

Health, Safety & Environment Policy

Novartis Global Policy

Version: 5.0

This document was adopted by the Directors of Novartis LLC on 09.09.2024 and Director of Novartis Pharma Services Inc. Podružnica v Sloveniji on 09.09.2024. This document shall come into effect on 09.09.2024.

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ERC Health, Safety & Environment

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Document History

Version	Changes
1.0	Initial Issue of Document
2.0	Update and expansion of core HSE principles in alignment with, and building upon, updated Code of Ethics
3.0	Periodic review, align to current requirements and format
4.0	Periodic review update
5.0	Update of P&O responsibilities on Mental Health and Wellbeing [4]

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1. Introduction

1.1. Purpose

Novartis is committed to Health, Safety & Environment (HSE). Everyone working for Novartis is expected to share this commitment by taking care of themselves, looking out for others, and protecting the environment.

This policy supports the Code of Ethics [1] with its commitment to occupational health, occupational safety and environment compliance, and the Novartis environmental sustainability commitments.

1.2. Scope and Applicability

1.2.1. Scope

The scope of this policy is global.

1.2.2. Applicability

This policy is applicable to all associates, contractors and third parties who do work on behalf of Novartis at all owned, leased, or rented workplaces where Novartis has operational responsibility (e.g., locations operated or controlled by a Novartis company, joint venture locations).

1.3. Roles and Responsibilities

Role	Responsibility
Associates	<ul style="list-style-type: none">• Awareness of and compliance with this policy.
Line Management	<ul style="list-style-type: none">• Accountable for HSE performance (including compliance, resourcing and controls) within their respective operations and locations.• Promotes awareness of this HSE policy and awareness of HSE risks in their area.• Escalates material breaches of compliance to appropriate leadership and Global HSE.
Operations HSE	<ul style="list-style-type: none">• Implements Novartis HSE Programs in all facilities and sets objectives, targets for operational performance.• Demonstrates leadership and champions company values in matters pertaining to HSE.
ERC HSE	<ul style="list-style-type: none">• Establishes and maintains overall HSE Governance process including controls, conformance reviews and compliance audits.• Owns and maintains HSE Documentation Framework.
People and Organization (P&O)	<ul style="list-style-type: none">• Provide guidance and support for Mental Health and Wellbeing [4] programs

2. Principles

Novartis is committed to the following principles, which are core to how HSE operates.

2.1. Protecting the health and safety of our associates by:

- Promoting and supporting the implementation of programs to maintain and improve the physical, mental health, and social well-being of our associates and contractors.
- Providing our associates, contractors and third parties with safe working conditions to protect them from potential health hazards and injuries.
- Completing risk assessments before conducting any potentially hazardous work. Appropriate protective measures must be taken as needed to ensure the work can be completed safely.

2.2. Complying with local laws and regulations, and conformance to internal requirements by:

- Establishing a Novartis HSE Management System and supporting documents and regularly conducting audits, reviews and self-inspections to ensure conformance to internal requirements, as well as compliance with applicable local laws and regulations.
- Complying with internal and external requirements as part of our culture. This is reinforced through communications and accountability mechanisms.
- Having a company culture in which protecting the health and safety of associates, contractors, neighbors, others, and the environment is considered a core value.
- Participating in industry networks to exchange best practices.

2.3. Protecting the environment by:

- Implementing and maintaining processes and procedures which ensure compliance with relevant environmental regulations, compliance obligations and internal requirements.
- Taking action in support of minimizing the environmental impact of our business and workplaces by working toward carbon neutrality.
- Supporting initiatives to reduce the carbon footprint, waste, energy, and water usage of our workplaces and within the supply chain.

2.4. Considering HSE implications in the development of products, processes, and technologies by:

- Ensuring that HSE considerations are integrated into product and process development, procurement, manufacturing, and capital investment projects at an early stage.
- Engaging in scientific peer review and considering the HSE and business benefits and risks of innovation in a structured, scientific, and transparent manner.
- Including green chemistry in product development processes and integrating sustainable packaging into packaging design processes as relevant to their job duties.

2.5. Building a network of responsible business partners by:

- Requiring Third-Party suppliers to meet the HSE requirements outlined in the Novartis Third-Party Code [2] and in our Third-Party Risk Management (TPRM) Guideline [3].
- Promoting good HSE management practices with our supply chain partners and working with them where appropriate.
- Requiring environmentally responsible suppliers, goods and services through our procurement processes.
- Engaging with suppliers that exceed legal compliance requirements and actively minimize the environmental impact of their activities.
- Prioritizing suppliers that drive environmental impact reduction and sustainability in the supplier selection criteria.
- Conducting audits of suppliers on a risk basis to ensure conformance with TPRM and good industry practice.

2.6. Driving continual improvement in our HSE management systems and performance by:

- Obtaining annual management endorsement of HSE objectives and targets with regular measurement of performance against these objectives and targets.
- Drawing lessons learned from incidents and events and implementing actions to prevent a reoccurrence, including for incidents and events from outside Novartis where appropriate.
- Ensuring HSE competence through appropriate recruitment, training and development.

2.7. Communicating transparently by:

- Sharing HSE results openly both through internal and external communication channels.
- Reporting our HSE performance consistently with international public reporting standards.
- Engaging proactively with internal and external stakeholders, including local communities, and obtaining feedback about HSE matters.

2.8. Engaging all associates to support HSE principles by:

- Understanding local HSE requirements, completing all assigned training, and following requirements.
- Reporting any HSE incidents/unsafe conditions.
- Working in a safe and compliant manner.
- Participating in relevant HSE hazard identification and risk assessment processes relevant to their job duties.
- Looking out for their colleagues and speaking up respectfully if they observe unsafe behaviors or conditions.
- Reporting HSE key performance indicators accurately.
- Taking early action if deviations occur.
- Work in an environmentally responsible manner to assist Novartis in achieving Environmental Sustainability targets.

3. Internal Controls

The internal controls for this document can be accessed at [go/controlregister](#).

4. Breach of this Policy

Breaches of this policy can result in remedial, corrective, or disciplinary actions up to and including termination of employment. Actual or suspected incidents of misconduct should be reported to the SpeakUp Office. Novartis guarantees non-retaliation and confidentiality, to the extent legally possible, for good-faith reports of such breaches.

5. Adaptations

There are no adaptations to this policy.

6. Exceptions

There are no exceptions to this policy.

7. Definitions

Term	Definition
HSE Management System	Collection of documents, including the HSE Policy, which describe minimum requirements for the effective governance of established processes and operational control to an appropriate risk level for significant hazards, aspects, risks and opportunities.

8. Abbreviations

Abbreviation	Description
ERC HSE	Ethics, Risk & Compliance Health, Safety & Environment
TPRM	Third Party Risk Management

9. References

Number	Reference
1	Code of Ethics
2	Novartis Third Party Code
3	Third-Party Risk Management Guideline
4	Mental Health and Wellbeing (go/wellbeing)