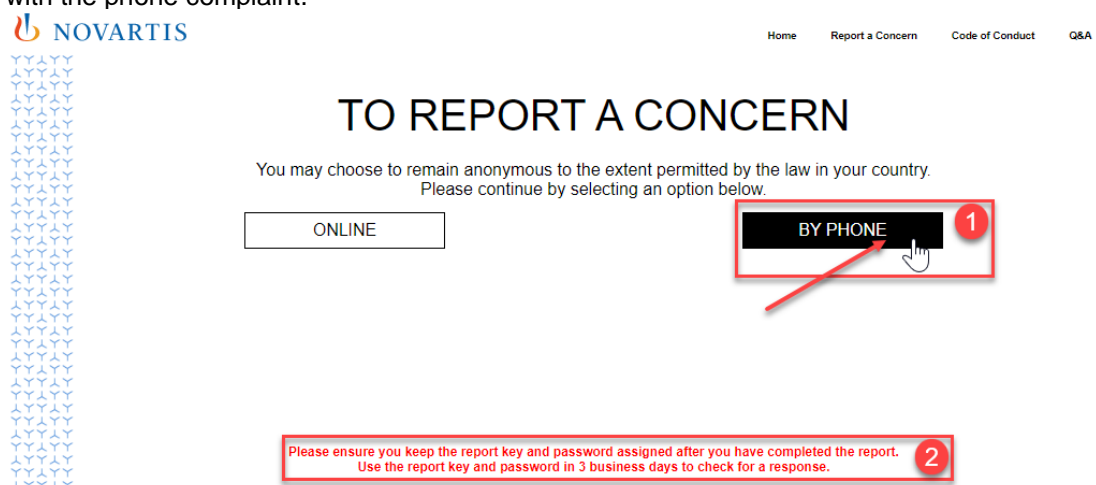
## Step 2:

Place the mouse pointer in the highlighted Area 1 and press the left mouse button to go to the display for filing a phone complaint.



## Step 3:

Place the mouse pointer in the highlighted Area 1 and press the left mouse button to continue with the phone complaint.



**Area 2:** Please note the information highlighted in Area 2. At a later stage in the process outlined here, you will receive a report key and password that you must write down and carefully keep, to view the future processing status of your complaint!

#### Step 4:

Place the mouse pointer in the highlighted Area 1 and press the left mouse button. Then select the country in which you are located in Area 2 (e.g. Germany).



[Home](#) [Report a Concern](#) [Code of Conduct](#) [Q&A](#)

## TO REPORT A CONCERN

You may choose to remain anonymous to the extent permitted by the law in your country.  
Please continue by selecting an option below.

ONLINE

BY PHONE

Select the country / region which you are located.

- Select -

Gabon

Gambia (the)

Georgia

Germany

Ghana

Gibraltar

Greece

Greenland

Grenada

Guadeloupe

Guam

Guatemala

Guernsey

Guinea

Guinea-Bissau

Guyana

Haiti

Heard Island and McDonald Islands

Honduras

Hong Kong

Please ensure you keep the report key and password assigned after you have completed the report.  
Use the report key and password in 3 business days to check for a response.

Attention! This is not a mechanism to report an emergency situation. If your complaint is in r  
<https://psi.novartis.com>  
If you suspect or know that a security incident has taken place, always report it if  
In case of emergencies, contact the Security Operations Center by phone: Phon  
or Email: [soc@novartis.com](mailto:soc@novartis.com)

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#### Step 5:

Depending on which country you selected in Step 4, a toll-free phone number will be displayed in Area 1 (e.g. for Germany 0800-1800042).

**NOTE:** Please note that the phone number is currently only accessible via landline and not via mobile networks.



[Home](#) [Report a Concern](#) [Code of Conduct](#) [Q&A](#)

## TO REPORT A CONCERN

You may choose to remain anonymous to the extent permitted by the law in your country.  
Please continue by selecting an option below.

ONLINE

BY PHONE

Select the country / region which you are located.

Germany

### International Toll-Free Service (ITFS)

From an outside line dial the ITFS number for your location:  
Germany .....0800-1800042

Please ensure you keep the report key and password assigned after you have completed the report.  
Use the report key and password in 3 business days to check for a response.



**Step 6:**

You can currently address complaints in German (telephone button 1) or in English (telephone button 2) to Novartis.

**Step 7:**

- a. With the **telephone button 1**, you can address a new complaint directly in a personal, **confidential conversation** with Novartis. During the telephone conversation lasting approximately 10-15 minutes, you will be asked about various points and follow-up questions will be asked to provide more specific information about the complaint. Your descriptions will be documented in a report to Novartis. You will then receive an individual report and at least a 4-digit PIN code (password) to request further information on the status of your complaint by telephone in the future. This procedure enables you to retrieve your complaint case online or to provide further information on the respective complaint case.
- b. Use the **telephone button 2** to request information about an existing complaint case. The prerequisite for querying that information is the individual report and at least a 4-digit PIN code (password) you have received in Step 7 / a).
- c. You can listen to detailed explanations of the process described here by pressing **telephone button 3**. After listening you will be connected to a contact person to address a complaint in a personal, confidential conversation with Novartis, if this is desired.

**NOTE:** For the sake of simplicity, during the telephone complaint process the expressions “your organisation” / “at work” will be used, implying that a Novartis or Sandoz employee is the addressee of the explanations. Nevertheless, all non-Novartis employees and thus all Novartis external persons can also use the telephone complaint process described here under the same conditions (e.g. optional anonymity, confidentiality, etc.).

## 3.2 Telephone follow-up of complaint in further course of processing

### Step 8:

Call 0800-1800042 using the process shown in Steps 1 – 5.

### Step 9:

Use the **telephone button 2** to request information and the current status of an existing complaint. To request information, you must specify the individual report and provide a PIN (password) of at least 4 digits.

**NOTE:** Depending on the scope, it will take approximately three working days to process your complaint. Please start to check at regular intervals after approx. three working days whether Novartis has further questions for you with regard to your complaint or what the processing status of your complaint looks like. The repetition of steps 8 – 9 should result in a dialogue between you as the complainant and Novartis, from information about case-related remedies, future prevention and other measures to the final conclusion of the complaint case.

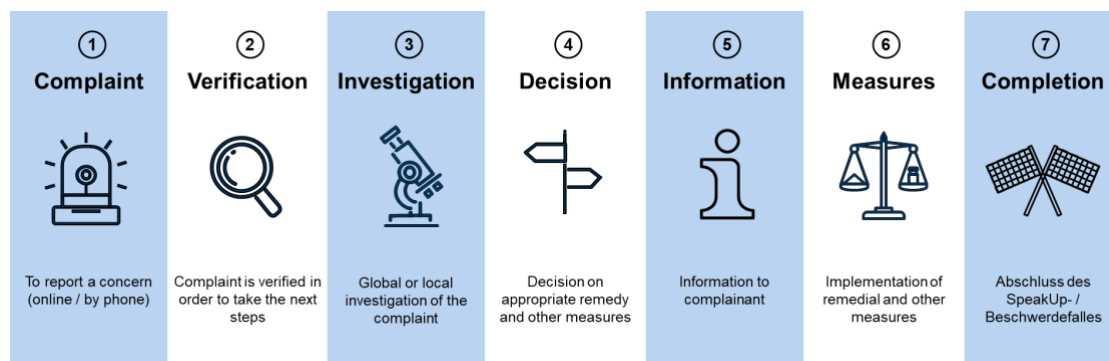
## 3.3 Online follow-up of telephone complaint in further course of processing

A complaint submitted by telephone can also be viewed and processed online by you as the complainant in the further course of processing. Please follow the instructions provided in Section 2.3 “Follow-up of the complaint in the further processing process” in steps 22 – 24.

**NOTE:** The repetition of steps 22 – 24 should result in a dialogue between you as the complainant and Novartis, from information about case-related remedies, future prevention and other measures to the final conclusion of the complaint case.

## 4. Complaint handling process

The illustration shows the general processing process of your complaint about risks or injuries under human law or environmental law in the business area of Novartis or Sandoz itself and in the area of the supply chain (direct and indirect suppliers), from receipt by us to completion.



- 1. Complaint:** Employees of Novartis or Sandoz and all external persons can report the above-mentioned complaints online or by telephone to Novartis or Address Sandoz.
- 2. Review:** After the complaint has been submitted, the content and completeness of the complaint will be reviewed, and any queries will be raised. Depending on the scope, the initial processing of the complaint will take approx. three working days.
- 3. Investigation:** Depending on the potential scope of a complaint for Novartis, a case study of the complaint is planned at global or national level. In the event of a complaint concerning the German Supply Chain Due Diligence Act, Novartis Germany will be involved at least for information purposes.
- 4. Decision:** On the basis of steps 1 – 3, a decision will be reached on case-related remedies, future prevention and other measures.
- 5. Information:** In order to maintain dialogue with the complainant, the complainant is involved in the information cycle.
- 6. Measures:** The case-related remedies, future prevention and other measures decided in Step 4 will be implemented in accordance with the provisions contained in the Supply Chain Due Diligence Act.
- 7. Conclusion:** The SpeakUp/Complaint case is concluded and is included in the corresponding reporting in accordance with the provisions contained in the Supply Chain Due Diligence Act.

If you have any further questions about the complaint process, please contact [speak.up@novartis.com](mailto:speak.up@novartis.com).