NOVARTIS

# Ethical Behavior

Our aim is to prevent issues from occurring, drive personal accountability for behaviors, and generate learnings that can be applied across the organization. In addition, we maintain a strong commitment to upholding human rights and managing risk in our supply chain. We began this journey some years ago, and we continue to make progress. To further reinforce principles-based thinking and ethical decision-making in our organization and interactions with external stakeholders, we have developed a Novartis Code of Ethics. Rooted in behavioral science, the code as co-created by Novartis associates and launched in 2020.

At Novartis, we hold ourselves to high ethical standards and do not tolerate unethical behavior. We are taking all necessary steps to enable associates to do what's right and ensure compliance with our Code of Ethics and all applicable laws. At the same time, with more than 110 000 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. In addition, our SpeakUp Office provides a safe place where anyone, internal and external, can raise concerns about unethical behavior at Novartis.

## Code of Ethics

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.

## SpeakUp

The SpeakUp Office helps Novartis act with the highest ethical standards.

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