



Responsible Lobbying

**Novartis Global Guideline for conducting
lobbying activities based on transparency,
honesty and integrity**

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Version 1.1

1 Introduction

1.1 Purpose

The vision of Novartis is to be a trusted leader in changing the practice of medicine. To achieve its vision it is crucial for Novartis to earn and maintain the trust of all stakeholders. Novartis Group company (Novartis) associates and third parties retained by Novartis to lobby on behalf of the company should therefore be aware of all applicable regulations and be guided by the principles of responsible lobbying laid out in this Guideline, referencing the values of transparency, honesty and integrity.

1.2 Scope and Applicability

This Guideline applies to Novartis associates and third parties retained by Novartis to lobby on behalf of the company. These primarily include associates from Corporate Affairs and related functions¹.

1.3 Definition of lobbying

In the context of this guideline, 'Lobbying' describes interactions with policy makers and other external stakeholders with the intent to represent Novartis' perspective in the policy making process. Active contribution to policy making is an integral part of the democratic process and a legitimate activity as it enables the representation of different societal interests.

1.4 Roles and Responsibilities

Novartis associates and third parties retained by Novartis to lobby on behalf of the company must act in accordance with the principles and rules established in this guideline.

¹ The Country President and Heads of functions will be consulted to decide on the people in scope in the respective country and functions; lobbying in a market should be overseen by the Country President and, if applicable, by a local corporate affairs associate to ensure all associates engaged in lobbying are adequately trained.

2 Guidelines

2.1 Conducting lobbying activities responsibly (Anti-Bribery Policy – section 2.6)

Novartis engages in lobbying activities to provide policy makers with data and insights to enable widely informed decision-making conducive to improving patient outcomes and sustainable business.

Lobbying should not be misused for any corrupt or illegal purposes, or to improperly influence any decision. Relevant functions (e.g., Public & Government Affairs) provide guidance on how lobbying should be conducted based on the values of transparency, honesty and integrity.

2.2 Principles and rules for responsible lobbying

The vision of Novartis is to be a trusted leader in changing the practice of medicine. To achieve its vision it is crucial for Novartis to earn and maintain the trust of all stakeholders. The following principles should guide all Novartis lobbying activities:

Principle 1: Transparency, honesty and integrity are the core values reflected in how Novartis conducts lobbying.

Principle 2: All lobbying activities should enable widely informed decision making conducive to improving patient outcomes and Novartis sustainable business in pursuit of the company mission.

Principle 3: Novartis associates must not attempt to improperly influence any decision by inducing lobbied stakeholders to act or not to act in violation of their lawful duties.

Novartis associates and third parties retained by Novartis to lobby on behalf of the company should therefore be aware of all applicable regulations and apply the following rules:

1. Associates must not engage in activities intended to give rise to any obligations of the party receiving it or with the expectation of a direct or immediate return for the company or themselves²
2. Disclose to the stakeholder that lobbying is carried out on behalf of Novartis
3. Register in commonly-used voluntary lobbyists databases, in addition to mandatory registration, where applicable
4. Provide truthful and non-misleading information based on a sound understanding of the discussed issue
5. Apply due diligence when selecting third parties who will lobby on behalf of Novartis to ensure that such engagements are in line with all applicable policies
6. Seek clearance from HR and Legal before starting specific discussions of potential employment of former policymakers; HR and Legal will advise on what internal cooling-off period may be required

² See the Anti-Bribery Policy for more details on the variety of contexts where bribery issues may arise.

3 Implementation

3.1 Training

Novartis associates involved in Lobbying activities will receive the following trainings:

- Training on the “Responsible Lobbying” guideline: will be provided to all associates engaged in lobbying, in Corporate Affairs and related functions³, as part of the roll-out of the guideline
- Training on the Anti-Bribery Policy including a case study/training on “Responsible Lobbying” is provided for people working in Corporate Affairs, Market Access and any other related activities (self-identification)

A FAQ⁴ document on this Guideline providing more detailed guidance on the principles of Responsible Lobbying is available.

Additional trainings, supporting platforms and enforcement mechanisms may be determined on a case-by-case basis.

3.2 Breach of this Guideline

Breaches of these Guidelines will not be tolerated and can lead to disciplinary and other actions up to and including termination of employment.

³ The Country President and Heads of functions will be consulted to decide on the people in scope in the respective country and functions; lobbying in a market should be overseen by the Country President and, if applicable, by a local corporate affairs associate to ensure all associates engaged in lobbying are adequately trained.

⁴ FAQ: Frequently Asked Questions