NOVARTIS

SpeakUp

Novartis Misconduct Reporting Mechanism

The Novartis SpeakUp mechanism is for anyone - from Novartis associates, to business partners (e.g., suppliers), patients and beyond – to report concerns of misconduct related to Novartis. All concerns are handled by a dedicated team of professionals, and we protect everyone speaking up in good faith. Misconduct is conduct that is potentially illegal, violates the Novartis Code of Ethics or other applicable company policies, or falls outside of what is considered proper for a person, a profession, or an industry, typically taken with the aim to purposely circumvent rules, in order to obtain possible personal or company benefit. If you become aware of misconduct, we want to hear about it.

We report on complaints received and substantiated in our Novartis in Society Integrated Report.

Report a misconduct concern now

Join the people who have the courage to speak up and help make a difference.

Report a misconduct concern

SpeakUp FAQs - Speaking up is important

You are not alone. Your voice makes a difference.

Why does Novartis have a SpeakUp mechanism?

At Novartis, we are committed to fostering a culture of integrity and individual accountability. This environment helps preserve and maintain the trust and support of our patients, associates, shareholders, healthcare partners, and society-at-large. The Novartis SpeakUp mechanism is a safe place for anyone (including employees, business partners, customers, and others) to speak up about concerns of actual or suspected misconduct, to get support and do the right thing.

It reflects our commitment to ethical conduct as set out in our Code of Ethics (CoE) (PDF 6.6 MB), Novartis Third-Party Code (NTPC) (PDF 0.4 MB), Human Rights Commitment Statement (HRCS) (PDF 0.3 MB) and other applicable company policies, as well as of laws or regulations, applicable to Novartis.

Who can use the SpeakUp mechanism?

Anyone can raise a concern related to Novartis business activities. This includes Novartis associates, business partners (e.g., suppliers), patients and beyond. All concerns are managed by a dedicated team of professionals and are taken seriously. Concerns are handled confidentially and objectively, with respect and managed to Novartis high ethical standards.

What are the several ways I can SpeakUp?

You can speak up through multiple channels:

Complaints can be made centrally to the SpeakUp Office through a web-based platform (webform or phone) accessible by clicking the above “Report a misconduct concern” button, or to any of the alternative reporting channels listed below. The telephone and web portal are an independent external service available 24 hours a day, 7 days a week and in 37 languages. Reports of alleged misconduct can be made anonymously, however, anonymity may limit the ability to fully and thoroughly investigate a claim.

Alternative Novartis internal reporting options are to contact (locally or at Group level, as applicable):

- Any manager
- Any member of the P&O, Ethics, Risk & Compliance, Global Security and legal Function
- The Country President
- Other function as may be required under local country standards or regulations

External stakeholders with specific human rights related concerns may also contact thehuman rights team.

What types of concerns should I report?

We want to hear about reports of misconduct which is any conduct that is potentially illegal, violates the Novartis Code of Ethics or other applicable company policies, or falls outside of what is considered proper for a person, a profession, or an industry. This could be related to our Code of Ethics (CoE) (PDF 6.6 MB), Novartis Third-Party Code (NTPC) (PDF 0.4 MB), Human Rights Commitment Statement (HRCS) (PDF 0.3 MB) other company policies or applicable laws and regulations in our countries of operation. We at the SpeakUp Office are here to help you.

Activities we rely on you to report may include, but are not limited to:

- Books & Records, Accounting Irregularities
- Bribery & Kickbacks
- Company Confidential / Trade Secret Information
- Competition Matters
- Conflict of Interest
- Data Privacy
- Discrimination
- Doing Business Ethically
- Environmental Impacts
- Expense Fraud
- Fraud / Asset Misappropriation
- Health & Safety
- Human & Labor Rights
- IT
- Other Employee Relations Issues (e.g., inappropriate behavior, bullying etc.)
- Quality Assurance / Data Integrity
- Retaliation
- Sexual Harassment

Please note: The SpeakUp mechanism is not intended to resolve normal disagreements that occur in a routine workplace setting, e.g., disagreements related to job performance, pay increases, or decreases (unless it falls below a living wage in your local market).

Should I report adverse events or product quality to SpeakUp?

No, please visit Novartis PSI Report | Novartis.

Should I report emergencies to SpeakUp?

No, this is not intended for emergency use. If you are in need of emergency assistance you should notify your local emergency services.

Where should I go to if I have a question about Novartis?

Contacts | Novartis

For product-related inquiries and medical information about our products, please contact the Novartis office in your country.

What happens after I report a concern?

We follow a clear process to manage all cases raised and will keep you involved each step of the way.

1. Should you wish to access your case again, you will need to create login details by entering an email address and creating a password. You will still remain anonymous if you have chosen not to identify yourself. By creating a login you will be able to return to the case to submit more information, receive updates, communicate with the case manager or check progress.
2. A member of the Novartis SpeakUp team will contact you approximately three working days after you submit your case. Your concern will be managed by one of Novartis SpeakUp professionals, not the external firm hosting the site.
3. The SpeakUp team will evaluate and assess the information you provided to determine the appropriate course of action and will ensure that a thorough, fair, and impartial investigation or review of the reported concerns is conducted. This process takes anywhere between 10 to 45 days. Some cases may be resolved sooner, and others may take longer. You will be kept informed and supported throughout the process.
4. If you have additional information to provide related to your matter after you have filed the report, you can return to the system again either by internet or telephone and edit, amend, or add to your original report.

What if I do not have any evidence or proof but suspect that something is wrong?

Please register a concern with SpeakUp, even if you do not have all the evidence. If you see or hear something that seems wrong or if you are unsure about it, please report it.

Am I required to identify myself?

You are not required to identify yourself. We are committed to anonymous reporting and anonymity will be respected. However, you are encouraged to identify yourself, as an anonymous report may limit the ability to fully and thoroughly investigate a reported concern. If you choose to share your identity, we will treat it as confidential and will only share it with others as necessary for the purposes of the investigation.

Is the process confidential?

Yes, the process is confidential to Novartis, except in some rare cases where Novartis may be required by law to disclose certain information to government agencies or other law enforcement authorities, e.g., cases where immediate harm against another individual may be threatened.

What if my manager or other team members are involved? I am worried they will see the details of what I have reported.

Your case is confidential from the moment it enters the SpeakUp system. The details of your report are only accessible to the assigned Novartis case managers. Final report is never distributed to anybody not involved in the follow up of the matter.

What if my manager or another person retaliates against me for reporting a concern?

We have a strict internal Novartis policy prohibiting any form of retaliation. For more details on how you will be protected, please refer our Non-Retaliation Policy (PDF 0.3 MB) which explains how we address and protect those who raise concerns.

As enshrined in our Third-Party Code, we require third parties to enforce a non-retaliation policy that permits workers to express their concerns about the workplace without fear of retribution or losing their jobs. If you believe you have faced retaliation by a third party for speaking up, please let us know. Speaking up is always the right thing to do and we are here to support you, even after you have spoken up.

How quickly will my concern be managed?

Depending on the complexity and geographical location, most concerns will be assessed within a matter of weeks. However, all concerns are acknowledged within three business days.

What about my legal rights?

You are free to pursue your legal rights and access all available judicial mechanisms, in parallel with, or following Novartis considerations of your concern.

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