

Roche

Supplier Code of Conduct



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Roche is committed to sustainability in all business activities and aims to apply the highest ethical standards. Our suppliers (suppliers, service providers, contract manufacturers) play an important role as enablers of our sustainable growth and overall success.

Roche regards lasting innovation as our biggest contribution to society. We collaborate with business partners who bring expertise and capabilities that help us improve efficiency, effectiveness, and business continuity. This collaboration enables us to deliver medical innovations that address the needs of our patients and benefit society. In delivering innovation, our patients and stakeholders expect us to uphold high standards of responsible and ethical behaviour in our operations and to ensure that our partners share these same high standards.

Roche is a member of the Pharmaceutical Supply Chain Initiative (PSCI), a non-profit industry organisation that unites members to define, establish and promote responsible supply chain practices. This document integrates the PSCI Principles and addresses its main areas: ethics, human rights, health and safety, environment and related management systems.

Roche adheres to applicable sustainability-related laws and regulations and is fully committed to supporting and respecting human rights. Roche acknowledges both the United Nations Guiding Principles on Business and Human Rights (UNGPs) ('Ruggie Framework') and the OECD Due Diligence Guidance for Responsible Business, and recognises and follows the international standard ISO 26000 guidance on social responsibility. Roche also adheres to the fundamental conventions of the International Labour Organization (ILO): elimination of forced and compulsory labour (Conventions 29 and 105), abolition of child labour (Conventions 138 and 182), elimination of discrimination in respect of employment and occupation (Conventions 100 and 111), freedom of association and collective bargaining (Conventions 87 and 98).

We require our suppliers to explicitly acknowledge and adhere to the principles embodied in this document. The adherence to this document is a binding agreement and an integral part of the contractual foundation between Roche and its suppliers.

Suppliers must ensure that their own suppliers appropriately ensure compliance with these principles along their own supply chains.

Suppliers shall ensure that Roche can verify compliance with this document through audits or surveys.

In case suppliers fail to meet Roche's expectations of this document, Roche demands immediate and documented corrective action. In case of major violation, Roche reserves the right to terminate business relationships and disqualify them from future opportunities.

Suppliers supporting these principles:

- Will follow local laws and regulations that might be more stringent than the principles set forth in this document.
- Believe that society and business are best served by responsible business behaviours and practices. Fundamental to this belief is the understanding that a business must, at a minimum, operate in full compliance with all applicable laws, rules and regulations.
- Are aware of differences in culture and the challenges associated with interpreting and applying these principles globally. While suppliers supporting these principles believe that what is expected is universal, it is understood that the methods for meeting these expectations may be different and must be consistent with the laws, values and cultural expectations of the different societies in the world.
- Believe that these principles are best implemented through a continual improvement approach that advances supplier performance over time.
- Will maintain documentation necessary to demonstrate conformance with these expectations and compliance with applicable laws and regulations. Suppliers shall make such documentation accessible to Roche upon request.
- Shall have systems to communicate the expectations outlined in this document to relevant stakeholders, including their workers and own suppliers.



Ethics

Suppliers shall conduct their business in an ethical manner and act with integrity. The ethics elements include:

Anti-bribery and anti-corruption

Roche does not tolerate any other form of corrupt business behaviour, such as bribery (public, private, active and passive), extortion, embezzlement, fraud, theft or the granting of improper advantages (direct or indirect) or the participation in other illegal inducements in business and government relationships. Improper advantages can include illegal rebates, bribes, kickbacks and under-the-table payments or anything of value such as gifts. Suppliers shall ensure they have adequate systems in place to prevent corruption and comply with applicable laws.

Fair competition

Suppliers shall conduct their business consistent with fair and vigorous competition and in compliance with all applicable antitrust laws. Suppliers shall employ fair business practices, including accurate and truthful advertising.

Animal welfare

Animals shall be treated respectfully, with pain and stress minimised. Animal testing shall be performed after consideration to replace animals, reduce the numbers of animals used or refine procedures to minimise distress. Alternatives shall be used wherever scientifically valid and acceptable to regulators.

Privacy

Suppliers shall safeguard and make only proper use of confidential information to ensure that company, worker and patient privacy rights are protected. Suppliers shall ensure the protection, security, and lawful use of personal data.

Avoidance of conflict of interest

Suppliers shall take reasonable care to identify, avoid, and manage conflicts of interest. Suppliers shall notify Roche if an actual or potential conflict of interest arises.

Product protection

Suppliers shall ensure that management and security systems protect products, components and ingredients from the risks of adulteration, falsification, or theft for the purpose of illegal resale.



Human rights and labour

Suppliers shall be committed to ensuring the human rights of workers and to treating them with dignity and respect. The human rights and labour elements include:

Freely chosen employment

Suppliers shall not use forced labour, bonded or indentured labour, involuntary prison labour, or take part in human trafficking or any form of modern slavery. Workers should not be subjected to any form of payment in order to secure employment, or be denied the freedom of movement. Suppliers shall not engage in any form of precarious employment.

Child labour and young workers

Suppliers shall not use child labour. The employment of young workers below the age of 18 shall only occur in works conducted by them that do not cause harm to their health, safety or morale and when young workers are above a country's legal age for employment or the age established for completing compulsory education.

Non-discrimination

Suppliers shall strive for equality, providing a work environment free from discrimination for reasons such as race, colour, age, pregnancy, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership or marital status.

Fair treatment

Suppliers shall provide a work environment free of harassment, harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, or verbal abuse of workers, and no threat of any such treatment.

Wages, benefits and working hours

Suppliers shall pay workers according to applicable wage laws and agreed employment contracts, including minimum wages, overtime hours and mandated benefits. Suppliers shall consider remuneration in accordance with the skills, performance and experience of their workers based on local competitive conditions, as well as offer benefits in accordance with local market practices. Suppliers shall communicate to the worker the basis on which they are being compensated in a timely manner. Overtime work shall be voluntary, as well as consistent with applicable national and international standards. Suppliers are also expected to communicate to the worker whether overtime is required if allowed by the local employment laws and regulations and the wages paid for such overtime.

Freedom of association and the right of collective bargaining

Open communication and direct engagement with workers to resolve workplace and compensation issues are encouraged. Suppliers shall respect the rights of workers, as set forth in local laws, to associate freely, join or not join labour unions, seek representation and join workers' councils, as well as to bargain collectively. Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining. Workers shall be able to communicate openly with management regarding working conditions without fear of retaliation.

Local communities and indigenous communities

Suppliers shall respect the rights of the local communities around their sites including the right to a clean and healthy environment. Suppliers shall respect, promote and protect the rights of indigenous communities.

Responsible sourcing of minerals and metals

Suppliers must use and import minerals and metals from responsible sources only. This applies especially to what are known as conflict minerals and metals, i.e. ores and concentrates containing tin, tantalum, tungsten or gold (3TG).



Health and safety

Suppliers shall provide a safe and healthy working environment and support the well-being of workers. The health and safety elements include:

Safety of the work environment

Adequate risk assessment and emergency plans shall be in place to ensure the safety of the work environment. Safety information relating to hazardous materials – including pharmaceutical compounds and pharmaceutical intermediate materials – shall be available and used to educate, train, and protect workers from hazards. Suppliers shall demonstrate good housekeeping practice and a culture of safety.

Worker protection, health and well-being

Suppliers shall protect workers from overexposure to chemical, biological, physical and ergonomic hazards. Appropriate equipment, facilities and services shall be provided to support worker safety, health, and well-being.

Process safety

Suppliers shall have management processes in place to identify, assess and mitigate risks in all relevant areas, especially from chemical and biological processes.

Emergency preparedness and response

Suppliers shall identify and assess emergency situations in all areas, minimise their impact by providing emergency response equipment and supplies, implementing emergency plans and response procedures, including regular emergency response drills.



Environment

Suppliers shall operate in an environmentally responsible and efficient manner to minimise adverse impacts on the environment, and to help their own suppliers do the same. The environmental elements include:

Environmental compliance

Suppliers shall comply with all applicable local, national and international environmental laws and regulations in the regions they operate. All required environmental permits, licences, information registrations, chemical registrations and restrictions shall be obtained and their operational and reporting requirements followed.

Management of waste and emissions

Any waste, wastewater, or emissions with the potential to adversely impact human or environmental health shall be appropriately managed, controlled and treated prior to release into the environment. This includes managing releases of active pharmaceuticals into the environment (PiE).

Climate change

Suppliers shall assess and disclose their greenhouse gas emissions (scope 1, 2 and 3) and set emission reduction targets aligned to the 1.5 °C pathway according to the Paris Agreement. Suppliers shall set targets to reduce waste and energy consumption, and strive to switch to renewable power. Suppliers shall support their suppliers to do the same.

Resource efficiency

Suppliers shall strive for circularity, designing out waste, taking measures to improve efficiency and reduce the consumption of resources, including water, favouring renewable and sustainable sources. They shall also take measures to reuse and recycle.

Biodiversity conservation

Suppliers shall comply with the fair and equitable access and benefit sharing principles relating to the use of genetic resources in accordance with the Convention on Biological Diversity including the Nagoya Protocol. Any utilisation of natural (non-) renewable resources within our supply chain shall not contribute to deforestation or ecosystem degradation. Suppliers need to fulfil any regulatory requirements in this respect, e.g. EU Regulation on Deforestation-free Products (EUDR). Facilities shall not be operated in areas that are protected or have high biodiversity value.

Spills and releases prevention

Suppliers shall have effective systems in place to prevent, mitigate and communicate accidental spills and releases to the environment and adverse impacts on the local community.

Hazardous materials

Suppliers shall assist Roche in reducing the chemical footprint of its activities and products by avoiding banned or restricted substances. Furthermore, suppliers should actively phase out substances of concern, such as substances of very high concern (SVHC) and per- and polyfluoroalkyl substances (PFAS), in line with current legislation and industry standards. In particular, suppliers shall support Roche's phase-out goal of SVHC within ten years after a substance has been declared as SVHC by the European Chemical Agency. Suppliers must provide accurate and compliant material declarations, and ideally full material disclosures. This is essential for effective substance management.



Governance and management systems

Suppliers shall use management systems to facilitate compliance and continual improvement with these principles. The management systems elements include:

Culture, commitment and accountability

Suppliers shall demonstrate commitment to the concepts described in this document by allocating appropriate resources and identifying senior responsible personnel, thereby creating a culture of responsible practices.

Legal and customer requirements

Suppliers shall identify and comply with applicable laws, regulations, standards, and relevant customer requirements.

Risk management

Suppliers shall have risk management mechanisms to identify and manage risks in all areas addressed by this document, and to regularly review and update them.

Transparency and traceability

Suppliers must have systems in place to carry out due diligence on their own supply chain, including traceability for the sources of raw materials to support responsible sourcing. Suppliers shall provide, if requested, supply chain transparency to Roche regarding all areas addressed by this document.

Training and competency

Suppliers shall have a training programme that achieves an appropriate level of knowledge, skills and abilities in management and workers to address the expectations listed in this document.

Continual improvement

Suppliers are expected to continually improve by setting performance objectives and executing implementation plans. Suppliers shall take necessary corrective actions for deficiencies identified by internal or external assessments, inspections, and management reviews.

Identification and reporting of non-compliance

Suppliers must establish procedures accessible to internal and external stakeholders to report and handle potential non-compliance of the principles in this document, without fear of retaliation. They shall properly investigate, and take corrective and remediation actions, where required. Further, they shall encourage the use of the Roche Group SpeakUp Line available on <https://www.roche.com> for concerns related to Roche's supply chain.

In addition to the PSCI Principles, the following principles are of importance to Roche:

Intellectual property

Roche delivers medical innovations that improve people's health and quality of life by working with suppliers that can best meet our business demands and requirements in terms of cost, innovation, integrity, quality, suitability, credibility and sustainability. As business partners supporting Roche's efforts, suppliers shall respect Roche's intellectual property rights, protect Roche's trade secrets and confidential information, and safeguard customer information. Suppliers shall manage technology and know-how in a manner that protects intellectual property rights.

Economic sustainability

Suppliers are encouraged to help foster social and economic development and contribute to the sustainability of the communities in which they operate.

The Roche Supplier Code of Conduct supersedes the previous version and enters into force as of 1 January 2025.

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