

Ethics, Risk and Compliance

Compliance Training Approach

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Purpose and scope

This document defines the global Ethics, Risk & Compliance (ERC) Training approach including:

1. Training guiding principles
2. Compliance training structure
3. Compliance training governance
4. Learning effectiveness evaluation
5. Externally reported training completions

Section 1: ERC training guiding principles



- 1. Make content relevant**
Risk-based content exploring real-life situations across the organization
- 2. Create a learning experience**
Consistent and interactive design to engage learners
- 3. Impact Novartis culture**
Fostering a culture of integrity and ethical decision-making
- 4. Respect employees' time**
Appropriate time investment for compliance training

Section 2: Compliance training structure

Novartis compliance trainings can be divided into:

Global Curriculum	Mandatory eTrainings for all employees and external contingent workers
Foundational trainings	New Hire Training* assigned to all news hires 4 weeks after employment date. Code of Ethics annual mandatory training.
Risk-based training	To select relevant training topics, the ERC Academy, Training and Enablement team conducts an annual curriculum risk analysis. This is a data-driven approach to select training topics which would apply to most Novartis employees and where education can mitigate enterprise-wide compliance risks.
Reinforcement	Communication and educational toolkits are provided for global and local use to reinforce ERC policy topics.
Local Training	Local in-depth and risk-based targeted trainings complementing global eTrainings
Targeted risk-based training	In countries, if/as applicable, targeted risk-based training is implemented to complement global eTrainings and ensure compliance with locally applicable regulations.
Reinforcement	Countries are encouraged to use locally any globally provided communication and educational material to reinforce ERC policy topics.
Leadership Training	Tailored management training
Executive Onboarding Program	Onboarding of newly appointed local executive leaders on ethical business practices and ethical achievement of business goals. Local ERC professionals are responsible for defining the training audience, delivering the sessions and monitoring completions. Sessions are delivered face to face or virtually.

* **Topics covered in the New Hire Training:** code of ethics, access to medicines, patient safety, culture and people experience, fair employment practices, health and safety, insider trading, external partner risk management, professional practices, conflicts of interest, financial integrity, anti-trust and fair competition, customs and trade compliance, human rights, environmental sustainability, data and technology, anti-corruption, misconduct reporting.

Section 3: Compliance training governance



3.1 Global compliance training curriculum

Since 2012, global mandatory compliance e-training to all employees has been successfully coordinated and aligned through our Global Compliance Training Curriculum process.

Multiple data sources are used to perform a data analysis of very high, high, and medium risks across our risk assessment framework results. Risks that can be mitigated through learning solutions are incorporated into the annual curriculum.

The global compliance training curriculum is designed to:

- Address any identified compliance enterprise-wide risks
- Foster awareness of policies, handbooks and guidelines within the organization
- Harmonize and align curricula between divisions and locations

3.2 The ERC compliance training process

This process outlines the framework and minimum training requirements for owned global policies, handbooks and guidelines. Audiences in scope are Novartis internal employees and third-party personnel.

In addition, it provides useful templates and resources to support the ERC function in developing local risk-based training plans.

Section 4: Learning effectiveness evaluation

Learning impact is measured through a defined and structured cycle.



- 1. Define learning objectives**
What is the learner expected to know-feel-do after the training?
- 2. Define data plan**
How do we measure that learning objectives were achieved?
- 3. Evaluate learning effectiveness**
Were learning objectives met?
- 4. Communicate and share results**
Share results with relevant stakeholders

Section 5: Compliance training completions

Annual Global e-Training completions reported externally include:

Global Code of Ethics Training

Scope: all Novartis Internal Employees and third-party personnel

Completion can be found at [ESG | Novartis](#) (Report on Non-Financial Matters)

Targeted Anti Bribery / Anti-Corruption Training

Scope: Internal Employees and third-party personnel performing high-risk roles in high-corruption countries.

Completion can be found at [ESG | Novartis](#) (ESG Data Summary)