

Ethical business conduct

We strive for high performance with high integrity. In line with this commitment, we operate a company-wide integrity and compliance program. Last year, Novartis associates worldwide completed more than 202 100 e-learning courses in various integrity and compliance topics. Each Novartis division has its own marketing code.

Visit our website dedicated to Corporate Citizenship

- [Business practice](#)
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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 \[Citizenship@Novartis\]\(#\)](#)

Healthcare companies play dominant roles in conducting and funding research and development (R&D). The pharmaceutical industry invests more than USD 50 billion a year in R&D – the most important source of investment in health research. During 2007, Novartis increased R&D investments by more than 20% to USD 6.4 billion. This is one of the highest figures in the industry relative to sales (16.9%). Novartis R&D efforts are driven by human health and well-being, contributing to overall prosperity and quality of life. Working at the frontier of science and technology in the field of human health means our activities may involve ethical issues, including animal welfare, stem-cell research and access to medicines. Novartis recognizes the importance of informed debate about such issues and welcomes the opportunity to engage in constructive dialogue

[Learn more about our commitment to responsible R&D on our website \[Citizenship@Novartis\]\(#\)](#)

Risky business

On average, only one in 10 000 originally synthesized compounds will clear all regulatory hurdles and become a commercially available drug. The R&D process for bringing a new drug to market can take eight to ten years to complete and cost up to USD 1.7 billion.

Novartis takes an active role in public-policy debates affecting our business. It is our responsibility to share our perspective, scientific knowledge and technical expertise with policymakers and regulatory authorities. It is also in our interest, as a good corporate citizen, to campaign for policies and regulations that favor ethical business conduct.

Trade associations aid in both of these goals while also raising standards across our industry and helping toward best-practice exchange.

We strive for constructive **partnerships with governments** and other stakeholders to increase access to medicines and health information while preserving incentives for research and innovation through competitive pricing.

In our lobbying and advocacy activities – as in all other areas of our business – we are governed by the Novartis Code of Conduct and we strive for integrity, openness, transparency and consistency in our business activities.

[Learn more about our commitment to responsible lobbying on our website \[Citizenship@Novartis\]\(#\)](#)

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