

Code of Ethics ^[1]

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.

Handling complaints

At Novartis, everyone is required to report Code of Ethics violations. The SpeakUp Office (formerly named Business Practices Office) offers employees and people outside of Novartis a channel through which to report misconduct.

The SpeakUp Office helps Novartis act with the highest ethical standards in the following ways:

- Empowering associates to speak up without fear
- Treating those that trust us with their concerns with respect, fairness, confidentiality and protection against retaliation
- Establishing the facts and trying to understand the truth with a sense of urgency
- Ensuring fair and consistent remedial actions
- Providing feedback to those courageous enough to raise concerns

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](#) ^[2]

Any complaints concerning conduct of Novartis employees can be made directly to the SpeakUp Office through a web-based platform (webform or phone).

Novartis associates can either directly report the alleged misconduct to the SpeakUp Office, or through any of the contact options listed below.

- Any manager
- Any member of the People & Organization Function
- The Country President
- Any member of the Legal Function
- Any member of the Ethics, Risk & Compliance Function
- Any member of Global Security

Reports of alleged misconduct can be made anonymously, however, anonymity may limit the ability to fully and thoroughly investigate a claim. If you have questions about how and when to report, please contact speakup@novartis.com [3].

For Novartis associates using mobile devices, a SpeakUp app is available on the Novartis app store allowing easy web-based reporting.

What happens when you



Related links:

- [The Novartis Code of Ethics \(PDF 4.1 MB\)](#) [4]
- [Other policies and guidelines](#) [5]

We are committed to the use of the Novartis Code of Conduct and Corporate Citizenship Guidelines to foster a culture of integrity.

Footnotes:

References:

* [Webform or phone](#) [2] or via local channels (your manager, ERC, P&O, Legal, Global

Security functions, Country President)

Source URL: <https://www.novartis.com/our-company/corporate-responsibility/ethics-risk-compliance/code-of-ethics>

Links

[1] <https://www.novartis.com/our-company/corporate-responsibility/ethics-risk-compliance/code-of-ethics>

[2] <https://secure.ethicspoint.eu/domain/media/en/gui/100412/index.html>

[3] <mailto:speakup@novartis.com>

[4] <https://www.novartis.com/sites/www.novartis.com/files/code-of-ethics-english.pdf>

[5] <https://www.novartis.com/our-company/corporate-responsibility/reporting-disclosure/codes-policies-guidelines>