

Novartis Argentina – Communication on Progress – 2007

Novartis Argentina signed the United Nations Global Compact (UNGC) in 2004 and has since been a strong supporter and an active participant in the local UNGC initiative.

The Novartis group supports the initiative and its ten principles globally. For Novartis Argentina, the UNGC represents a formidable opportunity to promote and increase local standards and enforce consistent legal principles, particularly with regard to human rights.

Novartis Argentina follows the group Code of Conduct (CoC) and Corporate Citizenship (CC) policy that support and enforce the protection of international human rights in particular. These documents, together with other group policies on insider trading, global codes of marketing and promotion, conflict of interest, financial integrity, are compulsory for all Novartis associates in Argentina. In 2007, approximately 90% of Argentine employees received training on those corporate policies and on how to report any related violation.

Principle 1 - Human rights: Businesses should support and respect the protection of internationally proclaimed human rights.

Commitment and policies

- Code of conduct, chapter 1: why a code of conduct? “Support of and respect for the protection of internationally proclaimed human rights.”
- Corporate citizenship policy: “We seek to promote and protect the rights defined in the Universal Declaration of Human Rights of the United Nations within our sphere of influence.”
- Corporate citizenship guideline 4 on human rights: “Novartis recognizes that the inherent dignity and the equal and inalienable rights of all members of the human family are the foundation of freedom, justice and peace. It therefore respects and supports the protection of human rights, as enshrined in the Universal Declaration of Human Rights (UDHR) issued by the General Assembly of the United Nations on December 10, 1948.”

Projects and activities

- Access-to-medicine global programs in collaboration with the World Health Organization (WHO) and other inter-governmental and non-governmental organizations to combat malaria, leprosy and tuberculosis in developing countries available upon request in Argentina.
- The Glivec International Patient Assistance Program (GIPAP), for our anticancer medicine *Gleevec/Glivec*, is one of the most far-reaching patient assistance programs ever implemented on a global scale. In developed countries, we also offer discounts and support programs to patients who lack medical insurance or cannot afford treatment. In Argentina around 5% of the patients who are prescribed Glivec® are in the GIPAP program and receive the medicine for free.

Novartis Argentina undertakes an array of social activities in order to support the protection of human rights in needy communities in the country. Each year, Novartis celebrates the Community Partnership Day throughout the world. In 2007, Novartis Argentina invited all associates to donate groceries, clothing, shoes, stationary, books, toys, etc. to four charity institutions dedicated to social work:

- 1) Juanito Foundation for children taken away from their homes due to violence and crimes.
- 2) “Manos Abiertas” Foundation, which owns two different institutions: first, Hogar Santa Ana, a house where nearly 60 elderly persons have

- lunch everyday and spend the day; second, Centro Beato Hurtado, a centre where more than 100 children receive scholar assistance, medical care, food and clothing.
- 3) Intimayo Center, where nearly 100 children and elderly people have dinner everyday.
 - 4) Garrahan House, the most important children hospital in Argentina. People from every Argentine province come to this hospital to have their children treated. Garrahan House offers shelter and food to poor mothers who come to the Hospital with their children. We also donated clothes, toys and baby articles.
 - 5) COR Foundation: it contributes to the detection of AIDs and improves the quality of life of infected children and adults. It is also active in the prevention of sexual infections and addictions. We also donated a freezer and a washing machine.
 - 6) "Todos juntos" Foundation: this NGO improves the living conditions of the poorest families based in the surroundings of Buenos Aires.
- o Nearly 100 people took part in the 2007 CPD in Argentina.
- Novartis has been sponsoring ADETRA (the Argentine Association for Transplant Sport Men) since 1996, supporting both the participation of the local delegation in the World Transplant Games (held internationally every 2 years) and the organization of the Argentine and Latin American Games.
 - Creating a permanent local medicine donation program
Novartis Argentina has been extensively involved in medicine donation and has supported several projects to facilitate access to healthcare for poor members of the Argentine community. The social situation in Argentina and the company's social responsibility guidelines led Novartis Argentina to the conclusion that a more formal and lasting system for drug donation was needed. The result of extensive research, consultation, and a three-way partnership is the Programa Novartis Comunidad, which offers access to free counseling, healthcare and medicines to qualifying community members. The program was launched in May, 2005. The Programa Novartis Comunidad is a permanent drug donation program facilitated by two Argentine NGOs, Cáritas Buenos Aires and Fundación Tzedaká, and Novartis Argentina. Qualifying participants are granted access to free counseling, medical orientation and medicines, allowing even the poorest members of society the chance to keep themselves and their families healthy and giving them the assistance they need to become self-sufficient.

Programa Novartis Comunidad offers a toll-free number for people interested in the program. After answering a brief questionnaire, each person is referred to a social worker at one of the two NGOs. The social workers analyze each case after meeting with each perspective participant and learning more about his or her situation. An attending physician examines each participant file/case, and offers medical orientation and medication free to those who meet the eligibility criteria, including the possibility of long-term care. Nearly all pharmaceuticals and OTC medicines are offered free of charge as part of the program. Those applicants who do not meet the program's criteria are redirected to other organizations that may better suit their individual needs.

The Program was launched in 2005 and more than 500 patients have benefited from it so far. In 2007, The Novartis Community Program was granted the 2007 Solidary Entrepreneur Award (*Premio al Emprendedor Solidario 2007*) by the Social Ecumenical Forum (*Foro Ecuménico Social*) in recognition for its contribution to improve community life conditions

and promote solidarity.

- Since 2006, Novartis Argentina has an internal policy to support the worklife balance of its associates. This policy includes several activities that allow employees to share more quality time with their families, such as the flexible time policy.
- Novartis Argentina associates are paid a “living wage”, i.e. a salary that is higher than the legal minimum wage for Argentina. They also have access to a special program which offers financial, psychological and legal counseling for free to them and their families.
- Novartis Argentina has been considered for 3 years in a row in the list of Great Places to Work in Argentina, always ranking among the top 50 companies. The company has also been recognized by Apertura magazine as one of the best employers for the last 3 years (# 3 in 2007).

**Additional
information**

- www.novartisfoundation.com
- www.nitd.novartis.com
- www.who.int/en/
- www.un.org
- www.blihr.org
- http://www.novartis.com/corporate_citizenship/en/ungc/principle_1.shtml

Principle 2 - Human rights: Businesses should make sure they are not complicit in human rights abuses.

- Commitment and policies**
- Code of conduct, chapter 4: non-discrimination: “Novartis will not tolerate discrimination” and chapter 9: compliance with the law: “Compliance with the law is an absolute requirement for Novartis and its employees. [...] Novartis is strongly committed to non-discriminatory and fair labor standards, to protecting the environment and to ensuring the health and safety of its employees.”
 - Corporate citizenship policy: “We do not tolerate human rights abuses within our own business operations.”
 - Corporate citizenship guideline 2 on fair working conditions
 - Corporate citizenship guideline 4 on human rights
 - Corporate citizenship guideline 5 on third party management
 - Corporate citizenship guidance note 5.1 on practical implementation and recommendations for corporate citizenship in 3rd party relations
- Projects and activities**
- Novartis Argentina enforces the protection of human rights, avoiding any kind of violation in the course of its normal business practices.
 - Novartis Argentina follows the group Third Party Management policy. We work closely with all suppliers/third party contractors to safeguard the inclusion of human rights in their business practices and policies. All third parties are classified annually in one of four categories according to their turnover with Novartis, the anticipated duration of the contract and the level of risks associated with their operations. Critical third parties are evaluated by a self-assessment and where applicable, the most critical third parties are visited by Novartis in order to learn about the level of compliance with our corporate citizenship principles. Follow-up visits are conducted on a regular basis. Novartis maintains the data received during this process for ongoing compliance evaluations. In cases where the results of the assurance visits and inquiries are unsatisfactory, Novartis assists the third party in developing an improvement program designed to raise the level of compliance with our Third Party corporate citizenship principles. If concerns persist regarding the commitment or capability of the third party to improve its corporate citizenship standards, Novartis evaluates as to whether special support should be provided or the contract terminated. If an agreed improvement program is not completed within three years, or if the respective audit results are not satisfactory, then the contracts are terminated.
 - For all our external providers, it is compulsory to follow the guidance established in our Corporate Citizenship policy and to adhere to the 10 principles of the UN Global Compact.
 - Novartis Argentina associates are paid a “living wage”, i.e. a salary that is higher than the legal minimum wage for Argentina. They also have access to a special program which offers financial, psychological and legal counseling for free for them and their families.

- E-training modules on ethics compliance (code of conduct, corporate citizenship, competition law, insider trading, conflict of interest, financial integrity, etc.) for all associates. In 2007, Novartis Argentina achieved a compliance rate between 85% and 100.
- Corporate Citizenship Ambassador Program: Novartis Argentina carried out 6 workshops in 2007 (involving 25% of employees) to train associates on the Novartis Corporate Citizenship initiatives and how to communicate them.

Additional information

→ www.novartis.com/corporate_citizenship/

Principle 3 - Labor standards: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

Commitment and policies

- Corporate citizenship policy: "We believe in constructive dialogue between employer and employees and support the principle of freedom of association."
- Corporate citizenship guideline 2 on fair working conditions, point 8 on freedom of association: "Novartis recognizes that each employee has the right to choose whether to join a trade union or employee association. Novartis companies shall give trade unions a fair chance to compete for unionization of employees and shall be comfortable with collective bargaining arrangements, individual arrangements, or a mixture of the two."
- Corporate citizenship guideline 5 on third party management, point 12 on freedom of association: "Third parties shall respect the right of each employee to join a trade union or an employee association. They shall give trade unions a fair chance to compete for the unionization of employees and shall be comfortable with collective bargaining agreements, individual arrangements or a mixture of both. "

Projects and activities

- The Novartis group supports the right to free association among employees and collective bargaining, favoring a constructive dialog and communications among stakeholders, the employer and employees.
- In Novartis Argentina, there is no ruling or policy that stops our associates from forming any kind of workers association or presenting a collective negotiation or labor request.
- Novartis Argentina is in line with this principle and with the local regulations, where we allow every associate to be part of a union or any kind of workers association.
- At Novartis Argentina, associates know and are aware that according to the Constitution, there is in Argentina the right to freedom of association, which is also implicit in the Corporate Citizenship policy and the local Labor Regulations.

- On a monthly basis, the Country Pharma Organization and part of senior management of Novartis Argentina hold meetings with all employees. In 2007, several open space discussions with the Head of Novartis Argentina were also held.
- Channels to ensure effective communication with the Union are active, such as, meetings with Union representatives and HR representatives or other managers and a special Union internal board on Novartis premises.
- Novartis Argentina actively interacts with unionized personnel in order to be open to their requests and demands and solve them effectively. Human Resources is in charge of ensuring a good relation with the Union. Several events and meetings between the Union and Novartis take place during the year.
- In 2007, Novartis Argentina participated in the Initiative for Social Responsibility and Decent Labor, carried out by the National Ministry of Labor, Employment and Social Security. This initiative was sponsored by the UNDP, the International Labor Organization and the Economic Commission for Latin America and the Caribbean. It aims at promoting decent labor, eradication of child labor and support to young workers. As part of this initiative, Novartis Argentina participated in a working group on "New contents of the collective bargaining" and how to include Social Responsibility aspects in collective bargaining. The working group presented several initiatives, one of which was the creation of a Good Practices bank, into which Novartis Argentina included an own case study.

Additional information

Principle 4 - Labor standards: Businesses should uphold the elimination of all forms of forced and compulsory labor.

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| Commitment and policies | <ul style="list-style-type: none"> • <u>Code of conduct</u>, chapter 9: compliance with the law: "Novartis is strongly committed to non-discriminatory and fair labor standards, to protecting the environment and to ensuring the health and safety of its employees." • <u>Corporate citizenship policy</u>: "We do not tolerate forced labor and other forms of exploitative labor." • <u>Corporate citizenship guideline 2</u> on fair working conditions, point 9 on forced, compulsory and bonded labor: "Novartis will not engage in forced, compulsory or bonded labor." • <u>Corporate citizenship guideline 5</u> on third party management, point 10 on forced, compulsory and bonded labor: "Third parties shall exclude the use of forced, compulsory or bonded labor." |
| Projects and activities | <ul style="list-style-type: none"> • The Novartis group prohibits forced labor of any kind |

under the influence of undue pressure, without an individual's own will.

- Novartis Argentina offers to all associates a fair work contract that establishes clear terms and conditions to perform a designated job. The contract also mentions penalties for associates if they fail to show for work or do not comply with their responsibilities.
- All Novartis Argentina employees are hired according to local regulations and internal policies.
- Novartis Argentina expects all third party manufacturers and suppliers not to resort to forced labor or impose a work unwillingly on their workers. In order to create a commitment on this point and on all 10 Global Compact principles, Novartis Argentina includes a Global Compact letter (to be signed by the third party) in the requirements to become one of its suppliers.
- In 2007, Novartis Argentina participated in the Initiative for Social Responsibility and Decent Labor, carried out by the National Ministry of Labor, Employment and Social Security. This initiative was sponsored by the UNDP, the International Labor Organization and the Economic Commission for Latin America and the Caribbean. It aims at promoting decent labor, eradication of child labor and support to young workers. As part of this initiative, Novartis Argentina signed the Declaration of Principles and Guidelines on Social Responsibility and the promotion of Decent Labor. This document states that Social Responsibility is the company's commitment to carry out actions and policies to increase employment rates, improve employment conditions and extend and improve social protection, among others.

Additional information

→ www.novartis.com/corporate_citizenship/

Principle 5 - Labor standards: Businesses should uphold the effective abolition of child labor.

- Commitment and policies**
- Code of conduct, chapter 9: compliance with the law: “Novartis is strongly committed to non-discriminatory and fair labor standards, to protecting the environment and to ensuring the health and safety of its employees.”
 - Corporate citizenship policy: “We support programs to abolish child labor in a manner consistent with the basic interests of the child.”
 - Corporate citizenship guideline 2 on fair working conditions, point 10 on child labor: “Novartis will not use child labor.”
 - Corporate citizenship guideline 5 on third party management, point 11 on child labor: “Third parties shall exclude exploitative child labor. [...] Programs to abolish child labor in a manner consistent with the basic interests of the child should be supported. ”

- Projects and activities**
- The Novartis group supports and enforces the practice of not hiring minors.
 - Novartis Argentina does not hire minors. The minimum hiring age in the country is 18 years.
 - In 2004, Novartis Argentina signed the local Declaration of Argentine Companies against Child Labor, as a result of the program “Adoption of a declaration against the child labor in Argentina: an answer from the leading companies”, sponsored by the International Labor Organization Office in Argentina.
 - In 2007, Novartis Argentina participated in the Initiative for Social Responsibility and Decent Labor, carried out by the National Ministry of Labor, Employment and Social Security. This initiative was sponsored by the UNDP, the International Labor Organization and the Economic Commission for Latin America and the Caribbean. It aims at promoting decent labor, eradication of child labor and support to young labor. As part of this initiative, Novartis Argentina signed the Agreement for the prevention and eradication of child labor, in accordance with the Global Compact principles and the Millennium Development Goals.

Additional information → www.novartis.com/corporate_citizenship/

Principle 6 - Labor standards: Businesses should uphold the elimination of discrimination in respect of employment and occupation.

- Commitment and policies**
- Code of conduct, chapter 4: discrimination: “Novartis will not tolerate discrimination or harassment based on race, religion, creed, national origin, sex, disability, age or any other relevant

category.”

- Corporate citizenship policy: “The Novartis core values are based on the fundamental rights of every individual [...], such as nondiscrimination [...]. We base our human resources policies and practices on fairness [...].”
- Corporate citizenship guideline 2 on fair working conditions, point 11 on non discrimination: “Novartis will not tolerate discrimination based on personal characteristics that are not inherently relevant to the performance of a job. Such characteristics include race, color, sex, religion, political opinion, national extraction or social origin or any other characteristic protected under local law. [...] Each Novartis company shall ensure equitable treatment among its employees in terms of basic employment terms, advancement possibilities, paid holidays granted, occupational safety and health, access to training and vocational guidance, and all other material terms and conditions of employment.”
- Corporate citizenship guideline 5 on third-party management, point 13 on non discrimination: “Third parties shall avoid discrimination based on personal characteristics such as race, color, sex, religion, political opinion, national extraction or social origin or any other characteristic protected under local law. They shall protect all employees against harassment in the work place, including sexual harassment.”

Projects and activities

- The Novartis group champions the elimination of any kind of discrimination regarding differentiation, exclusion or preference in relation with gender, color, religion, social status, political affiliation or nationality.
- In Novartis Argentina there are no practices that stimulate discrimination of any kind.
- The interviewing and hiring processes are clear and transparent. For the promotion, training and salary increases of our associates, there are guidelines to avoid discrimination and favor transparency about the opportunities available for associates and their career advancement.
- Novartis Argentina expects that all third party manufacturers and suppliers of external services have in their policies and procedures non-discriminatory guidelines, as stated in the conditions to become a Novartis Argentina supplier.
- Novartis Argentina is committed to avoiding any kind of discrimination, or harassment and to promoting diversity. Efforts have been done to inform and train all associates about this topic to ensure compliance.
- In 2005, the Novartis group established a Business Practices Office (BPO), meant to receive complaints from associates and stakeholders related to violations to human rights, discrimination or any kind of harassment, misconduct or any violation to our guidelines and policies. Reports to the BPO can be addressed by mail or by phone to ‘the integrity line’. All complaints reported to the BPO are duly investigated and results are provided to the business unit head to take corresponding corrective actions. Lessons learned are also considered to strengthen controls.

- Since 2006, a Diversity and Gender Equality Policy is implemented to ensure proper compliance.

Additional information

- www.pharma.us.novartis.com
- www.novartis.com/corporate_citizenship/

Principle 7 - Environment: Businesses should support a precautionary approach to environmental challenges.

Commitment and policies

- Code of conduct, chapter 9: compliance with the law: “Novartis is strongly committed [...] to protecting the environment and to ensuring the health and safety of its employees.”
- Corporate citizenship policy: “We take a precautionary approach in the innovation and development of new products and technologies. To this end, we follow a step-by-step approach, we engage in scientific peer review, and we consider benefits and risks of innovation in a scientific and transparent manner.”
- Novartis position on precautionary principle: “The company applies the precautionary approach wherever a significant threshold of plausibility for a potential risk is reached and when science does not give a clear-cut answer on that potential risk. [...] When an activity or a product poses a threat of serious or irreversible damage to the environment, precautionary measures are considered even if cause-effect relationships are not fully established scientifically. However, the precautionary approach needs to remain science-based in order to ensure continued innovation.”
- HSE guidelines: HSE management (#1); emergency management (#2); HSE in development and production (#3); biosafety (#4); warehousing (#6); hazardous waste management (#7); transportation (#11)
- HSE guidance notes: risk portfolio (1.1); performance management (1.2); and energy management (1.3)

Projects and activities

- The Novartis group supports environmental regulations and preventive guidelines all over the world.
- Novartis Argentina regularly evaluates potential environmental damages. There is a portfolio of potential risks that are communicated to group management, as often as required.
- In 2006 and 2007, Novartis Argentina focused its Business Continuity Management (BCM) efforts on pandemic preparedness (reviewed by a group audit). The auditors recognized the high commitment toward pandemic preparedness and concluded that the organization’s level of preparedness toward the end of 2006 should be able to manage a pandemic outbreak.
- Novartis Argentina’s main office was built in accordance to

several environmental guidelines:

- Many green existing spaces in the field were preserved as a way to respect original afforestation in the place.
- The company decided not to occupy the whole available surface in the field, so green surrounding areas are preserved.
- Novartis Argentina replaced the extinguishing system fueled by Halon 1301 gas with another one using FM200, an ecological gas which doesn't damage the ozone layer.
- To water green areas, the system uses the water coming from the underground sheets of water in order to preserve drinkable water.
- Novartis Argentina generates its own energy, thus safeguarding public energy.

Additional information

➔ www.novartis.com/corporate_citizenship/en/hse.shtml

➔ www.novartis.com/about_novartis/en/ethics_committee.shtml

Principle 8 - Environment: Businesses should undertake initiatives to promote greater environmental responsibility.

Commitment and policies

- Code of conduct, chapter 9: compliance with the law: "Novartis is strongly committed [...] to protecting the environment and to ensuring the health and safety of its employees."
- Corporate citizenship policy: "We want to be a leader in Health, Safety and Environmental Protection (HSE). [...] We strive to make efficient use of natural resources and minimize the environmental impacts of our activities and our products over their life cycle. We assess HSE implications to ensure that the benefits of new products, processes and technologies outweigh remaining risks. We periodically review such assessments in light of new concerns or evidence."
- Corporate citizenship guideline 5 on third party management, point 7 on principles and expectations: "Novartis gives preference to third parties that share the societal and environmental values required by the Global Compact."
- Corporate citizenship guideline 5 on third party management, point 15 on health, safety and protection of the environment: "Third parties shall provide a safe work place for their employees to prevent accidents and injury to health. At a minimum, third parties shall comply with all applicable local health, safety and environmental protection laws and regulations."
- HSE guidelines: HSE management (#1); Novartis emergency management (# 2); HSE protection in development and production (#3); bio-safety (# 4); occupational health (#5); warehousing (#6); hazardous waste management (#7); selection and management of third party contractors (#8); incident reporting and learning (#9); setting and reviewing provisions for environmental liabilities (#10); transportation (#11); and business continuity management (#12)
- HSE guidance notes: risk portfolio (1.1); performance management (1.2); and energy management (1.3)

- Projects and activities**
- The Novartis group enforces Health, Safety & Environment (HSE) policies and guidelines globally.
 - Novartis Argentina strictly follows the group HSE policies and guidelines as well as the regulations issued by the Environmental Ministry. This guarantees the implementation of programs for optimal waste disposal management, transport of dangerous items and sewage disposal of residues. At the same time, we monitor key indicators such as water consumption and employee training on the proper use of natural resources such as water and energy.
 - Recycling is a top priority and all associates of Novartis Argentina are encouraged to participate in recycling programs at work. Novartis Argentina has been participating for the last 10 years in a variety of paper and ink cartridges recycling programs. In 2007, nearly 9,000 kg of paper were given to these programs.

- Additional information**
- ➔ www.novartis.com/corporate_citizenship/en/hse.shtml
 - ➔ <http://unfccc.int/2860.php>

Principle 9 - Environment: Businesses should encourage the development and diffusion of environmentally friendly technologies.

- Commitment and policies**
- Corporate citizenship policy: "We strive to make efficient use of natural resources and minimize the environmental impacts of our activities and our products over their life cycle. We assess HSE implications to ensure that the benefits of new products, processes and technologies outweigh remaining risks."
 - Corporate citizenship policy: "We give priority to business partners, suppliers and contractors who share our societal and environmental values, and we support their efforts to promote these values through their business activities."
 - Corporate citizenship guideline 5 on third-party management, point 23 on improvement programs and special support: "Novartis may assist the third party in developing an improvement program designed to raise the level of compliance with the third party corporate citizenship principles."

- Projects and activities**
- The Novartis group supports the implementation and the wide application of new technologies that are environmentally friendly. Yet, there are no manufacturing facilities belonging to Novartis Argentina.
 - The main office of Novartis Argentina was built in accordance with stringent environmental guidelines:
 - Many green existing spaces in the field were preserved as a

- way to respect original afforestation in the place.
 - The company decided not to occupy the whole available surface in the field, so green surrounding areas are preserved.
 - Novartis Argentina replaced the extinguishing system fueled by Halon 1301 gas with another one using FM200, an ecological gas which doesn't damage the ozone layer.
 - To water green areas, the system uses water coming from the underground sheets of water in order to preserve drinkable water.
 - Novartis Argentina generates its own energy, thus safeguarding public energy.
- Recycling is a top priority and all associates are encouraged to participate in recycling programs, at work. Novartis Argentina has been participating for the last 10 years in a variety of paper and ink cartridges recycling programs. In 2007, nearly 9,000 kg of paper were given to these programs.

→ www.novartis.com/corporate_citizenship/en/hse.shtml

Additional information

Principle 10 - Anti-corruption: Businesses should work against corruption in all its forms, including extortion and bribery.

- Commitment and policies**
- Code of conduct: chapter 6: Bribes, business entertainment, gifts: "No employee shall make any payment, or kickback, or offer improper financial advantage to an official of a government or a government-controlled entity for the purpose of obtaining business or other services, as set out in the OECD Convention on Combating Bribery of Foreign Public Officials. [...] Third parties must not be used to circumvent any of the policies mentioned above."
 - Corporate citizenship guideline 3 on business ethics – bribes, gifts and entertainments.
 - Marketing codes established for each division and for the Consumer Health business units. The intent behind the marketing codes is to secure the credibility and integrity of Novartis in worldwide healthcare by ensuring that promotion to healthcare professionals and the general public is conducted in an ethical and balanced manner, supported by accurate and relevant information and in accordance with local regulations.

- Projects and activities**
- The Novartis group works permanently against corruption of all kind, including extortion and bribery.
 - In addition to the Code of Conduct, Corporate Citizenship policy and Conflict of Interest policy, the Novartis group has developed global guidance on grants and marketing and promotional practices codes for each of its organizational units. These codes ensure compliance with local regulations and protect the integrity of Novartis. They are meant to align promotional practices with high ethical standards and favor responsible product promotion with physicians.
 - In 2005, the Novartis group established a Business Practices Office (BPO), meant to receive complaints from associates and stakeholders related to fraud, conflict of interest, corruption, misconduct or any violation to our guidelines and policies. Reports to the BPO can be addressed by mail or by phone to 'the integrity line'. All complaints reported to the BPO are duly investigated and results are provided to the business unit head to take corresponding corrective actions or sanctions. Lessons learned are also obtained to strengthen controls. Novartis Argentina has its own Compliance Officer and also its Integrity Line (0800 666 0078).
 - Associates of Novartis Argentina receive regular training on corporate policies and marketing codes, where guidelines are clearly defined regarding corruption issues.

Additional information

- www.eoa.org/
- www.celc.executiveboard.com
- www.ifpma.org
- www.oecd.org
- www.iccwbo.org/policy/anticorruption/

