

# Novartis India Corporate Policies

## Code of Ethics

Based on our commitment to reimagine medicine and extend patient lives, the Code of Ethics is our core principles towards all our stakeholders

## Familiarization program for Independent Directors

Keeping the Board of Directors informed on industry and regulatory updates and their roles and responsibilities

## Vigil Mechanism and Whistle-blower policy

A mechanism that enables Directors and employees to report genuine concerns

## CSR

Provides guidance on the vision, principles and governance of CSR initiatives

## CSR Policy - Novartis India Limited

## Details of NIL CSR Projects FY 2022-23

## Details of NIL CSR Annual Action Plan FY 2022-23

## CSR Policy - Novartis Healthcare Private Limited

## Details of NHPL CSR Projects FY 2022-23

## Details of NHPL CSR Annual Action Plan FY 2022-23

## Business Responsibility and Sustainability Reporting (BRSR)

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.

## Nomination and Remuneration Policy

Guidelines on selection, nomination, appointment and remuneration of Directors, Key Managerial Personnel and Senior Management Personnel of the Company

## Dividend Distribution Policy

Guidelines for declaration/recommendation of dividends

## Policy for dealing with Related Party Transactions

Defines standards/procedures and disclosures while dealing with Related Party Transactions

## Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

Code aims to ensure timely disclosures of unpublished price sensitive information which may impact the stock prices

## Code of Conduct for Designated Persons and their immediate relatives

Defines code of conduct to regulate, monitor and report share trading by Designated Persons and their immediate relatives

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#### Policy for Determination of Materiality for any event or information

Defines standards on disclosure of material events and transactions to the investors

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#### Policy for Prevention and Prosecution of Acts of Sexual Harassment at Workplace

Guidelines to prevent and prosecute acts of sexual harassment at the workplace.

#### Constitution of ICC - NIL and NHPL

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#### Policy for Preservation of Documents

Defines the principles to be followed for effective maintenance and preservation of documents of the Company

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#### Board Diversity Policy

The Policy is to provide a framework for leveraging on the differences within the expertise of the Board, offering a broad range of perspectives that are directly relevant to the business.

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#### Investor Servicing And Grievance Redressal Policy

The Policy outlines the type of queries that investors can raise; escalation matrix for resolving day to day queries of investor; and timelines for resolving different queries.

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