

# EQUAL OPPORTUNITY POLICY

## Objective

Novartis Equal Opportunity Policy is to provide equal opportunity to all applicants and provide individual growth opportunities to all associates in accordance with all applicable laws of land, government orders and corporate guidelines. This Equal Opportunity Policy is in accordance with the provisions of The Rights of People with Disabilities Act, 2016.

## Applicability

This policy covers all persons with disabilities. The policy applies to all employees of Novartis in India. It also applied to those employees who acquire disability during their work tenure at Novartis in India.

## I. Policy

The policy lays emphasis on Novartis continuing practice of non-discrimination in employment. This policy applies to all terms, conditions, and privileges of employment including recruitment, training and development, job assignment, supervision, promotion or transfer, compensation, benefits, social and recreational programs, termination, and retirement.

Employment actions are based upon operating needs of Novartis and individual applicant or associate merit, including, but not limited to, qualifications, experience, ability, availability, cooperation and job performance.

## II. Equal Opportunity for Persons with Disabilities

In accordance with the provisions of The Rights of Persons with Disabilities Act, 2016 and Rules, it is Novartis policy to ensure that the work environment is free from any discrimination against persons with disabilities. The Act lists down the disabilities covered (as amended from time to time). Further, Novartis will take all actions to ensure that a conducive environment is provided to persons with disabilities to perform their role and excel in the same. We continuously strive to ensure that all our facilities, technologies, information and privileges are accessible to person with disabilities.

In this regard, the Novartis will build systems and process to ensure:

- That appropriate facilities and amenities will be provided to persons with disabilities to enable them to effectively discharge their duties in the establishment.
- No opportunity will be denied to persons with disabilities and there will be no discrimination of any manner.
- Our associates will be personally responsible for treating each other with respect and dignity, which includes respecting the rights and differences of others.
- P&O Department will ensure a Liaison officer is designated to oversee the provision of required facilities/amenities including the process of recruitment for persons with disabilities.
- Developmental and promotional opportunities will be based on performance, ability and potential, and will be consistent with the needs of the business.

Novartis will not tolerate harassment, behavior that is discriminatory or behavior that victimizes any individual or group in our workplaces. Appropriate action basis investigation will be taken if employees breach this policy either through discrimination, harassment, bullying or victimizing other employees or by making false claims.

If an associate feels he or she is being subjected to discrimination, harassment, bullying or victimization, he or she can raise the same with the Liaison officer or use the existing grievance redress mechanisms like Speak Up office. All grievances and complaints will be taken seriously and treated with sensitivity and fairness.

## Roles & Responsibilities

### **A. Associate Responsibilities:**

All Novartis associates have the following responsibilities:

- To comply with this policy and all applicable laws and regulations. Compliance is required whenever an employee is acting in their capacity as a representative of Novartis.
- To report any incidents of violation of this policy.

### **B. Responsibilities of Managers and supervisors:**

Managers and supervisors have the following additional responsibilities:

- To monitor the work environment to ensure that it is free from discrimination and harassment and encourages inclusion and respect for others.
- To take reasonable steps to resolve complaints that are brought to their attention and to maintain confidentiality.

### **C. P&O Responsibilities:**

P&O representatives have the following additional responsibilities:

- To plan, monitor, review the process to ensure compliance with policy.
- To provide advice and address grievances relating to the employment of persons with disabilities and/or any other complaints regarding discrimination in any other form against any job applicant/employee.

## Interpretation & Guidance

In the event that any additional guidance and/or further interpretation is required, please contact your local P&O business / excellence partner.

## Review Timelines

The policy will be reviewed basis changes in legal guidelines.

## Communication of Policy

- This Policy will be available to all employees via the Intranet site and normal communication vehicles within the business.
- Suitable material will be included in Novartis publications, management conferences, and supervisory training courses.