

## Public Policy

At Novartis, our purpose is to reimagine medicine to improve and extend people's lives. To achieve this, we engage in dialogue with policymakers and other stakeholders on relevant policy topics including supporting innovation in the life sciences and expanding access to medicines.

We believe that constructive engagement based on evidence-based data and scientific insights help to inform public policy and promote understanding among our stakeholders. In representing the perspective of Novartis to external stakeholders, we aim to be a trusted partner that works together with governments, regulatory bodies and others to create positive impact for patients, healthcare systems and society.

### Our approach – partner of choice

Innovation is core to what we do at Novartis. For innovation to thrive, it should be underpinned by a robust and progressive legislative foundation. To this end, we aim to provide policymakers with key insights that can help facilitate vital decisions for today and tomorrow.

The Novartis Public Affairs function assesses political, legislative, and regulatory decisions that have a potential impact on patients and on our industry across the globe. We participate in policy discussions regarding the future of healthcare with partners through various stakeholder dialogues and industry platforms.

Our focus is on creating solutions together with our partners that help communities and society tackle the burden of disease. Engaging with trade associations also facilitates a collaborative approach to highlighting and solving issues that affect patients.

In all of our activities, we encourage associates to take personal accountability for their decisions. We adhere to high standards of transparency and ethical behavior.

### Our principles for responsible lobbying

At Novartis, we are guided by three principles when conducting lobbying activities:

- **Principle 1:** Transparency, honesty and integrity are the core values reflected in how Novartis conducts lobbying activities.
- **Principle 2:** All lobbying activities should inform policy-making in favor of improving and extending people's lives through innovative science and technology, delivering breakthrough treatments to as many people as possible and sustaining a rewarding business environment.
- **Principle 3:** Novartis associates must not attempt to improperly influence any decision by inducing lobbied stakeholders to act in violation of their lawful duties.

[Novartis Global Guideline for Responsible Lobbying \(95 KB\)](#)

### Our key policy areas

The healthcare landscape is constantly evolving. In a changing environment, our focus is on tackling healthcare challenges and helping to build sustainable health systems for the long term. By assessing relevant national, regional, and global developments, we gauge how our goals align with the needs of patients and society.

As part of our ongoing commitment to transparency, we state our position on issues that impact access to medicines for patients, our industry, and topics that matter deeply to our company and our stakeholders. [Learn more about our public policy positions](#)

### Where we operate

Novartis has Public Affairs dedicated offices in our Headquarters in Basel, Switzerland, in Brussels, Belgium, and Washington D.C., US. In addition, we have Public Affairs teams in many of our country operations around the world.

### Corporate political contributions

Novartis only makes political contributions in countries where such contributions by corporations are legal. Political contributions made by the company are not intended to give rise to any obligations on the part of the recipients, nor with the expectation of a direct or immediate return for Novartis. Such contributions are managed in a balanced way, and thus do not disproportionately favor any specific party or political ideology. At all times, Novartis is fully compliant with applicable laws, regulations and industry codes.

Novartis maintains a clear and explicit local approval process for making political contributions. Provision is to be made under a separate budget position and approved in the annual budget process. Funds in the US are disbursed in alignment with Public Affairs based on guidelines and approved by Legal, Compliance, and the country leadership team. In Switzerland, political contributions are supervised by Swiss Public Affairs and follow the internal approval processes.

### Novartis political action committee

Integral to the US political system is the role of political action committees (PACs). As such, the Novartis PAC, a voluntary, bi-partisan organization, was formed to support candidates for public office who advocate for issues important to the Novartis mission, demonstrate political leadership or represent a state or district where the company has a facility or a large concentration of employees. Members eligible to contribute to Novartis PAC are part of the company's restricted class who are either US citizens or green card holders. Novartis PAC only uses funds voluntarily contributed by eligible employees (but not from the company) to make political contributions. The PAC is not affiliated with any political party, candidate or other organization and may contribute to federal and state candidate campaigns, party committees, and Leadership PACs at any time during an election cycle. The Novartis PAC is subject to federal contribution limits established by the US Federal Election Commission (e.g., USD 5,000 to each candidate or candidate committee per election). Administration of the Novartis PAC is clearly defined in terms of soliciting contributions, determining candidate support, disbursement of funds and reporting.

### Disclosures

#### Disclosure of political contributions

Novartis discloses political contributions as required by law. Contributions made through the Novartis PAC are reported every month with the Federal Election Commission (FEC). Reports disclosing PAC contributions, are available for public access and can be found on the respective websites of the [Federal Election Commission \(FEC\)](#), the [Clerk of the US House of Representatives](#) and the [Office of the Secretary of the US Senate](#).

#### Disclosure of lobbying expenditures

In compliance with the US federal law, Novartis discloses all expenditures related to federal lobbying on a quarterly basis. To access Novartis lobbying reports, please reference the [United States Senate](#) and [House of Representatives](#) lobbying disclosure databases.

In compliance with the European Union (EU) law, Novartis discloses all expenditures related to EU lobbying on a yearly basis. To access Novartis lobbying details, please consult the [Europa.eu Transparency Register](#) lobbying disclosure databases. EU lobbying expenditures follow the Transparency Register Implementation Guidelines and are consistent with the guidance provided by the European Federation of Pharmaceutical Industries and Associations (EFPIA).

#### Disclosure of Memberships in trade associations

Novartis is a member of external groups representing various stakeholders, including trade and industry. These organizations include trade associations and business groups. Some of the trade associations lobby on behalf of Novartis.

Novartis discloses the global total of fees related to membership fees paid to trade associations. Names of selected EU memberships in trade associations can be accessed on the [Europa.eu Transparency Register](#).

## Governance

All Novartis associates and third parties retained by Novartis to lobby on behalf of the company must act in accordance with the principles and rules established in the [Novartis Global Guideline for Responsible Lobbying \(PDF 0.1 MB\)](#). In addition, any third party that acts or lobbies on behalf of Novartis is subject to our anti-bribery due diligence process before it can be engaged. Appropriate training is provided to all associates engaged in lobbying. The due diligence process for all third parties engaging with political stakeholders has been strengthened.

Overall Novartis political engagement is – like any other Novartis activity – governed globally by the [Novartis Code of Ethics \(PDF 6.5 MB\)](#) and relevant policies, such as the [Doing Business Ethically Policy](#) and the Third-Party Guideline. Compliance with all Novartis ethics, policies and guidelines is subject to monitoring through Novartis auditing mechanisms.

In addition, the Executive Committee of Novartis (ECN), led by the Chief Executive Officer (CEO), is responsible for implementing the company's environmental, social and governance (ESG) strategy. The CEO chairs our ESG Committee, which oversees the company's ESG strategy, including ESG disclosures.

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### General

- [Novartis in Society Integrated Report](#)
- [Novartis Global Guideline for Responsible Lobbying \(PDF 0.1 MB\)](#)
- [Novartis Code of Ethics \(PDF 6.5 MB\)](#)
- [Anti-bribery Policy \(PDF 0.4 MB\)](#)
- [Third Party Code \(PDF 0.4 MB\)](#)
- [Novartis Transparency and Disclosure page](#)
- [Novartis positions](#)
- [Ethical Use of Data and Technology Policy \(PDF 0.4 MB\)](#)

### European

- [European Commission Register of Interest Representatives](#)
- [Federal Election Commission \(FEC\)](#)

### US

- [Clerk of the US House of Representatives](#)
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