

# Doing Business Ethically

**The Novartis Anti-Bribery and  
Professional Practices Policy**

**Novartis Global Policy**

## Document History

| Version | Change(s)  |
|---------|--|
| 1.0     | First version, replacing the former Novartis Anti-Bribery and Professional Practice Policies |

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# 1 Introduction

## 1.1 Purpose

At Novartis, we reimagine medicine to improve and extend people's lives, using science and technology to address some of society's most challenging healthcare issues. Our purpose drives our values and defines our culture, and our ethical principles guide us in our everyday decision-making; enabling us to act with integrity and to build trust with society.

This Policy builds on the principles and commitments outlined in our [Code of Ethics \[1\]](#). It aims to ensure that we maintain high ethical standards in all our external interactions.

## 1.2 Scope and Applicability

This Policy covers all interactions with External Stakeholders where there is a potential risk of bribery, inappropriate influence, unethical business, or unethical promotional practices.

Its content also serves as the foundation for our [Handbooks \[2\]](#), which provide more detailed guidance relating to certain activities. As such, the policy should be read in conjunction with the [Handbooks \[2\]](#) (Working Practice Documents for the US), [Anti-Bribery Third Party Guideline \[3\]](#), and other Novartis policies, standards, or guidelines, where relevant.

The Policy and its [Handbooks \[2\]](#) are available in a digital format through the [BeSure Platform](#). All interactions must be conducted in accordance with local laws, regulations, and industry codes. Where any local laws, regulations, and industry codes are more stringent than those established in this Policy, the more stringent requirements must be applied.

Please note that situations of potential, perceived, or actual conflicts of interest, and passive bribery (e.g., receipt of a bribe) are regulated by the [Conflicts of Interest Guideline \[4\]](#).

This Policy applies to all Associates.

The Policy is effective as of **1<sup>st</sup> November 2023** and must be implemented by all Novartis affiliates. It replaces the existing versions of the Novartis Anti-Bribery Policy (AB) and the Novartis Professional Practices Policy (P3).

It is the responsibility of all our Associates engaging a third party to ensure the third party is contractually obligated to adhere to the relevant provisions of this Policy and [Handbooks \[2\]](#).

## 1.3 Roles & Responsibilities

| Role           | Responsibilities   |
|----------------|--|
| All Associates | <ul style="list-style-type: none"><li>Required to adhere to this Policy and comply with all the requirements when interacting with External Stakeholders</li></ul> |
| Managers       | <ul style="list-style-type: none"><li>Ensures compliance with this policy</li></ul>  |
| Corporate ERC  | <ul style="list-style-type: none"><li>Owns and maintains this policy</li></ul>   |

## 2 Our Code of Ethics Commitments

Our commitment to doing business ethically is at the heart of all that we do. In our rapidly changing world, every one of us remains accountable for our actions, our decisions, and our interactions with stakeholders.

As set out in our [Code of Ethics \[1\]](#), we make the following commitments that every one of us need to uphold:

### 2.1 We do not tolerate any form of bribery or corruption

Bribery can take a variety of forms. Even common business practices or social activities, such as the provision of gifts and hospitality, can constitute bribes in some circumstances.

We therefore commit that:

- We do not give, offer, or promise to give anything of value (e.g., gifts, favors, hospitality, payments, etc.) for the purpose of improperly influencing any decision.
- We do not use third parties / intermediaries (e.g., agents, consultants) or any other business partner to commit acts of bribery or corruption.
- We do not make facilitation payments, even if local law permits.
- We do not distinguish between Government and Public Official (GO), and private persons so far as bribery and corruption are concerned: bribery and corruption are not tolerated, regardless of the status of the recipient.

Before giving, promising, or offering anything of value to any person, we must always ask ourselves if what we are considering could be reasonably viewed as having an illegitimate purpose. **If yes, we do not proceed.**

### 2.2 We will maintain high standards of ethical business conduct

We are accountable for our actions, decisions, and how we interact with our stakeholders. We adhere to all legal and regulatory requirements and comply with self-regulations established by our industry.

We therefore commit that:

- We engage with our stakeholders in a responsible, ethical, and transparent manner.
- We ensure that our interactions have clear, truthful, transparent, and appropriate objectives, that are intended to benefit patients, the practice of medicine, and overall healthcare systems.
- We treat our stakeholders with mutual respect and avoid the creation of any conflict of interest for them, or any reasonable perception thereof.
- We determine fair, appropriate, and objective compensation for the services provided by stakeholders.
- We disclose transfers of value and Novartis involvement with relevant stakeholders when stipulated by local laws or industry regulations, and continuously assess where additional disclosures are possible and appropriate to foster transparency.

- We value and respect the independent decision-making undertaken by our stakeholders. We safeguard the integrity and validity of the data obtained during research, as well as respect and protect the rights, safety, and well-being of patients and animals.
- We do not seek or knowingly accept any information that would violate confidentiality and / or privacy rights of any of our stakeholders.

### 3 Our Risk Framework

Our Risk Framework provides a structured approach to manage risks associated with our external interactions. It is designed to help us identify, assess, and manage those risks.

Before we engage in any activity or interaction, whether in person, via digital channels or by a mix of both, we consider the following:

#### **Define clear objectives**

We conduct activities that have clear, transparent, truthful, and appropriate objectives. This ensures we stay focused on achieving the intended purpose throughout the activity.

#### **Assess the risk**

We identify and assess the risk of actual, potential, or perceived bribery, or inappropriate influence, as well as the risk of disseminating any misleading information, and develop mitigation measures to address such risks. This ensures we only conduct activities where the potential risks can be appropriately managed.

#### **Interact appropriately**

We act ethically, with integrity, and in compliance with local laws, regulations, industry codes, and internal policies. This ensures we maintain trust and meet the expectations of our internal and External Stakeholders.

#### **Monitor, reconcile and learn**

We monitor and reconcile our activities to ensure the activity is conducted as approved, achieved its intended objectives, the identified risk is managed appropriately, and the relevant supporting documents are maintained and retained. This ensures we can learn and respond to new circumstances, and continuously improve our ways of working.

### 4 Our Interactions

When we interact with different types of external stakeholders, such as Health Care Professionals (HCPs) and Health Care Organizations (HCOs), Patients, Caregivers and Patient Organization (PO), Government and Public Officials (GO), academic and scientific Institutions, payers, wholesalers and distributors, suppliers, non-government organizations (NGO), Media Representatives and Social Media Influencers, we commit to act responsibly, ethically, transparently, and professionally.

## Basis of Interactions

We must consider the intended purpose of our activities and whether they are of a promotional or non-promotional nature. This is to preserve the integrity of non-promotional activities and respect the boundaries separating them from promotional activities.

We do not promote products directly to patients or the general-public, unless permitted by local laws or regulations. Where such direct-to-consumer (DTC) promotion is allowed, we conduct it responsibly according to the applicable regulation and we never encourage unnecessary or excessive use of Novartis products.

We do not use materials with any promotional content in any non-promotional context to avoid any perception of disguised promotion.

## Standards of Information and Materials

We share information that is accurate, clear, fair, balanced, truthful, and not misleading.

We only promote products in alignment with the approved label and upon receipt of marketing authorization.

We only use information in a promotional context that is substantiated either by reference to the approved label or by scientific evidence.

We may receive unsolicited requests for information on unapproved drugs and indications (off-label) from HCPs, patient organizations, and other External Stakeholders. Only certain representatives from Medical or any other function with assigned authority may provide such information reactively.

## Types of Interactions

Interactions with External Stakeholders may take various forms. We classify these interactions into the following three broad categories:

1. Engagement
2. Funding and Collaboration
3. Gifts, Samples, and other Items

### 4.1 Engagement

We choose to work with reputable External Stakeholders that have the necessary experience and capabilities to provide the services requested. We do not pay for services without adequate evidence of performance.

We may engage External Stakeholders either directly or via a third party. However, irrespective of how we engage, we are responsible for interacting appropriately, and without the intent, perception, or consequence of inappropriately influencing any decision of our stakeholders, including the recommendation, purchase, prescription, or use of our products.

In addition to these general requirements for **all** engagements, certain types of engagement may require additional consideration as outlined within this section.

## Research

We conduct research only if it is designed to answer relevant scientific, health economics, behavioral, policy, or societal questions intended to better understand and enhance patient care or any other related objective.

We respect and protect the rights, safety and well-being of patients and animals, and safeguard the integrity, confidentiality, and validity of the data obtained. We follow applicable and established ethical, scientific, legal, and regulatory standards, and ensure that our research has social and clinical value.

We ensure that:

- The selection of research subjects is fair, ethical, and respectful of the important principles of diversity and inclusion. Research must never be promotional in nature.
- Our studies are conducted by qualified investigators and at appropriate sites/centers.
- Adverse events are identified, collected, monitored, duly followed up and properly reported to the relevant health authorities or bodies as per applicable laws and regulations.
- Study results are published in a timely manner and do not withhold or suppress data. We protect confidential, patentable and/or personal information.

## Professional Services

We engage External Stakeholders for professional and legitimate services including but not limited to consultancy, advisory services, and speaker programs.

We document the agreed services to be performed. For paid professional services, it must be documented in a written agreement that is executed and binding on all relevant parties before the services have been started.

Special considerations apply to the following External Stakeholders:

- GO cannot be engaged for paid professional services if they have a direct / actual position to influence Novartis business.
- HCPs, scientists, and academics, who fall under the definition of a GO, may provide paid professional services, provided they act in their capacity as an HCP, scientist, or academic. When acting in this capacity, they may be subject to additional laws, regulations, and industry codes, which we must abide.
- When engaging influencers for services, all commitments and requirements referenced/defined in this Policy apply. This is to address the risk of undue influence towards HCPs, patients, or vulnerable groups, including the risk that digital content could be perceived as improper promotion of Novartis products.

## Pharmacy Services

We may engage pharmacies to provide promotional and non-promotional services using pharmacy resources and capabilities. We do not use pharmacy services to improperly influence individual HCPs, HCOs, or Patients.

## Events and Professional Meetings

We organize events and professional meetings, or fund third-party organized events and professional meetings for scientific, educational, policy, promotional, or other professional purposes. Such events may be conducted physically or virtually.

For Novartis organized events and professional meetings:



- We must have a clear and justifiable purpose, and the event must be conducted transparently, and in a venue that is conducive for the purposes of the exchange, may not be perceived as extravagant or inappropriate, and in accordance with local laws, regulations, and industry codes.
- We may provide hospitality only to the participants in the form of refreshments and/or meals, which are moderate, reasonable, and incidental to the main purpose of the event.
- We do not provide entertainment to any HCP attending Novartis business meetings, congresses, or comparable events. For any event involving any stakeholder other than HCP, no entertainment is provided unless the entertainment is an appropriate, incidental part of such events, allowed under local laws and regulations. We do not pay for any side or extended trips.
- We do not pay for the entertainment, hospitality, or travel costs of anyone who accompanies an invitee to a Novartis business meeting, congress, or comparable event. In situations where an invitee is unable to travel alone (e.g., patients or minors), or must travel with official delegates, travel costs for an accompanying person (e.g., caregiver, or official delegates) can be paid, provided that the rationale for this support is legitimate, documented, and considers applicable data privacy requirements.

For third party organized events and professional meetings:

- We consider the standards defined for Novartis organized events when assessing their appropriateness.
- We document any funding support for events organized by a third party in writing, which should then be acknowledged by both parties.
- We do not pass on any benefits received from the third party event organizers to a customer or a potential customer.

## Learning and Education

Learning and education has the purpose of enhancing the scientific knowledge, skills, and competence of HCPs, and GOs to improve patient care, medical practice, and overall patient and healthcare outcomes.

We may fund participants to attend third party events (e.g., Congresses) where there is a clearly identified educational need in the market. Such a third party event could be in-person (domestic / international), virtual, or hybrid. Where feasible, appropriate and in line with educational objectives, we should consider supporting virtual attendance for HCPs who will not be speakers, consultants, poster presenters or who will not otherwise have an active role on behalf of Novartis.

We do not pay any costs associated with persons accompanying HCPs or facilitate their attendance.

GOs may be subject to additional laws, regulations, and industry codes.

## Public Policy Engagement

Our public policy engagement activities are essential to enable a constructive dialogue with External Stakeholders, such as GO with the intent to create and support evidence-based solutions that improve access to innovative medicines.

We engage with External Stakeholders based on the values of transparency, honesty, and integrity, with a legitimate purpose, and ensure that our public policy positions and intended outcomes are clear to our stakeholders and documented appropriately.

We conduct public policy engagement activities with a collaborative, and unbiased mindset with the objective of delivering long-term value to our stakeholders.

We ensure that our public policy engagement activities are not misused for any corrupt or illegal purposes, or to improperly influence any decision.

We disclose our expenses related to public policy engagement in compliance with our internal policies, including [Code of Ethics \[1\]](#), applicable laws, regulations, and industry codes.

## Pricing and Market Access

We may interact with External Stakeholders involved in recommending or deciding product reimbursement or purchase of Novartis products. When doing so:

- We ensure that all discussions are truthful, accurate, and transparent.
- We disclose the engagement of HCPs, scientists, or academics, who are formulary committee members, according to local laws, regulations and industry codes and accurately and appropriately record discounts, rebates, and other payments in our books and records.
- We adhere to applicable local laws and regulations.
- If the discussion relates to products that are not yet approved in the country or region, we ensure that all communication is non-promotional.

If these interactions are with GO, we recognize that they may be subject to additional laws, regulations, and industry codes.

## Patient Engagement

We may support or engage with Patients, Caregivers, or Patient Organizations.

When providing support to, or engaging with Patients or Patient Organizations, we ensure that all interactions are ethical, transparent, non-promotional, consistent with Novartis' mission, and maintain the independence of the Patient and Patient Organizations.

We document any engagement or support in a written agreement, which includes the nature of support, the amount of funding, clear deliverables, and the purpose of the activity.

## Patient Support Programs (PSPs)

We may provide support to patients and patient organizations in the form of Patient Support Programs for a fixed period of time. These programs can have a financial component, support product usage, general patient support, product/disease education, diagnosis, or a combination.

We must not design or use PSPs to encourage the prescription of Novartis products.

If a PSP includes the collection of data from patients, including feedback on the program, additional regulations may also apply. Similarly, if a PSP contains a digital or software component then digital engagement or regulatory governance may also apply.

Adverse events are identified, collected, monitored, duly followed up and properly reported to the relevant health authorities or bodies as per applicable laws and regulations.

## Managed Access Programs (MAPs)

We may, if permitted by local law and/or regulations, provide access to locally unapproved or unavailable Novartis products outside of clinical trials to patients with a serious or life-threatening disease or condition with no comparable or satisfactory alternative therapy. Such access is provided only if all MAP criteria, including the criterion that it is unsolicited, are met. Requests must be independently received from a HCP, HCO, healthcare authority, or any other relevant qualified authority.

## Digital Health Initiatives

We may support the use of technology to help improve an individual's health and wellness, address improvements in diagnosis, disease management, and overall healthcare - and reduce the cost of healthcare, including symptom trackers, companion applications and diagnostic tools.

We can do this by developing digital solutions, providing content within third party platforms, or supporting access to such platforms via licenses and/or subscriptions. In all cases, the goal is to enhance patient access and/or reduce existing health disparities.

## Utilizing Social Media and Digital Channels

We are living in an "Information Society", which offers digital channels and social media as new means of delivery, communication, and interaction with our External Stakeholders about pharmaceutical products and therapeutical areas. For the use of these channels, the [Social Media Guideline \(Personal Use of Digital Engagement Platform\) \[5\]](#) applies, and additional risks related to the use of social media need to be considered and managed.

## Using Third Parties

We only engage third parties if:

- They are committed to live up to our Novartis standards, such as those covered in the [Third Party Code \[6\]](#).
- The services and goods are priced at no more than market value, unless allowed as per the [Global Procurement Guideline \[7\]](#).
- The third party is suitable for the prospective activity, and the appropriate due diligence has been conducted (including anti-bribery due diligence where relevant) in line with the [Anti Bribery Third Party Guideline \[3\]](#).
- There is a written contract, or other written document with a similar legal effect, for example a Purchase Order. The relevant provisions of the [Global Procurement Guideline \[7\]](#) should be applied.

## 4.2 Funding and Collaborations

We may collaborate with or provide funding to reputable External Stakeholders to improve healthcare, advance scientific/medical knowledge, or support the communities where we live and work, we may collaborate with, or provide funding to reputable organizations.

All types of funding and collaborations must have clear and transparent objectives and should be documented.

## Funding

We may provide funding to external organizations to drive Novartis mission, advance scientific knowledge, or support communities. This can be provided in the form of healthcare, philanthropic or corporate citizenship funding.

Funding to support third-party sponsored clinical research activities should be done via the Investigator Initiated Trial/Research (IIT/IIR) route.

Sponsoring of HCPs and events organized by third parties are regulated under section 4.1 Engagement.

When providing funding we:

- Only support legitimate reputable organizations, but never individuals.
- Avoid any potential conflicts of interest, and never use funding to gain an improper advantage, or prompt favor with a funding recipient.
- Ensure that any funding is reasonable, considering the type of activity being supported and is properly tracked, documented, disclosed, and accounted for, as required by local laws, regulations, and industry codes.

## Collaborative Working Arrangements

We may decide to collaborate with reputable External Stakeholders to strengthen healthcare systems and increase patient benefit at scale. The objective of such collaborations must aim to improve patient care, enhance patient experience, or strengthen healthcare system overall.

We ensure all parties involved in the collaboration are active and contribute to the advancement of the shared objectives, which must be clear and transparent.

## Political Contribution

We may only make political contributions where these are customary in the country to help build sustainable healthcare systems, advance breakthrough medical innovation or otherwise support legitimate interests of Novartis. When making a political contribution, we must adhere to the following requirements:

- Compliance with applicable laws, regulations, and industry codes.
- Covered by a dedicated budget and approved in the ordinary budget process.
- Approved in advance by the relevant Novartis Country President, or his/her designee or delegate with Public Affairs.
- Appropriate due diligence has been conducted on the political party and the delegate receiving the contribution.

## Membership of Professional Organizations

We may become a member of professional organizations, including trade associations and medical societies to represent the voice of Novartis. When doing so, we ensure that such memberships:

- Are aligned with Novartis' overall mission and interests
- Have clear expected outcomes and are properly documented prior to joining any such organization.
- Are approved by the head of the Novartis legal entity in the country, or his/her designee or delegate

- Comply with applicable law and regulations.

We do not join an organization with the intent of unduly influencing the organization or its members.

Participation and exchange of information in trade associations must follow the requirements of the [Antitrust and Fair Competition Policy \[8\]](#).

We never fund or reimburse External Stakeholders to become a member of a professional organization.

### 4.3 Gifts, Samples, and other items

We never promise, offer, or provide anything of value with the intent of influencing the recipient to do something favoring Novartis, to reward such behavior, or to refrain from doing something disadvantaging Novartis.

#### Gifts, hospitality & entertainment

We do not provide cash and gifts that are cash equivalent (e.g., gift cards) to any External Stakeholder.

We do not provide entertainment, any gifts of any kind including personal gifts, Cultural Acknowledgements, or promotional aids, whether branded or unbranded, to HCPs, HCOs, PO or Patients and their family members. We must not use personal funds for any of these items.

Gifts to GO, Media and other External Stakeholders (not mentioned above) are discouraged. Gifts in the form of small tokens of appreciation may only be allowed if all the following conditions are met:

- It is modest, reasonable, infrequent, and given in a transparent way, and
- It is permitted under the local laws, regulations, and any internal policies applicable to the recipient
- It is not provided to a recipient who is in a position of making a decision about Novartis.
- It does not give rise to a real or perceived conflict with the official duties of the recipients,
- If not providing such token would cause embarrassment or be perceived as disrespectful in the context of local customs.

Situations where we accept or are offered to receive a gift are regulated by the [Conflicts of Interest Guideline \[4\]](#).

#### Samples

Where permitted by local laws, regulations, and industry codes, we may provide free samples of Novartis pharmaceutical products to HCPs authorized to prescribe that product, to familiarize themselves and patients with the product, with the ultimate purpose of enhancing patient care.

When providing samples:

- We do not provide them as an inducement to recommend and/or prescribe, purchase, supply, sell or administer Novartis products.
- We may distribute over the counter (OTC) product samples directly to patients, where permitted by local laws, regulations, and industry codes.
- They must be marked as samples to prevent resale or any other misuse.

## Items of Medical Utility and Educational Items

Where permitted by local laws, regulations, and industry codes, we may offer or provide items of medical utility to HCPs if modest, reasonable in value, and offered on an occasional basis.

Items of medical utility must:

- Be intended for the direct education of HCPs, or patients, or to assist patients in the administration of their treatment, or management of their conditions, and
- Not offset normal operating cost or routine business expenses or have a personal benefit to the HCP.
- Not use product branding (no product logo), unless branding is essential for correct use of the item by the patient, or required by local law, regulation, or industry code.

The value of books and subscriptions must be reasonable. Other educational items must be of modest value.

We may provide demonstration and evaluation devices free of charge to HCPs or HCOs for a limited and agreed-upon duration.

When we provide devices, we consider the potential transfer of value, we ensure appropriate labelling, and do not provide them prior to receipt of the marketing authorization for their intended use in that market.

We ensure the ownership of the device remains with Novartis for the entire duration of the evaluation and that devices are not stored at any HCP or HCO facility when not being evaluated.

## 5 Controls

Controls for this document are stored in the Novartis Control Register at '[go/controlregister](#)'.

## 6 Breach of this Policy

Breaches of this document will result in remedial, corrective, or disciplinary actions up to and including termination of employment.

Actual or suspected incidents of misconduct are to be reported in line with our [SpeakUp Policy \[9\]](#). Novartis will take steps to ensure confidentiality and prohibits any form of retaliation against an associate who raises in good faith a concern about suspected or actual misconduct through any channel, or who cooperates in an investigation of misconduct.

## 7 Exceptions

Exceptions to this Policy are not permitted.

## 8 Adaptations

Adaptations to this Policy are not permitted.

## 9 Definitions

| Term                                | Definition  |
|-------------------------------------|---|
| Associate                           | Employees, including officers and managers, of Novartis AG and its affiliates and any external associate employed through an external service provider.   |
| Bribery                             | Offering, giving, or promising (or authorizing someone to offer, give, or promise) an improper benefit, directly or indirectly, with the intention of influencing or rewarding the behavior of someone to obtain or retain a commercial advantage.  |
| Caregiver                           | A person who helps a patient with daily activities, healthcare, or any other activities that a person is unable to perform him/herself due to illness or disability. This person may also participate in or make medical decisions for a patient. Examples of caregivers include parents or legal guardians, spouses or partners, adult children, relatives, or other friends.  |
| Cultural Acknowledgment             | An inexpensive item, not related to the practice of medicine (also referred to as 'Courtesy Gift') to acknowledge significant national, cultural, or religious holidays or events.  |
| External Stakeholder                | Any person who is not an Associate or working for Novartis and who's action may have an impact on Novartis.   |
| Facilitation Payments               | Payments to GO to expedite the performance of duties of a non-discretionary nature. These payments are intended to influence only the timing of the government officials' actions (e.g., payments to expedite the issuance of a visa or clearing goods through customs), but not their outcome.   |
| Fair Market Value (FMV)             | Methodology to define the appropriateness of payments for services provided within a given country.   |
| Gifts                               | Gifts are benefits of any kind given to someone as a sign of appreciation or friendship without expectation of receiving anything in return. They include 'courtesy gifts', which are small gifts given at culturally recognized occasions (e.g., weddings, funerals) or special times of the year (e.g., Christmas, New Year).   |
| Government and Public Official (GO) | <p>Any elected or appointed officer or employee of a government or government department, government agency, or of a company owned or partially owned by a government. Medical and scientific personnel qualify as government officials when they work at a hospital, clinic, university, or other similar facility owned or partially owned by a government.</p> <ul style="list-style-type: none"> <li>• Any elected or appointed officers or employees of public international organizations, such as the United Nations</li> <li>• Any person acting in an official capacity for or on behalf of a government or a government department, government agency, or of a public international organization</li> <li>• Politicians and candidates for a political office</li> <li>• Any other person who is a government official according to applicable laws, regulations, and industry codes</li> </ul> |
| Health Care Organization (HCO)      | Any legal entity (such as a company, partnership, or healthcare institution), whether public or private, that offer/provide Medical   |

|   |  |
|---|--|
|   | Services to patients and may prescribe, order, dispense, recommend, purchase, supply, administer, lease, and use Novartis products, and all members of their office staff, and medical associations or organizations.  |
| Health Care Professional (HCP)                  | Any member of the medical, dental, pharmacy or nursing professions or any other person who during his or her professional activities may prescribe, recommend, purchase, supply, sell or administer a pharmaceutical product.  |
| Investigator Initiated Trial/Research (IIT/IIR) | Studies with scientific and medical merit developed and sponsored by an independent investigator or academic sponsor. An IIT may be a clinical or non-clinical study conducted without the participation of Novartis, for which the IIT sponsor requests Novartis to provide either funding, drug product or both.   |
| Managed Access Program (MAP)                    | Programs that provide medical products that are not yet approved or available in their country to patients with serious or life-threatening diseases or conditions.  |
| Media Representative                            | Any individual representing a radio, television station, newspaper, newsmagazine, periodical, website, blog, or news agency to gather and report on a Novartis issue.  |
| Patient   | A person with personal experience of living with a disease. Their main role is to contribute with their subjective disease and treatment experience.   |
| Patient Organization                            | A not-for-profit institution that primarily represents the interests and needs of patients, their families and/or caregivers.  |
| Patient Support Programs (PSP)                  | Patient Support Program (PSPs) is an umbrella term to describe programs or initiatives to improve access, usage, and adherence to medicinal products. In some jurisdictions local law may require that such programs be provided only after a patient has been or is intended to be prescribed a Novartis therapy  |
| Pharmacy  | Any legal entity that is qualified and, if applicable, licensed to recommend, administer, or dispense medicinal products. The term "Pharmacy" includes individual pharmacies, pharmacy chains (several individual pharmacies connected either legally or by the same management / ownership or Marketing Service Provider that has authorization to conclude the contract and execute Services in pharmacies that are different legal entities gathered together e.g., buying groups, pharmacy societies, franchises) as well as individuals registered as pharmacies. |
| Pharmacy Services                               | Any arrangement where pharmacy resources and/or capabilities are used by Novartis with one of the following purposes: <ul style="list-style-type: none"> <li>• to promote /advertise Novartis and/or product brand to end customers; or</li> <li>• to purchase data needed for proper internal decision making &amp; analysis; or</li> <li>• to facilitate patient access to Novartis products (i.e., physical availability of the product in the pharmacy, facilitation of discount campaigns for end consumers etc.).</li> </ul>                                     |
| Promotion                                       | Any activity undertaken, organized, or sponsored by Novartis which is directed at HCPs to promote the prescription, recommendation, supply, administration, or consumption of our pharmaceutical product(s) through all methods of communications, including the internet.   |



|                         |   |
|-------------------------|---|
| Social Media Influencer | A Social Media Influencer is a person that has established credibility in a certain industry or content type that has access to a wide audience and whose opinion is positively regarded by the target audience.  |
| Third Party             | A third party is any individual or legal entity with whom Novartis interacts by providing/receiving goods and/or services/activities. Novartis affiliates and Associates, HCP, and HCO are not considered third parties for the purpose of this policy. |

## 10 Abbreviations

| Abbreviation | Description                     |
|--------------|---------------------------------|
| <i>DTC</i>   | Direct to Consumer              |
| <i>FMV</i>   | Fair Market Value               |
| <i>GO</i>    | Government or Public Official   |
| <i>HCO</i>   | Healthcare Organization         |
| <i>HCP</i>   | Healthcare Professional         |
| <i>IIR</i>   | Investigator Initiated Research |
| <i>IIT</i>   | Investigator Initiated Trial    |
| <i>MAP</i>   | Managed Access Program          |
| <i>PO</i>    | Patient Organization            |
| <i>PSP</i>   | Patient Support Program         |

## 11 References

| Reference Number | Document Name  |
|------------------|--|
| 1                | Code of Ethics   |
| 2                | Doing Business Ethically Handbooks                                   |
| 3                | Anti-Bribery Third Party Guideline                                   |
| 4                | Conflict of Interest Guideline                                       |
| 5                | Social Media Guideline (Personal Use of Digital Engagement Platform) |
| 6                | Novartis Third Party Code  |
| 7                | Global Procurement Guideline   |
| 8                | Antitrust and Fair Competition Policy                                |
| 9                | SpeakUp Policy   |