

## **Strategic projects and initiatives** <sup>[1]</sup>

We are implementing several projects across our five strategic human rights priorities.

### **Embedding human rights into policies**

In line with the UN Guiding Principles on Business and Human Rights, Novartis is embedding human rights in our business in several ways:

- **Novartis Third Party Code:** Human rights is now a central element of our Novartis Third Party Code revised in 2020. The code encourages third parties to implement the UN Guiding Principles and contains important requirements regarding overtime hours, pay, and respect for community rights.
- **Diversity & Inclusion:** We are working with our Diversity & Inclusion team to review policies affecting LGBTQI+ associates, with the objective to identify and close gaps from a human rights standpoint.
- **Disability inclusion:** We are supporting the development of the first Novartis global strategy on disability inclusion to ensure a human rights based approach guides the design and implementation of this strategy (i.e. engaging with rights-holders throughout the process, viewing risk from a rights-holder perspective, addressing all forms of disability).

### **Training and capacity building**

We continue to develop and roll out training on human rights for associates. We work with associates who are confronted with our most important issues to develop the content of our training modules. Highlights include:

- **Labor rights:** We delivered a workshop for our global Third Party Labor Rights managers to explain the four core ILO labor rights and how they apply to our business.
- **Human rights ambassador network:** We established this network within the Ethics, Risk, and Compliance (ERC) function to build capacity among associates across markets on issue identification and analysis from a human rights perspective.
- **Modern slavery:** We developed an online training for procurement, ERC, and associates in the UK and Australia (where modern slavery reporting is legally required).

### **Human rights due diligence and assessments**

Since 2017, we have completed eight market assessments which have led to the identification of high priority human rights issues across the business. We also started to conduct narrower

product and service assessments covering raw material inputs into our products, clinical trial policies and processes, and our central employee grievance mechanism.

Our 2018 assessments revealed the need to help put formal grievance mechanisms and processes in place for communities living close to our manufacturing operations. With this in mind, we have conducted a gap analysis of our Group-wide grievance system against the effectiveness criteria of the UN Guiding Principles on Business and Human Rights.

In 2019, we redesigned our human rights assessment program to include direct engagement with suppliers, communities and civil society actors. For instance, our assessments in India, Singapore, Brazil and China included supplier site visits as well as interviews with communities surrounding our or our suppliers' operations, and relevant nongovernmental organizations.

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#### **Links**

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