

## Whistleblow line

Welcome to the page with information about the **Internal Whistleblowing System** of Novartis s.r.o., ID No.: 645 75 977, with registered office at Na Pankráci 1724/129, Nusle, 140 00 Prague 4 (hereinafter referred to as the "**Company**"), which is established in accordance with Act No. 171/2023 Coll., on Whistleblower Protection (hereinafter referred to as the "**Act**").

**Please note that this website is not an access to reporting misconduct through the Speak-up Office, which still operates as before and also allows anonymous reporting.** Speak-up Office is available at [SpeakUp | novartis](#).

The internal reporting system, the description of which is set out on this page, is in place to meet the obligations set out in the Act.

### Who can submit a notification

The Company hereby excludes the receipt of notifications from any person who does not perform work or other similar activity for the Company as defined in Section 2(3)(a), (b), (h) or (i) of the Act. Thus, only a natural person who has performed or is performing work or other similar activity for the Company in accordance with the provisions of Section 2(3)(a), (b), (h) or (i) of the Act may submit a notification.

### What can be reported

Pursuant to the provisions of Section 2(1) of the Act, possible illegal conduct that has occurred or is about to occur at the Company may be reported, which:

- has the elements of a crime,
- has the characteristics of an offence for which the law sets a fine of at least CZK 100 000
- violates the Act, or
- infringes another legal regulation or a regulation of the European Union in the field of
  - financial services, due diligence and other assurance services, financial products and financial markets
  - corporate income tax,
  - prevention of money laundering and terrorist financing,
  - consumer protection,
  - compliance with product requirements, including product safety,
  - transport, traffic and road safety,
  - environmental protection,
  - food and feed safety and animal health,
  - radiation protection and nuclear safety,
  - competition, public auctions and public procurement,
  - protection of internal order and security, life and health,
  - protection of personal data, privacy and security of electronic communications networks and information systems,
  - the protection of the financial interests of the European Union, or
  - the functioning of the internal market, including the protection of competition and state aid under European Union law.

### Content of the notification

The notification must contain the name, surname and date of birth or other information from which the identity of the notifier can be inferred. Anonymous submissions shall not be considered as notifications and shall not be investigated by the dedicated person.

The notification must not contain knowingly false information, i.e. information that the notifier has no reasonable grounds to believe is based on the truth. The notifier should act in the public interest and in the good faith belief that the notification it makes is based on reliable facts and factual evidence.

A notification shall not be deemed to be that part of the notification which contains information the notification of which could immediately endanger the essential security interest of the Czech Republic, the activities of the intelligence services of the Czech Republic, or the notification of which would constitute a breach of the duty of confidentiality of the clergy in connection with the exercise of confessional secrecy or a right similar to confessional secrecy.

In obtaining documents to substantiate the facts reported, the whistleblower should not commit an act that could constitute a criminal offence.

The extent and quality of the information provided can positively influence the way in which the notification is investigated and, where appropriate, the corrective and preventive measures taken. Please note that you will help us investigate your report if you identify the area of the violation and share with us details of the alleged violation, such as the date, time or period during which the alleged violation occurred, exactly what the violation was, who committed the violation, how you learned of the violation, identify witnesses, etc.

### Method of notification

The notifier may submit the notification to the dedicated person of the Company, who is:

Eva Sovová, Country ERC Head, Ethics Risk & Compliance, namely:

- in writing at [whistleblowing.cz@novartis.com](mailto:whistleblowing.cz@novartis.com);
- verbally at 734 613 548; or
- at the request of the notifier in person.

Notification can also be made to the Department of Justice by the methods listed at <https://oznamovatel.justice.cz/chci-podat-oznameni/>.

### Processing of personal data

Please note that by notifying the dedicated person of the Company, you confirm that you have read the information below about the processing of your personal data:

- The Company, as a personal data controller, will process your personal data to the extent of identification data and other data provided in the course of the investigation of the notification submitted by you (hereinafter referred to as "**Personal Data**") for the purpose of fulfilling the obligations set forth in the Act, i.e. in particular the investigation of the notification submitted by you;
- The lawful reason for processing Personal Data is the performance of the Company's legal obligations;
- The personal data will be processed for the duration of the stated purpose or for a ~~192~~ **12** reasonable period of time thereafter, unless the Company is otherwise entitled to continue

to process them;

- The Personal Data will be accessible to the dedicated person of the Company;
- Your personal data may also be disclosed and transferred to any national and/or international regulatory or supervisory public authority or court where we are required to do so under applicable law or at their request;
- We have put in place appropriate technical and organisational measures to ensure an adequate level of security and confidentiality of your personal data. These measures take into account: I. the state of the art; II. the cost of implementation; III. the nature of the data; IV. the risk of processing. The purpose is to protect against accidental or unlawful destruction or alteration, accidental loss, unauthorised disclosure or access and against other unlawful forms of processing.
- You have the right to request from the Company access to Personal Data, its correction or deletion, or restriction of processing, as well as the right to portability of Personal Data and the right to lodge a complaint with the Office for Personal Data Protection;
- If you have any questions or wish to exercise the above rights, you can send an email to [privacy-1.czech@novartis.com](mailto:privacy-1.czech@novartis.com).
- If you are not satisfied with how we process your personal data, please contact our Data Protection Officer [global.privacy\\_office@novartis.com](mailto:global.privacy_office@novartis.com) who will investigate your matter.

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