

# Rules of Procedure

## for investigating reports of human rights and environmental violations within the supply chain and the Roche Group Codes of Conduct

For all companies of the Roche Group in Germany, in particular for

- [Roche Deutschland Holding GmbH](#)
- [Roche Diagnostics GmbH](#)
- [Roche Diagnostics Deutschland GmbH](#)
- [Roche Diabetes Care GmbH](#)
- [Roche Diabetes Care Deutschland GmbH](#)
- [Roche Real Estate Services Mannheim GmbH](#)
- [Roche Diagnostics Automation Solutions GmbH](#)
- [Roche mtm laboratories AG](#)
- [TIB Molbiol Syntheselabor GmbH](#)
- [Signature Diagnostics AG](#)
- [Roche Pharma AG](#)
- [RoX Health GmbH](#)

The above companies are hereinafter referred as "Roche".



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# 1 Background

## Sustainability at Roche

Sustainability is part of our business strategy and is the responsibility of all Roche employees.



What we do every day must be sustainable, if we want to be successful. That is why sustainability is integrated into our business strategy and is part of every employee's job at Roche.

Our approach is holistic and integrates the three dimensions of sustainability.

<b>Company:</b>	how we contribute to a better future for all
<b>Environment:</b>	how we minimize the impact of our activities on nature
<b>Economy:</b>	how we invest in medical progress, create jobs and safeguard livelihoods

Human rights and environmental protection are thus an integral part of our business activities and have a long tradition at Roche. They are anchored and recorded in the values and guidelines, e.g. in the codes of conduct for employees and suppliers.

## 1 Background

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This also means that non-compliant behavior is thoroughly addressed, investigated, reported and sanctioned.

**Code of Conduct for Suppliers**

[Roche Supplier Code of Conduct](#)

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**Code of Conduct for Employees**

[Roche Group Code of Conduct](#)

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## 2 Report

### What does the procedure cover?

These Rules of Procedure cover the following types of complaints, regardless of the reporting channel by which they reach Roche:

- Hinweise, die menschenrechtliche und/oder umweltbezogene Risiken oder Verletzungen entlang der gesamten Lieferkette von Roche gemäß dem Lieferkettensorgfaltspflichtengesetz betreffen.
- Alle anderen Verstöße gegen den Roche Supplier Code of Conduct oder den Roche Group Code of Conduct.

### Reporting channels

Individuals who intend to report information about a breach can choose to contact a Roche internal reporting office or an external reporting office.

In Germany, the function of the external reporting office is assumed by the Federal Office of Justice (Bundesamt für Justiz).

If an internally reported violation has not been remedied, the whistleblower is free to contact an external reporting agency.

For Roche the following reporting channels are available internally
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Manager
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Compliance Officer
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Chief Compliance Officer
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Human Rights Officer
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Works Council
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Human Resources
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<a href="#">Speak Up Line - anonym möglich</a>
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The following reporting channels are available externally
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<a href="#">Roche Speak-Up Line</a>
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Federal Office of Justice (Bundesamt für Justiz)
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## 2 Report

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### Competent Authorities

The responsibility includes both the coordination and documentation of the procedure.

The responsibility for violations

- against the Roche Supplier Code of Conduct or the protected positions of the Supply Chain Act lies with the Human Rights Officer of the German Roche companies, email address [deutschland.menschenrechtsbeauftragte@roche.com](mailto:deutschland.menschenrechtsbeauftragte@roche.com).
- against the Roche Code of Conduct or its protected position lies with the Compliance Officer of the respective Roche company.
- with an international context lies with the [Chief Compliance Officer](#).
- at another Roche site in another country lies with the respective Compliance Officer of the respective country.

### Procedural principles

The persons involved in the procedure are independent in the performance of their duties and have the necessary expertise.

Reporting entities shall maintain the confidentiality of the identity of the following individuals:

- reporting person
- persons who are the subject of a notification
- other persons named in the notification

### Restrictions on Confidentiality requirement

The confidentiality requirement is not observed in the following cases:

- Person who intentionally or grossly negligently reports inaccurate information on violations
- In criminal proceedings at the request of the prosecuting authorities
- Due to court decision

The reporting office must inform the person providing the information in advance of the disclosure. This must be dispensed with if the law enforcement agency, the competent authority or the court has informed the reporting office that the information would jeopardize the relevant investigations, inquiries or court proceedings.

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### 3 Documentation and Data Privacy

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**Protection of the reporting person**

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Roche does not tolerate retaliations, neither against whistleblowers nor against other potential participants in the proceedings who express reasonable suspicion that the Roche Group Supplier Code of Conduct, the Roche Group Code of Conduct or the legal positions protected by the Supply Chain Act have been violated.

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**Reporting Tool**

The case is documented in a Roche controlled internal case management system.

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**Privacy**

For all records is observed

- Confidential treatment of the documents
  - Safe storage
  - Compliance with [data protection and confidentiality](#) requirements
  - Compliance with Roche requirements for the duration of data archiving
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## 4 Deadlines

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**Acknowledgement of Receipt**

The responsible function, see point 2, confirms receipt of the report to the person providing the report no later than seven days after receipt of the notification and documents the receipt.

**File Attachment**

The files must be created within seven days.

**Status Updates**

At least every three months, an update must be made in the files according to the knowledge gained up to that time.

**Feedback to Person providing Information**

The internal reporting office, see point 2

- keeps contact with the reporting person;
- discusses the facts with the latter; and
- provides information on the status of the investigation within three months of acknowledging receipt of the report.



## 5 Sequence of the Procedure

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**Sighting**

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The responsible reporting office, see point 2, reviews the available information.

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**Examination of the Complaint or Notice**

If the reference falls within the scope of these rules:

yes	Continue with classification
no	Information to the reporting person

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**Clarification of the Facts**

The matter will be investigated and reviewed by the responsible unit, see point 2. If necessary, the case will be forwarded to another responsible unit within the Roche Group.

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## 5 Evaluation of the Report

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**Type of Evaluation**

The investigation of the facts is followed by an evaluation of the facts. All persons entrusted with the conduct of the proceedings are impartial, independent and not bound by instructions.

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**Disciplinary Actions**

In addition, disciplinary action may be imposed for conduct not in accordance with the regulations. These include, but are not limited to:

- Verbal or written warning
  - Reduction or abolition of the bonus
  - Reduction or cancellation of share awards
  - Downgrading of a position or
  - Termination of employment
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**Remedial Actions towards Suppliers**

Termination of the business relationship if

- the violation of a protected legal position or an environmental obligation is assessed as very serious,
  - the implementation of the measures developed in the concept does not remedy the situation after the time specified in the concept has elapsed, and
  - Roche no other milder means are available or
  - the violation of a protected legal position or an environmental obligation is judged to be so serious that remedial action is not promising and Roche has no milder means available.
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## 6 Closure

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### Reporting

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At the end of the procedure, the institution responsible for the procedure, see point 2, prepares a final report.

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## 7 Effectiveness of the Appeal Procedure

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### Report

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The institution responsible for the procedure, see point 2, prepares an annual report which includes at least the following points:

- Received reports
- Implementation of the remedial measures

The report of the Human Rights Commissioner further includes the following points:

- Effectiveness of the remedial measures
  - Prevention measures and
  - Effectiveness of the prevention measures
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Mannheim, Dezember 27, 2022

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### Publisher

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