

# Code of Ethics

## Our commitment to doing what's right

Novartis is committed to ensuring our associates are empowered to do what's right. On September 01, 2020, we introduced a new Code of Ethics for Novartis. Created by our associates, for our associates, our new Code is a collection of our commitments to ethical standards across our business.

Our Code of Ethics was co-created with the inputs of thousands of associates. It is anchored in behavioural science, and underpinned by four clear ethical principles:

- Be Open-Minded
- Be Honest
- Be Bold
- Be Accountable

The Code of Ethics replaces our former Code of Conduct and is a fundamental part of the terms of employment for all associates of Novartis Group companies. All associates receive the Code when they join the Novartis Group and are held accountable to its contents. It is available in 22 languages and has been adopted by local boards.

The Code contains our principles and expectations for ethical business conduct that help guide our associates in making the right decisions when they encounter difficult situations or ethical challenges during the course of their work.

## Our Ethical Principles

The Code of Ethics focuses on our commitment to meet the expectations of our five key stakeholder groups: our patients, associates, shareholders, healthcare partners and society. While our purpose - to reimagine medicine to improve and extend lives - drives our values and defines our culture of inspired, curious and unbossed, our ethical principles guide us in our everyday decision-making and ensure we act with integrity.

## Ethical Decision Making Framework

Because ethics isn't black and white, we've created an online, interactive ethical decision making framework to guide our associates towards better decision making. The framework guides users through 15 questions, prompting deep reflection as part of the decision-making process, surfacing up to 6 possible biases and suggesting materials and resources for further learning. The framework does not replace conversation and consultation, and does not give a definitive answer about what one should do, but it helps broaden perspectives and encourages better understanding and application of our ethical principles.

Novartis expects leaders to lead by example. This means that leaders must accommodate ethical considerations in business planning and decision-making, empowering associates to make responsible decisions, and creating a safe environment to speak up when ethical challenges arise.

In addition, we encourage and reward ethical behavior by including an assessment of each associate's alignment to our values and behaviors in their annual performance appraisal. Achieving business objectives

and alignment with company values receive equal weighting in compensation reviews.

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## Related links

- [The Novartis Code of Ethics \(PDF 4.1 MB\)](#)
  - [Other policies and guidelines](#)
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