

Business practice - Ethical business conduct

Business integrity and values are key drivers of success for Novartis. Our values, Code of Conduct, business-conduct policies and standards guide our associates in their activities and performance. High standards of integrity are central to achieving responsible research, sourcing, production, distribution, marketing and sales activities.

Ethical marketing practices

As a pharmaceutical company, we are responsible for **providing accurate information** and education to healthcare professionals and consumers.

As well as adhering to the principles of ethical business conduct outlined in our Code of Conduct and [Corporate Citizenship Policy \(PDF 0.2 MB\)](#), Novartis Pharma associates are guided by the specific standards for marketing activities described in the Novartis Global Professional Practices Policy (P3). Similar policies are in place for the other Novartis divisions. To ensure that our values are translated into action, all of our business interactions must be in conformity with our standards, as addressed in the Novartis guideline on business ethics and the P3 Policy. Furthermore, as a member of Innovative Medicines Canada, we must comply with the Innovative Medicines Canada's Code of Ethical Practices. It is particularly important that all individuals, organizations, and suppliers interacting with third parties on Novartis' behalf adhere to and comply with these values.

Third-party management

Novartis is a global company with operations in more than 140 countries. We deal with a large network of suppliers and other third parties that contribute to our success. The way we purchase supplies and contract out operations influences our cost and pricing structures and affects our reputation as a responsible corporate citizen. Because of this, third-party management is a key element of our commitment to corporate citizenship, as outlined in our Third-party Code of Conduct and the [Novartis Supplier Code \(PDF 0.4 MB\)](#).

Bribery and corruption

Novartis will not engage directly or indirectly in bribery. Bribery means to offer, promise or provide an undue benefit to a public official with the intention of obtaining or retaining an improper advantage by encouraging the official to act, or refrain from acting, in connection with an official duty. All activities of this nature are prohibited. As a result, the [Novartis Global Anti-Bribery Policy \(PDF 0.3 MB\)](#) outlines the necessary standards to this end.

Complaints handling

We support an open culture in which employees are required to report violations and are protected from retaliation or penalties. We believe this is key to deterring and preventing misconduct, and provides associates with the confidence that action is taken.

The SpeakUp Office provides our company with a formalized system for dealing with complaints of actual or suspected cases of misconduct. It offers employees and external stakeholders a channel through which grievances and allegations can be submitted, without fear of reprisal or penalty. All complaints are investigated

and substantiated cases are brought up to management so that appropriate action can be taken.

Integrity telephone lines have been introduced in 70 countries granting employees the option of reporting allegations in 51 languages. Confidential messages can be left for the SpeakUp Office, who endeavors to respond within 72 hours. The SpeakUp Office generally aims to turn around each case within eight weeks.

[Learn more about how we deter and prevent misconduct on our website Citizenship@Novartis](#)

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