

## **Ethics, Risk and Compliance** <sup>[1]</sup>

### **Building a culture of integrity**

We aspire, as part of our vision, to be a trusted leader in changing the practice of medicine. To realize this vision, we need to earn and maintain the trust of patients, associates, healthcare partners, shareholders and the society we serve.

We recognize society's expectations of our industry and of Novartis, and that we must go beyond just doing what is legal in order to meet legitimate expectations of society.

Our aim is to prevent issues from occurring, drive personal accountability for behaviors, and generate learnings that can be applied across the organization.

In 2014, we created the position of Chief Ethics and Compliance Officer, reporting to the CEO, elevating the Compliance function to the highest levels in the company. On April 1, 2018, the role was expanded to include oversight of our risk management functions. The new role of Chief Ethics, Risk and Compliance Officer was further elevated to become a member of the Executive Committee of Novartis.

We do not tolerate unethical behavior by our associates anywhere, and we will take all necessary steps to ensure compliance with our Code of Conduct and all applicable laws. At the same time, with more than 120 000 associates, we cannot exclude the possibility of misconduct by individuals. We therefore have extensive measures in place in an effort to ensure that reports of suspected misconduct are investigated thoroughly. Where misconduct is found, we work to take swift and appropriate action.

With a goal of ensuring accountability of local country organizations, our management includes integrity and compliance questions as part of standard business reviews. We work to identify and mitigate risk exposure proactively so it can be reviewed and discussed at a management level.

Our goal is to maintain consistent standards of business practices across Novartis, ultimately enabling us to provide the best possible care for patients globally.

The Global Ethics, Risk & Compliance function designs and implements compliance programs associated with the [Novartis Code of Conduct \(PDF 6.2 MB\)](#) <sup>[2]</sup>, [Anti-Bribery Policy \(PDF 0.4 MB\)](#) <sup>[3]</sup>, [Professional Practices Policy \(P3\) \(PDF 0.8 MB\)](#) <sup>[4]</sup>, and [Conflicts of Interest Policy \(PDF 0.5 MB\)](#) <sup>[5]</sup>. Each Novartis division and Group function has a Global Integrity & Compliance Officer who drives the implementation of these programs, with the goal of ensuring ethical business practices by all associates.

## **Links**

- [1] <https://www.novartis.com/our-company/corporate-responsibility/ethics-risk-compliance>
- [2] <https://www.novartis.com/sites/www.novartis.com/files/code-of-conduct-english.pdf>
- [3] <https://www.novartis.com/sites/www.novartis.com/files/anti-bribery-policy-en.pdf>
- [4] <https://www.novartis.com/sites/www.novartis.com/files/p3-professional-practices-policy.pdf>
- [5] [https://www.novartis.com/sites/www.novartis.com/files/Conflict\\_of\\_Interest\\_Policy\\_Final\\_en.pdf](https://www.novartis.com/sites/www.novartis.com/files/Conflict_of_Interest_Policy_Final_en.pdf)