

*Roche Group*  
***Policy on Safety, Security, Health and  
Environmental Protection (SHE)***

2021 Edition

*Roche's Corporate Principles express our vision of the company we strive to be: an innovative company which enjoys the pride of its employees and deserves the lasting trust of its partners. In particular Roche commits itself to the Safety, Security, Health & Environmental principles and practices as set forth in the Roche Group Code of Conduct and in this Policy. These principles define our expectations of all our employees.*

*Roche understands its obligation to society and the environment. We promote and provide safe, secure and healthy workplaces, a clean environment and sustainable products. These elements are evident in our mission and commitments. In establishing Roche's SHE Policy, Guidelines, Guidance Notes and Directives special consideration was given to the International Chamber of Commerce's Business Charter for Sustainable Development, international Conventions and internationally recognized Standards, such as those of the ISO (International Organization for Standardization) and the United Nations' Sustainable Development Goals.*

*The principles set out in this Policy are designed to establish a uniform minimum standard for all Roche companies and employees. We expect our suppliers and service providers to live up to comparable standards.*



## Obligation to Society

### Mission

Our aim as a leading healthcare company is to create, produce and market innovative solutions of high quality for unmet medical needs. Our products and services help to prevent, diagnose and treat diseases, thus enhancing people's health and quality of life. We do this in a responsible and ethical manner and with a commitment to sustainable development respecting the needs of the individual, the society and the environment.

### Commitments

**Respect for the Individual:** We want everyone in the organization to work under optimal conditions of health and safety.

**Commitment to Responsibility:** We want to meet high standards of performance and corporate responsibility in all our activities and we apply our Corporate Principles in our dealings with business partners.

**Commitment to Society:** We want to maintain high ethical and social standards in our efforts to protect the environment. We maintain these standards by adhering to local, national and international laws; by cooperating with authorities; and by proactively communicating with the public.

**Commitment to the Environment:** As part of our commitment towards sustainable development we proactively seek to employ new, more sustainable technologies and processes and to minimize our impact on the environment.

**Commitment to Innovation:** Innovation across all aspects of our business is the key to our success. We see change as an opportunity and complacency as a threat.

**Continuous Improvement:** We are committed to benchmarking our principles and achievements against the industry and best practice; this includes transparent reporting. We will continue to put in place directives and processes that enable us to implement each of our Corporate Principles.

*(Excerpts from the Roche Corporate Principles)*

Therefore:

**Safety, security, health and environmental matters are handled with the same sense of responsibility, and just as methodically, as issues concerning quality, productivity and cost-efficiency.**

## Compliance

Roche is committed to fully comply with all relevant laws and regulations in all countries where we operate. Roche's internal SHE Guidelines, Guidance Notes and Directives take precedence over locally applicable laws and regulations whenever they exceed the requirements laid down therein.

## Significance

SHE matters are integral parts of business planning, processes and decision making. This covers all issues within Roche as well as outside. Production constraints and other purely economic considerations must not be allowed to have an undue impact on people and the environment.

## Priorities

At Roche prevention is the key element for all activities, decisions and measures aimed at ensuring safety, security, health and environmental protection. We analyze our business activities to understand their negative impacts and find innovative solutions to minimize them and make positive contributions to health and the environment.

SHE risks are systematically managed through identification of hazards, evaluation and assessment of scenarios, prevention and reduction of risks and risk communication.

If a SHE risk is deemed unacceptable even after implementation of all technical, organizational and personnel measures, the materials or processes concerned must be replaced, withdrawn or discontinued.

Integrated process optimization takes precedence over the end-of-pipe treatment of waste or pollutants. Inherent safety of plants and processes has priority over other safety measures.

## Organization and Responsibilities

### **Corporate Executive Committee**

The Corporate Executive Committee (CEC) determines the SHE Policy on the basis of the Roche Corporate Principles and the Roche Sustainability Framework. The CEC defines the organizational structures and designates the functional responsibilities necessary for implementing this Policy. In addition, the CEC supervises compliance of the whole organization with this Policy.

### **General Managers, Site Managers**

The General Managers of Roche's Group companies and the Site Managers are responsible for all SHE aspects in the areas under their control. On the basis of this Policy and the Group SHE Guidelines and Directives, they adopt the local SHE handbook, establish the local SHE organization, provide the necessary resources, ensure SHE education and assign the responsibilities.

In particular, they take all technical, organizational and personnel measures to prevent potentially hazardous situations and to manage incidents or accidents, which might occur nevertheless. They cooperate with the local competent authorities in matters concerning SHE. They are supported by Group and divisional management in bearing their responsibilities.

General Managers and Site Managers ensure that all local staff know about and comply with all relevant laws and regulations as well as with this Policy and the Group SHE Guidelines, Guidance Notes and Directives. In addition they ensure local staff's compliance with all their statutory and regulatory requirements. The General and Site Managers nominate a competent local SHE Officer and a Site Security Officer to support and supervise implementation. The persons in charge of SHE tasks at each site are named in the local SHE handbook.

### **Line managers**

Line managers are responsible for the implementation of all necessary SHE measures in the area under their control.

### **Group SHE department – the SHE governance unit**

The Group SHE department submits SHE Policy proposals to the Corporate Executive Committee for approval and monitors Policy implementation. It establishes the Group SHE Guidelines and standards and is authorized to issue Directives and set SHE goals valid throughout the Group in response to specific SHE problems and opportunities.

The Group SHE department gathers and communicates general information on SHE issues. In order to provide a realistic picture about the SHE status in the Group and to initiate necessary corrective actions, it audits Group companies and sites and collects, evaluates and assesses SHE related key performance data on a regular basis.

The Group SHE department may delegate parts of its tasks to regional or functional groups.

### **Employees**

Every employee is personally responsible for SHE at the workplace to the full extent required by his or her duties and to the best of his or her knowledge, ability and experience.

## Continual Improvement

### **SHE objectives and goals**

SHE objectives and goals are defined on the basis of the general SHE strategy of the Roche Group, the present SHE status in the Group, the state-of-the-art of technology, the current developments in society and the United Nations Sustainable Development Goals in striving for continual improvement.

SHE performance and achievement of objectives and goals is measured against defined key performance indicators which are based on internationally accepted standards. The necessary information and data are collected regularly by the Group SHE department from all Group companies and sites.

### **SHE status**

The state of SHE is periodically assessed by local management and SHE Officers by means of a local statutory and regulatory compliance program, facility tours and spot checks, inspections and self-audits, and by the Group SHE department by means of audits and evaluation of performance indicators. If weaknesses, shortcomings or opportunities for improvement are identified, corrective and preventive actions are taken to improve the situation.

### **SHE efficiency**

Roche uses available resources for SHE in a way that brings out the best overall result through well-reasoned prioritization of SHE projects and activities.

In procuring and using raw materials and energy sources, selecting technologies and constructing and operating its facilities, Roche strives to conserve resources, avoid damage to the environment and protect the health of workers and the public. Increasing the eco-efficiency of processes, facilities and products is a priority.

### **Reporting and Communication**

Roche communicates transparently about SHE with its employees, the authorities, shareholders, the media, neighboring communities, customers, suppliers, interested organizations and the public at large.

Special emphasis is placed on fast, open and correct information in case of emergencies.

Roche regularly reports internally and externally on SHE key figures, SHE developments, strengths, and weaknesses in the Group. SHE reporting is part of the Roche business report according to internationally accepted standards.

### **SHE management system**

The SHE management system is periodically reviewed with special emphasis on possible improvements.

## Implementation

Roche is committed to enforce this Policy in all Group Sites and Organizations and uses it as the foundation on which our Safety, Security, Health and Environmental Protection processes are designed, implemented and monitored.

Likewise the company expects all employees to act in accordance with the Policy. If any employee suspects this Policy is being violated, they should bring this to their manager's or their SHE representative's attention immediately. The responsible Roche manager is required to take the necessary steps to terminate violation of any provision of this Policy. No employee will be disadvantaged if they report a violation or demand the application of this Policy. All Roche companies have individually to ensure that this Policy is properly implemented in their local SHE practices. Our Chief SHE Officer is responsible for informing the Corporate Executive Committee and the Board of Directors about material SHE developments, goals, plans and issues, including violations of this Policy, which occurred within the Roche Group.

This SHE Policy is implemented in a systematic manner by means of all necessary technical, organizational and personnel measures. The principles are further elaborated in Group Guidelines, Guidance Notes and Directives which are the basis for local Guidelines and Directives and the local SHE handbooks.

## Links

[https://www.roche.com/about/governance/code\\_of\\_conduct.htm](https://www.roche.com/about/governance/code_of_conduct.htm)

[Roche corporate principles](#) (only Roche internal)

[Roche Sustainability Framework](#)

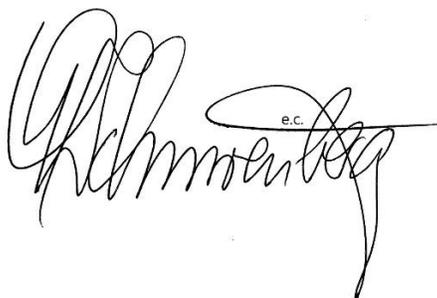
## Entry into Force

This Policy was updated and approved by the Corporate Executive Committee on May 17, 2021 and entered into force the same day. It replaces the previous Policy dated March 19, 2012.

Signed by the Chief SHE Officer, Peter Schnurrenberger:

Date: 21 May 2021

Signature:



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