

Novartis COVID-19 Good Practice Guidance for Third Parties

Version 1

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To: NOVARTIS THIRD PARTY MANAGEMENT

From: Ethics, Risk & Compliance (ERC) - Human Rights & Third Party Risk Management

Introduction

The COVID-19 pandemic presents a challenging situation for Novartis and its business partners. We must continue to ensure an uninterrupted supply of essential medicines to patients, which requires that any disruption to our supply chains be avoided or minimized. At the same time, we have a responsibility to ensure that the production of Novartis medicines does not cause or contribute to adverse impacts on the health and safety, labor rights or other human rights of Novartis associates or workers in our supply chains as a result of the COVID-19 pandemic.

In order to achieve both these objectives to the greatest extent possible, based on the most up-to-date World Health Organization (WHO) technical guidance information in relation to COVID-19, we are providing this Guidance to suppliers on recommended good practices during the COVID-19 pandemic. We emphasize that this Guidance contains recommendations only and is neither mandatory nor contractually binding. Suppliers are encouraged to implement this Guidance in addition to any local legal requirements or guidance regarding COVID-19. Where this Guidance conflicts with local law or recommendations regarding COVID-19 health and safety and/or labor practices, suppliers must comply with local law and guidance.

This Guidance is based on emerging but evolving internationally-recommended COVID-19 good practice. As such, this Guidance may be reviewed and reissued based upon best available knowledge in relation to the pandemic.

Physical Distancing

- Ensure all on-site workers keep at least 1 meter (3 feet), and preferably 2 meters (6 feet), apart at all times (except for contractors who work alongside Novartis associates on Novartis sites, who must maintain a 2-meter (6 feet) physical distance). Where work functions make this impossible, provide the relevant workers with appropriate facemasks and other protective measures (e.g. gloves, hand-sanitizer or other appropriate disinfectant, etc.).
- Stagger lunch and coffee breaks to avoid large gatherings of workers in the same location, in order to maintain the above indicated physical distancing – ideally, groups at one table should be no larger than 5 persons – if not possible to minimize large gatherings in one place, disperse workers to other appropriate locations around the worksite for lunch and coffee breaks.
- Where feasible, provide a one-hour gap between the end of one shift and the beginning of the next in order to avoid contact between outgoing and incoming workers – disinfect frequently touched surfaces in the worksite during this one-hour shift transition period. Where feasible, conduct shift handover by virtual means (e.g. by using internal landlines or cell phones).
- Where transport to or from worksite is provided to workers, provide additional transport vehicles to avoid workers being required to sit or stand closer than the minimum physical distancing (preferably 2 meters, but at least 1 meter).
- Instruct workers to avoid use of public transit during peak hours, where possible – where job functions allow, request workers to work flexible hours to avoid peak transit and workplace hours.
- Where possible, and as permitted by local laws and regulations, reorganize shift arrangements and/or workers' total work days to minimize number of workers on-site at any one time (e.g. allocate weekly work hours over fewer days to reduce commuting to/from work, reduce size of shift workforce to minimum required, etc.).
- Wipe down frequently touched surfaces in common areas on a regular basis (i.e. desks, lunchrooms, washrooms, locker-rooms, worker transport, dormitories / worker accommodation, and elevators) with cleaning products that contain ingredients known to be effective against COVID-19, such as those listed [here](#).

- Allow staff whose on-site presence is non-essential to work remotely, where practicable.
- Instruct workers to avoid and minimize touching face, nose or eyes – with especial attention by those workers wearing facemasks.

Personal Hygiene

- Display posters demonstrating good personal hygiene in prominent locations throughout worksite (see this [poster](#) for recommended content, or visit the [WHO](#) website).
- Provide adequate water and sanitation facilities to enable workers to wash hands thoroughly with soap and water for at least 20 seconds. Instruct workers to do so frequently. Where access to adequate water and sanitation is not possible, provide workers with alcohol-based hand-sanitizer (minimum 60% alcohol content).
- Prohibit shaking hands on work premises and instruct workers to avoid all other unnecessary physical contact.
- Instruct workers to sneeze, cough, or spit into a tissue or their elbow, and dispose of tissues immediately in proper waste receptacles.

Compliance with Novartis Third Party Code

- Suppliers must continue to comply with the Novartis Third Party Code (NTPC) during the COVID-19 pandemic.
- Where fulfilment of contractual obligations to Novartis (e.g. demand for increased delivery of product, shortened deadlines, etc.) puts compliance with the NTPC at risk due to COVID-19 impacts (government emergency measures, reduced workforce, disruption of supplier's supply chains), suppliers are requested to notify your Novartis contact immediately so that potential mitigation measures can be identified and implemented collaboratively.

Respect for Labor Rights

- The employers of 3rd party service providers, who are usually required to work onsite at a Novartis location (i.e. employees of external service providers, classified in HR Core as “Z9”; and contractors classified in HR Core as “Z7”) should provide the same or similar support that is available to Novartis associates, where it is legally possible and applicable.
- This should include items such as:
 - Access to home office/remote work when this is feasible or available to ensure business continuity;
 - Ability to care for dependent relatives (e.g., children or spouse);
 - Access to on-site medical facilities where applicable.
- Respect workers' right to paid sick leave – be flexible in requiring proof of sickness (e.g. do not require workers to provide medical certificates for absences less than 5 days), offer paid sick leave to workers if not already required by law
- Respect workers' right to reasonable working hours, including maximum standard working hours and overtime, and 24 consecutive hours of rest in every 7-day period. Deviation from the NTPC standards regarding these provisions should only be in accordance with local emergency legislation.

Respect for Health and Safety

- Require all workers to thoroughly wash their hands upon entry onto factory premises.
- Instruct workers to stay at home and report in sick if they are experiencing flu-like symptoms (especially fever, dry cough, or shortness of breath).
- Allow high-risk workers who self-identify to work from home, or where this is not possible, place them on paid leave (i.e. workers older than 65 years of age, workers with relevant pre-existing medical conditions (cancer, cardiovascular disease, chronic respiratory diseases, conditions/therapies that weaken the immune system, diabetes, high blood pressure).

Dormitories and Worksite Accommodation

- Apply the same above recommendations regarding physical distancing, good personal hygiene, and health and safety in dormitories and other worker accommodation.
- Limit the number of workers per bedroom to ensure required physical distancing.
- Increase or upgrade water and sanitation facilities to enable adequate personal hygiene and ensure necessary physical distancing.

Migrant Workers

- Take special attention to respect the labor rights and health and safety of workers who come from outside the country or region of the worksite, and who may be especially vulnerable due to lack of knowledge of local language or laws. Ensure that migrant workers fully understand instructions, warnings and symbols related to health and safety and C-19 (e.g. use easily-understood health and safety symbols and / or make information available in all worker languages).
- Do not return migrant workers who have been admitted on a permanent basis, or their family members, to their home countries or regions solely on the basis that the worker is unable to fulfill work functions due to illness (including COVID-19) contracted subsequent to, unless the worker concerned requests so.
- Allow workers who wish to return to their home country or region to do so voluntarily, and provide them with direct access to their identity and travel documents at all times to enable them to do so.
- Collaborate with authorities in workers' home and host countries or regions to financially support migrant workers whose employment has ended but are unable to return home due to travel restrictions.
- Where workers or their families may be expelled due to COVID-19, collaborate with local authorities to financially support workers, including paying all or some of their costs for returning to their home countries or regions.

Further Information

- For further information on COVID-19 good practice for employers, visit the WHO guidance "**Getting your workplace ready for COVID-19**" at this [link](#)