

## Ethical behavior

Our aim is to prevent misconduct and reputational harm from occurring, drive personal accountability for behaviors, and generate learnings for every leader and employee in our company. We began this journey years ago, and we continue our efforts to reinforce integrity across our organization and foster a business culture in which ethics and compliance take center stage. The Novartis Code of Ethics signals our commitment to doing what's right and underpins everything that we do. Rooted in behavioral science, the Code is co-created by Novartis employees and was originally launched in 2020 and updated in 2024.

At Novartis, we hold ourselves to high ethical standards and do not tolerate unethical behavior. We are taking all necessary steps to enable employees to do what's right and ensure compliance with our Code of Ethics and all applicable laws. At the same time, with the large number of people we employ, we cannot exclude the possibility of misconduct by individuals, but we take every possible violation of our Code very serious. We have extensive measures in place to ensure that reports of suspected misconduct are investigated thoroughly. Where misconduct is found, we take swift and appropriate action. 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 employees are empowered to do what's right.



## **SpeakUp**

The SpeakUp Office helps Novartis act with high ethical standards.

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