

CORE

Sandoz Global Policy for External Professional Interactions

Document Owner: Corporate Ethics and Compliance

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1. General Information

1.1. Purpose

At Sandoz, we pioneer access for patients. We aspire to be the leading and most valued generic and biosimilar company in the world. Doing what is right for our patients, society, and our company is a key pillar of our culture, as embedded in our Code of Ethics.

The CORE Policy expands upon our Code of Ethics by setting standards for ethical and compliant external professional interactions. The Policy is supported by three Guidelines which establish specific requirements and controls for different types of activities in scope.

1.2. Scope and Applicability

1.1.1. Scope

The scope of this Policy includes all external professional interactions with actual or perceived risk of bribery, undue influence, unethical business practices. The Policy covers activities related to all types of Sandoz products including biosimilars, prescription (Rx), over-the-counter (OTC) and food supplements, as well as non-product related activities.

1.1.2. Applicability

The Policy and the supporting Guidelines are applicable to all Sandoz Associates globally except for those based in the United States (US). US-based Associates must follow local Policies for all activities related to their market. Third Parties undertaking activities on behalf of Sandoz must adhere to the same standards as defined in the Policy and Guidelines.

1.3. Roles and Responsibilities

All Associates are responsible to decide, act and lead ethically, and are accountable for adhering to ethical standards, external requirements, internal Policies and Guidelines in all external professional interactions. The following specific roles and responsibilities are defined:

Role	Responsibility
Activity Owner	<ul style="list-style-type: none">Accountable for compliance with applicable internal and external requirements.Assesses, owns, and manages risks associated with the activity, including activities delivered by a Third Party.
Activity Owner's Manager (Approver)	Where relevant from a risk-perspective, confirms that: <ul style="list-style-type: none">There is a legitimate need for the activity.Associated risks have been considered and appropriately managed, and the activity is compliant with relevant Policy and Guidelines.
Subject Matter Expert (SME) – SME Reviewer	<ul style="list-style-type: none">Advises on identification and management of the associated risks in their area of expertise. If respective function is not present at the local level, above-country representative of the relevant function must be involved. Where Activity Owner is a representative of the function listed as SME, additional review by the same function is not required.

1.4. Principles

Maintaining high standards of ethical business conduct is a commitment embedded in our Code of Ethics. The following principles help us stay aligned with this commitment when engaging professionally with external stakeholders:



Clarify the need and objectives



Observe applicable internal and external requirements



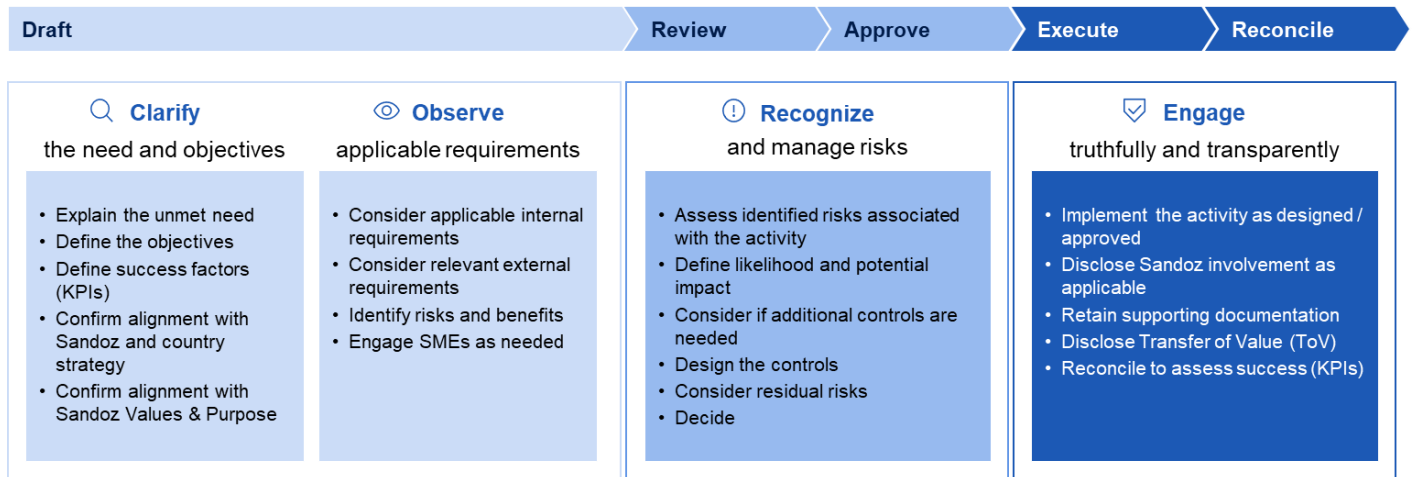
Recognize and manage risks



Engage truthfully and transparently

These principles serve as a basis for all external professional interactions. The CORE Guidelines further define key requirements, controls and approval process for types of activities grouped according to their nature and associated risks, into **Events and Programs, Professional Services** and **Content and Contributions**. If applicable external requirements are more restrictive than those established in this Framework, the more stringent ones must be applied.

All external professional interactions in scope of CORE Policy and Guidelines must be managed according to the following **Activity Lifecycle**:



When planning an external professional activity not specifically described by CORE Framework, Activity Owner must ensure that the activity is in line with the CORE Principles and managed according to the Lifecycle above.

2.CORE

2.1. Events and Programs

Sandoz may organize **Events** or participate in **Third Party Owned Events** with promotional, scientific, educational, external policy shaping, advice seeking or other professional purposes. Such events may be conducted in-person, virtually, or in a hybrid format for different target audiences including Healthcare Professionals (HCPs), patients, general public, policy makers, or other healthcare stakeholders.

Sandoz may conduct **Primary Market Research** to gain and analyze structured insights on medical, scientific, product-related and other business-relevant topics from multiple respondents such as HCPs, patients, consumers and other stakeholders.

Sandoz may organize **Patient Support Programs (PSPs)** to improve overall patient health outcomes by educating patients or a caregivers about the disease, medication or treatment administration or to support access, diagnosis, usage, adherence to medicinal products.

Sandoz may implement **Digital Health Solutions (DHS)** such as tools, applications, Third Party or Sandoz own platforms, etc. These initiatives integrate digital technologies, data, and healthcare expertise to enhance healthcare delivery, improve patient journey and patient outcomes.

Sandoz may organize **Promotional Programs** such as direct-to-consumer sampling, distribution of consumer items, Sandoz product coupons or participation prizes, social media and blogging campaigns. The objective of these programs is to increase sales, raise product awareness and contribute to brand building and recognition.

Sandoz may organize or fund **Preceptorship Programs** to enhance HCP's education and experience through practical training.

Sandoz may collaborate with reputable stakeholders for a shared purpose to strengthen healthcare systems, enhance patient care and patient experience, or address barriers to ensure patients have access to the most effective treatment. All parties involved in **Collaborative Working Agreements** play an active role and collaborate to achieve shared objectives.

2.2. Professional Services

Sandoz may engage qualified Experts and Partners for legitimate **Professional Services**. Experts include HCPs, Healthcare Organizations (HCOs), Patients and Patient Organizations, and other types of individuals such as government officials, individuals with public platforms (e.g. influencers, bloggers etc.). Partners include HCOs (pharmacies, hospitals), retail stores, distributors with pharmacy networks and other customers.

2.3. Content and Contributions

Sandoz may create and disseminate **Promotional and Non-Promotional Content** to external audiences in various formats with informational, educational, and promotional purposes.

Sandoz may provide free of charge or demonstrate **Samples** of Medicinal Products to HCPs or other authorized recipients to familiarize themselves with the product.

Sandoz may occasionally provide **Items of Medical Utility** (IMUs) to HCPs or HCOs to enable delivery of healthcare or enhance patient experience via education.

Sandoz may provide **External Funding** (grants, sponsorships, membership fees, etc.) to legitimate reputable external organizations to improve healthcare, advance scientific knowledge and support medical education.

3. Exception Process and Violations

3.1. Exceptions

Compliance with applicable external requirements must be maintained at all times. Exceptions to requirements outlined in this Policy and supporting Guidelines must be approved in accordance with the Enterprise Policy Management (EPM) Exception Process as follows:

- For Legal or Regulatory reasons: approval by Country Legal & Compliance Head and Region Legal & Compliance Head is required.
- For other business reasons: approval by Country Legal & Compliance Head, Country Head and Global Head of the Function where the exception is required.

All approved exceptions must be recorded in EPMs Central Exception Register File.

3.2. Violations

In alignment with our Code of Ethics, breaches of this Policy can result in remedial, corrective, or disciplinary actions up to and including termination of employment. Actual or suspected incidents of misconduct should be reported to the SpeakUp Office. Sandoz guarantees non-retaliation and confidentiality, to the extent legally possible, for good-faith reports of such breaches.