NOVARTIS | Reimagining Medicine

EFPIA Disclosure Code: 2022 Self-certification Scheme

Healthcare professionals (HCPs) and healthcare organizations (HCOs) with whom Novartis Pharma AG works provide the pharmaceutical industry with valuable, independent and expert knowledge derived from their clinical and management experience. As owners of scientific knowledge and experts in medicinal products, pharmaceutical companies can be a unique resource to the healthcare systems and providers, which will ultimately benefit the patients.
In the same way, the pharmaceutical industry works with Patient Organizations (POs), this collaboration is essential in addressing patient needs. POs have a key role in helping to shape, develop and define the outcomes that make the most difference to patients.

EFPIA and its member associations have adopted codes and guidelines to ensure that the interactions of their member companies with HCPs, HCOs and POs meet the high standards of integrity and transparency. Building greater transparency to the relationships between pharmaceutical companies and HCPs/HCOs/POs aims to building understanding of the collaboration and recognition of its value to patient care.

Except in countries where disclosure is prescribed by laws, Novartis Pharma AG hereby confirms that its disclosures of transfers of value (ToVs) to HCPs, HCOs and POs made in 2021 have been reported in application of the EFPIA Code following key principles:

Disclosure quality

Novartis Pharma AG certifies that:

- Its disclosures are made in each country covered by the EFPIA Code where it operates
- Its disclosures include direct and indirect ToVs, as defined in the Code and associated guidance issued by EFPIA
- Its Methodological Note describes the process it has followed in order to compile the data hereby disclosed

Methodology used for the collection and organization of ToVs is in line with the EFPIA Code's requirements and applicable codes

Novartis Pharma AG certifies that:

- Data collection complies with the requirements of the EFPIA Code
- Actions are taken to ensure individual disclosure for HCPs and HCOs' transfers of values (each as defined in the EFPIA Code)

Aggregate disclosures are limited to Research and Development ToVs and such HCPs/HCOs' ToVs that cannot be disclosed on an individual basis for legal reasons

Novartis Pharma AG certifies that aggregate disclosure is limited to the following topics:

- Research and Development Transfers of Value (as defined in the EFPIA Code)

- Transfers of Value to Recipients that have opposed to the publication on grounds of the protection of their private data
- If an HCP or HCO (where applicable) has provided consent to individual disclosure only in respect of part of the Transfers of Value he/she/it received, all Transfers of Value to such HCP or HCO (where applicable) are being disclosed in the aggregate

Ensuring compliance with Data Privacy Obligations

Novartis Pharma AG certifies that its disclosure complies with the Data Privacy obligations.

Date: 7th June 2022

Name of signatory:
Marie-France Tschudin

Position in the Company:
President, IM Int & Chief Commercial Officer

Signature: