

Guideline on Non-Discrimination, Non-Harassment and Non-Retaliation

Objective and purpose

This guideline affirms our commitment to provide a work environment that is free from improper discriminatory practices, prohibited forms of harassment and inappropriate conduct of a harassing nature including sexual harassment. It also provides a brief overview of the Novartis' complaint procedure for employees who believe they have been subjected to or witnessed such harassment or discrimination and describes related non-retaliation protection.

The standards described in this guideline should be implemented group-wide and must be adapted according to local laws and regulations, where necessary. This guideline, and the standards described herein, will become applicable only upon local implementation, in compliance with all applicable national and local laws.

Detailed description

Novartis is committed to provide a work environment that is safe and conducive to good job performance.

Novartis does not tolerate discriminatory harassment or inappropriate conduct of a harassing nature directed against any individual on the basis of such factors / personal characteristics as nationality, gender, gender identity, gender expression, age, ethnicity, religion, sexual orientation, disability or any other legally protected status of an individual.

Specifically, Novartis prohibits harassing conduct directed at its employees and contractors from customers, including, but not limited to, physicians and their office staff, suppliers, contractors, vendors, or anyone with whom employees conduct business on behalf of Novartis.

This guideline governs all work locations and work-related events, including, but not limited to, business trips, customers' / vendors' offices and work-sponsored social events.

Examples of prohibited harassing conduct include, but are not limited to:

- making racial, ethnic, sexual, or otherwise discriminatory slurs, jokes, or epithets at work, whether on-site or off-site, or at work-sponsored events;
- sending or forwarding emails that contain racial, ethnic, or otherwise discriminatory slurs, jokes or epithets;
- displaying on walls, bulletin boards, or elsewhere on Company premises (whether within an employee's own workspace or not) or Company-owned vehicles, written or graphic material that denigrates or shows hostility or aversion toward a person or group because of any characteristic protected by law.

Examples of prohibited sexually harassing conduct include, but are not limited to the following examples:

- unwelcome intentional touching of another person or other unwanted intentional physical conduct;
- offensive or unwelcome sexual flirtations, advances or propositions;
- verbal abuse of a sexual nature and sexually oriented kidding, teasing or jokes;
- graphic verbal commentaries about an individual's body;
- electronic display (e-mail, text, or social media) or transmission of sexually suggestive material;
- sexually degrading words used to describe an individual;
- the display in the workplace or at a work-related office, facility or function, of sexually suggestive objects or pictures;
- offensive visual conduct such as leering or making sexual gestures;
- downloading, transmission and/or possession at work of sexually explicit materials from the Internet or any other source;
- Inquiries into another's sexual experiences and activities or discussion of one's own sexual experiences and activities;
- sexual favoritism which includes a supervisor or manager making decisions based upon an employee's receptiveness to sexual advances.

(Note: Locally relevant examples, according to local laws and regulations, should be included for local implementation.)

Additionally, in all aspects of employment, such as recruitment, performance appraisals, compensation and benefits, training and development, promotion, transfer and termination, Novartis will treat employees in a non-discriminatory manner; accordingly, making decisions without regard to such factors as: nationality, gender, gender identity, gender expression, age, ethnicity, religion, sexual orientation, disability or any other legally protected status of an individual.

Reporting Misconduct (including Harassment, Discrimination, Retaliation)

All Novartis associates are required to report harassment or discrimination to the Speak Up Office or respective local functions, such as P&O or Management.

Any employee who experienced, has witnessed or has otherwise become aware of suspected harassment or discrimination, must immediately report the incident either to the Speak Up Office or to the local management functions (P&O, Management). Complaints received by the Speak Up Office or the local functions (P&O, Management) will be reviewed accordingly and processed as described in the Misconduct Reporting and Speak Up Process Guideline.

Every complaint is taken seriously. Allegations not made in good faith, e.g. with malicious intent to harm another associate, will be considered as misconduct and will not be tolerated.

Protection from Retaliation

All Novartis associates who report misconduct (including Harassment, Discrimination, Retaliation) are protected against retaliatory actions.

Novartis prohibits retaliation through intimidation, coercion, or any other form of adverse employment action, for making a good-faith report of sexual or other prohibited discrimination or harassment, for participating in the investigation of any such complaint, or filing a complaint with a regulatory agency. Examples of retaliation include, but are not limited to:

- termination of employment;
- demotion;
- negative performance review;
- unfavorable assignments.

Any employee who believes he/she is being retaliated against, or has witnessed or otherwise become aware of suspected retaliation, must immediately report the incident to SpeakUp Office.

Sanctions and remedial actions

Sanctions and remedial actions should be taken and be documented in line with local laws and regulations.

Appropriate sanctions and/or remedial actions will be taken by the business, for substantiated instances of misconduct, including substantiated instances of harassment, discrimination and retaliation. Please refer to Misconduct Reporting and Speak Up Process Guideline.

Sanctions and remedial actions should be documented in the employee's personnel file in accordance with local laws and regulations. The respective manager, together with the P&O Partner should also ensure that the disciplinary action is reflected in the performance management process as may be appropriate.

These documents should be maintained, as per local records retention process requirements, taking into consideration legal requirements such as data privacy and confidentiality requirements.