



Vilnius, Lithuania
24–26 May 2024



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Beatrice Baudino

Head Ethics, Risk & Compliance, Patient Engagement & Communications
Novartis International AG

At Novartis, our purpose is to reimagine medicine to improve and extend people's lives



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We are a focused medicines company

Our organization is made up of different units, functions, regions, countries, and sites who all contribute to this purpose and our strategy in unique ways.

Regardless of where we sit or what we do, our purpose unites us and makes us greater than the sum of our parts.

Our Code of Ethics signals our commitment to doing what's right, and was designed by our associates for our associates

Code of Ethics consists of **two** key elements:

1

Ethical principles define what 'doing what's right' means in the context of Novartis.

2

Clear statements on our commitment to do what's right across key areas nominated by our associates



Supported by:
an Ethical Decision-making Framework
and a suite of resources

Launched in **Jun 2020**
Effective as of **Sep 2020**

Our Code of Ethics
replaced our Code of Conduct

Anchored in behavioral science and created by our associates for our associates.



Our Ethics, Risk and Compliance (ERC) program covers ethics, enterprise risk and regulatory compliance



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1

Ethics



Build a sustainable foundation

We empower associates to do what's right so that every day our decisions benefit patients, society and Novartis.

2

Risk



Develop enterprise assurance standards

We establish effective risk management that identifies, analyses, and addresses risks that can affect our ability to operate.

3

Compliance



Manage our compliance risks

We ensure Novartis acts in compliance with applicable regulations, laws, policies and guidelines.

Our Doing Business Ethically policy & BeSure platform are designed to strengthen risk management



Success of the Doing Business Ethically program hinges on the implementation of three interdependent areas:

1. **Policy & system:** Foundation to help associates confidently navigate the process.
2. **Risk discussions:** Meaningful risk coaching, using the 4-step risk framework.
3. **Ethical Ecosystem:** An environment that supports ethical behaviour, safe discussions, sharing of lessons learnt, trusting relationships enabled by ethical leadership.

Doing Business Ethically policy addresses the risk of bribery and undue influence across the lifecycle of our products



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We do not tolerate any form of bribery or corruption

Bribery can take a variety of forms. Even common business practices or social activities, such as the provision of gifts and hospitality, can constitute bribes in some circumstances.



We will maintain high standards of ethical business conduct

We are accountable for our actions, decisions, and how we interact with our stakeholders. We adhere to all legal and regulatory requirements and comply with self-regulations established by our industry.

Our Interaction Types

Interactions with External Stakeholders may take various forms. We classify these interactions into the following three broad categories:

- 1 Engagement**
- 2 Funding & Collaboration**
- 3 Gifts, Samples, and other Items**