

# **Roche Group Code of Conduct**



# Roche Group Code of Conduct





# Behaviour in Business

## Why it matters

Dear Colleagues,

Roche is recognised as a leader in creating, producing, and marketing innovative healthcare solutions of high quality for unmet medical needs. We do business in a responsible and ethical manner, and with a commitment to sustainable development, respecting the needs of the individual, the society and the environment.

Roche's reputation is one of its most valuable assets. Our stakeholders expect us to do the right thing. We all have a responsibility to foster and protect Roche's reputation. Our Roche Values – Integrity, Courage and Passion – and the Roche Corporate Principles provide clear guidance for our business behaviour.

The Roche Group Code of Conduct clearly expresses Roche's expectations as your employer and provides you with practical guidance, examples and references to further useful information.

Roche strongly strives for a culture of mutual trust that encourages the free exchange of views across all organisational levels. A liberal working environment is critical to our success. By fostering a two-way dialogue and playing an active role, every Roche employee can make a difference.

Roche is convinced that integrity is and will remain the basis of our sustainable and successful business and our culture. Any breach of integrity could result in a loss of our licence to operate, making us unable to provide our products to the patients in need.

Whenever you are in doubt about correct business behaviour, seek help and advice. If you have a compliance concern, speak up. The Roche Group Code of Conduct tells you where you can find help and advice and to whom you can raise a compliance concern.

The Corporate Executive Committee and the Board of Directors of Roche Holding Limited have formally endorsed the Roche Group Code of Conduct and fully support initiatives designed to foster its implementation.

Please take the time to read our Roche Group Code of Conduct, live and personally implement it in all your daily business activities.



Severin Schwan  
Chief Executive Officer

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# Introduction

## Roche Strategic Framework

Outlining the fundamental characteristics of Roche

### Our Purpose

*Doing now what patients need next*

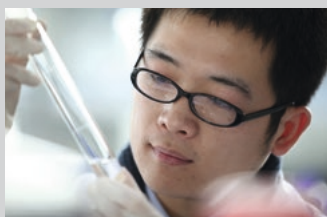
### Our Strategic Framework

#### What we do



#### Our Focus

*Fitting treatments to patients*



#### Our Distinctiveness

*Excellence in science*



#### Our Delivery

*Value for all stakeholders*

#### How we manage



#### Our People

*Making their mark*



#### Our Decision Making

*Accountable and transparent*



#### Our Structure

*Built for innovation*

### Our Values

*Integrity. Courage. Passion.*

# Roche Purpose Statement

Describing who we are, what we aspire to and how we want to work

*Doing now what patients need next*

We believe it's urgent to deliver medical solutions right now – even as we develop innovations for the future. We are passionate about transforming patients' lives. We are courageous in both decision and action. And we believe that good business means a better world.

That is why we come to work each day. We commit ourselves to scientific rigour, unassailable ethics, and access to medical innovations for all. We do this today to build a better tomorrow.

We are proud of who we are, what we do, and how we do it. We are many, working as one across functions, across companies, and across the world.

**We are Roche.**



# Roche Corporate Principles

They define our commitments

## Commitments

### Service to Patients and Customers

A prime objective of Roche is to meet patients' and customers' needs for high-quality products and services. This implies identifying and solving their problems and anticipating their future needs by maintaining close contacts with them and listening to what they say. Our commitment includes full respect for patients' individual rights.

### Respect for the Individual

We believe that the success of our company depends on the combined talents and performance of dedicated employees. For this reason, we want:

- to build respect for the individual into all our work by ensuring that all members of the organisation understand their responsibility to respect each other's rights and dignity;
- our people to develop their talents and make optimal use of their abilities and potential and to encourage information-sharing and open dialogue;
- to provide recognition based on performance and contribution to Roche's success;
- to promote diversity and equal opportunities;
- everyone in the organisation 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. We are committed to selecting, developing and promoting employees and managers with self-drive and empathy who:

- combine professional competence with a leadership style that motivates people to high performance;
- have an open mind and a sense of urgency, understand the needs of the company and have the courage to question conventional wisdom;
- have the flexibility required to broaden their experience;
- live these Corporate Principles in their decisions and actions.

### Commitment to Performance

We aim to continuously create value for our stakeholders and to achieve sustainable, high profitability. We do this in order to maintain our commitment to research, to ensure our growth and independence, to provide employment opportunities, to cover risks and to pay an attractive return on invested capital.

### Commitment to Society

We want to maintain high ethical and social standards in our business dealings; in our approach to medical science; in our efforts to protect the environment; and to ensure good citizenship. We maintain these standards by adhering to local, national and international laws; by cooperating with authorities; and by proactively communicating with the public. We recognise the need to work in partnership with our stakeholders and regularly seek their views and take them into account. We support and respect human rights and have implemented the “Protect, Respect, Remedy” approach from the UN Human Rights Council’s Ruggie Framework. We are equally committed to complying with the 10 UN Global Compact Principles; the Universal Declaration of Human Rights; and the Fundamental Labour Rights stipulated by the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work.

### 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 minimise our impact on the environment.

### Commitment to Innovation

Innovation across all aspects of our business is the key to our success. Being active in high-technology fields, we must recognise new trends at a very early stage and be open to unconventional ideas. We see change as an opportunity and complacency as a threat. We therefore encourage everywhere in the company the curiosity needed to be open to the world and new ideas.

### 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.

# Roche Group Code of Conduct

Defining how we do business – every day, everywhere

Roche's good reputation depends on its integrity in business.

In all interactions with our stakeholders we are committed to doing the right thing.

The Roche Group Code of Conduct expresses the expectations that Roche has as an employer towards its employees. All Roche companies are obliged to adopt all measures necessary to implement the Roche Group Code of Conduct locally.

All employees and all others acting on behalf of Roche must comply with the Roche Group Code of Conduct, regardless of their location and the nature of their work. Following the "One Roche Approach" principle, the standards set forth are equally binding for the Group Functions, the Pharmaceuticals Division and the Diagnostics Division.

The Roche Group Code of Conduct is designed to guide our business behaviour and provides practical guidance, examples as well as references to further useful information. Additional compliance documents and tools which have been established are an integral part of Roche's comprehensive Compliance Management System (CMS). However, these materials may not provide answers to every question we may have and are not a substitute for our individual responsibility to exercise good judgment and common sense.

In cases of doubt about the correct behaviour, we must seek help and advice.

Interactive, computer-based eLearning programs, such as the "Roche Behaviour in Business" (RoBiB) and other user-friendly training tools, such as Compliance Podcasts, have been developed to help explain the importance of integrity in business. They cover the key messages of our Roche Group Code of Conduct.

Adherence to the Roche Group Code of Conduct is a condition of employment. Each employee must read, understand and comply with it. Roche does not tolerate violations of the Roche Group Code of Conduct and is fully committed to handling non-compliance cases adequately. Employees must be aware that such violations can have serious consequences for the company and for themselves and that they will be held accountable.

## We are all expected to:

- Behave with integrity and help maintain Roche's good reputation.
- Carefully complete the eLearning programs.
- Be aware that violations of the Roche Group Code of Conduct are not tolerated and can have consequences for Roche and ourselves.

**Q** Why do we need a Roche Group Code of Conduct?

**A** The Roche Group Code of Conduct states Roche's expectations as an employer towards its employees and sets forth the standards for business behaviour that apply throughout the Roche Group.

**Q** Does the Roche Group Code of Conduct apply to everyone in the Roche Group?

**A** Yes. All employees and all others acting on behalf of Roche must comply with the Roche Group Code of Conduct, regardless of their location and the nature of their work. The standards set forth are equally binding for Group Functions, the Pharmaceuticals Division and the Diagnostics Division.

**Q** I am requested to complete the RoBiB eLearning program. Due to other urgent business activities, I do not find time to complete the eLearning program. I set priorities and decide not to complete it. Have I made a good decision?

**A** No. Since the eLearning programs, such as the RoBiB, are designed to support you in your endeavours to comply with the Roche Group Code of Conduct you should complete them carefully.



# Getting Help & Advice

## Questioning is part of preventing

In our daily work we may face situations from time to time which are not explicitly covered by the Roche Group Code of Conduct or the documents it refers to (e.g. directives, policies, guidelines). If we are unsure about the correct behaviour, we should ask ourselves the following questions:

- Is my behaviour legal?
- Is it in line with Roche's Values and Corporate Principles?
- Does it comply with the Roche Group Code of Conduct?
- Could it have negative consequences for Roche or myself?
- Would I be comfortable if it was reported in a newspaper?

Often this will provide all the guidance we need. However, in case of doubts or uncertainties about the correct behaviour, seeking help and advice is the right thing to do.

By fostering a culture of openness to ask questions, Roche, first and foremost, aims to prevent non-compliant behaviour.

Our Line Manager, the local Compliance Officer and the Chief Compliance Officer are convenient contacts to address uncertainties to. In addition to locally and regionally available help and advice tools, Roche employees can also use the Roche Group Code of Conduct Help & Advice Line (RoCoCHAL).

Roche Line Managers are responsible for ensuring that all employees reporting to them receive the help and advice they need to comply with the Roche Group Code of Conduct.

## We are all expected to:

- Contact our Line Manager, the local Compliance Officer, the Chief Compliance Officer or the RoCoCHAL to seek help and advice if we have doubts about the correct business behaviour.
- Provide help and advice to employees who report to us.

**Q** What can I do if I am unsure about a correct business behaviour?

**A** Ask yourself specific questions such as "Would I be comfortable if my behaviour was reported in a newspaper"? In case of doubt, seek help and advice.

**Q** Where can I seek help and advice?

**A** You can contact your Line Manager, the local Compliance Officer or the Chief Compliance Officer. In addition to locally and regionally available help and advice tools, you can also submit a request to the Roche Group Code of Conduct Help & Advice Line.

**Q** As a Line Manager, what do I have to ensure as part of my leadership responsibility?

**A** As a Line Manager you must ensure that the employees who report to you receive the help and advice they need to comply with the Roche Group Code of Conduct.

# Speak up

## Speaking up is the right thing to do

Roche employees who speak up when they have a compliance concern are doing the right thing and are acting in line with our Roche Values and Corporate Principles.

Roche Management needs to be aware of integrity issues so that it can address them quickly and in a trustworthy way. By raising compliance concerns, Roche employees help to protect themselves, their colleagues and Roche's interests and rights.

If we have a compliance concern, it is generally best to talk to our Line Manager about it face to face. If we are uncomfortable about discussing a compliance concern with our Line Manager, we should contact our local Compliance Officer, the Chief Compliance Officer, Legal, HR or the available affiliate or group function speak up lines.

In addition and subject to applicable local laws, the Roche Group SpeakUp Line allows Roche employees to report a compliance concern anywhere and anytime in their native language, either by internet and/or by phone. The system is operated by an external provider and provides the option to speak up in anonymity.

Any employee who raises a compliance concern in good faith acts in the interest of Roche and deserves acknowledgment. Roche does not tolerate any retaliation against an employee who raises a compliance concern in good faith. In case any employee deems that this principle is not adhered to, a complaint can and should be raised to either the Chief Executive Officer, the Chief Compliance Officer, the Group Head of HR or any member of the Audit Committee or the Corporate Governance and Sustainability Committee of the Board.

Equally, Roche does not tolerate any abuse of the Roche speak up channels.

Roche Line Managers are expected to create an environment of trust that encourages employees to speak up and address compliance concerns.

## We are all expected to:

- Speak up when we believe in good faith that someone has done, is doing, or may be about to do something that violates the Roche Group Code of Conduct.
- Raise compliance concerns with our Line Manager.
- Use the other available speak up channels if we do not feel comfortable about raising a compliance concern with our Line Manager.
- Speak up if we become aware that someone is subject to retaliation for raising a compliance concern in good faith.

**Q** Am I acting in Roche's interest if I speak up?

**A** Yes. Roche Management needs to be aware of integrity issues so that it can address them quickly and in a trustworthy way. If you speak up, you are doing the right thing and are acting in line with our Roche Values and Corporate Principles.

**Q** When should I speak up?

**A** If you believe in good faith that someone has done, is doing, or may be about to do something that violates the Roche Group Code of Conduct, you are expected to speak up.

**Q** Which are the available speak up channels?

**A** Your Line Manager is generally your first point of contact. If you feel uncomfortable discussing your concern with him/her, you can contact your local Compliance Officer, the Chief Compliance Officer, Legal, HR, the available affiliate or group functions speak up lines, or the Roche Group SpeakUp Line.

**Q** When using the Roche Group SpeakUp Line, can I remain anonymous?

**A** Yes. As the Roche Group SpeakUp Line is operated by an external provider, the system guarantees anonymity.

**Q** What is the main difference between the Roche Group SpeakUp Line and the Roche Group Code of Conduct Help & Advice Line?

**A** The Roche Group Code of Conduct Help & Advice Line helps to prevent non-compliant situations. The Roche Group SpeakUp Line is about reporting a potential compliance violation after it occurred.





# Our Products and Services

## Innovation & Quality

We create innovative products and services of high quality

Our products and services help to prevent, diagnose and treat diseases, thus enhancing people's health and quality of life.

For over a century, the Roche name has stood for innovative, high-quality products and services. Innovation and quality are fundamental pillars of our strategy and culture, and they provide us with a tremendous competitive advantage.

We strive to achieve high standards of quality in everything we do. In order to be successful, Roche must be responsive to changing market situations and strive for distinctively outstanding and excellent products through efficient business processes. This is the objective of quality management, with one of its key aims being the continuous improvement of business processes and products. Innovation is critical as it drives improvement and increased quality.

A key component of our innovation strategy is personalised healthcare. Personalised healthcare means the right therapy for the right group of patients at the right time. For a number of diseases, we have medicines with companion diagnostic tests that can identify patient subgroups, bringing greater precision to treatment.

### We are all expected to:

- Ensure that the high expectations of our stakeholders regarding the quality of our products and services are fully met.
- Strive for continuous improvement of business processes and products.
- Support personalised healthcare.

**Q** What are the two defining characteristics of Roche's products and services?

**A** Roche's products and services are associated with innovation and high quality.

**Q** What is meant by personalised healthcare?

**A** Personalised healthcare means fitting treatments to different groups of patients.

# Quality Standards & Good Practices

## Adhering to quality standards and good practices is a precondition for our licence to operate

Maintaining high-quality standards is an important part of regulatory compliance and a prerequisite for our business. Roche is committed to complying with legal and regulatory requirements, internationally acknowledged good practices, e.g. Good Clinical Practice (GCP), Good Pharmacovigilance Practice (GVP), Good Laboratory Practice (GLP) and Good Manufacturing Practice (GMP), and to meeting the high expectations of its stakeholders regarding the quality, safety and efficacy of its products and services.

Roche expects that its business partners also adhere to its high-quality standards.

To strengthen the oversight and management of GCP/GVP, Roche has set up a Medical Compliance Committee as the governance body for medical compliance across the Pharmaceuticals Division. It is supported by the Medical Compliance Office, which ensures an integrated, aligned and coordinated medical compliance strategy.

Patient safety and timely reporting of any adverse events and customer complaints is of the utmost importance. Roche employees have been trained to, upon awareness, immediately report any adverse event to their local safety unit and any customer complaints to the local regulatory and quality function, regardless of whether the employee becomes aware of it during or outside of work and regardless of the communication channel (e.g. in person, via social media).

An adverse event is defined as any untoward medical occurrence in a patient or clinical investigation subject administered a Roche pharmaceutical product and which does not necessarily have a causal relationship with this treatment. An adverse event may include but is not limited to drug overdose (accidental or intentional), death, drug abuse, pregnancy, lack of efficacy or withdrawal symptoms.

Medical device reporting requires the reporting of any customer complaint. A customer complaint is defined as any written, electronic or oral communication that alleges deficiencies related to the identity, quality, durability, reliability, safety, effectiveness or performance of a Roche medical device after it is released for distribution.

### We are all expected to:

- Comply with legal and regulatory requirements as well as internationally acknowledged good practices.
- Ensure that our business partners adhere to our high-quality standards.
- Immediately report adverse events relating to Roche pharmaceutical products to the local safety unit.
- Immediately report customer complaints relating to Roche medical devices to the local regulatory and quality function.

**Q** I work on a production line. What should I do if I notice that some finished products coming off the line do not meet Roche quality standards?

**A** The Roche brand stands for products of high quality. If you notice products that do not meet Roche standards, follow the processes as defined in the applicable documentation and if necessary inform your Line Manager and experts from the quality assurance departments. Make sure that the necessary steps are taken.

**Q** A healthcare professional with whom I interact regularly at work calls me and mentions that a patient of hers on Roche drug X was recently hospitalised with pneumonia and died. Do I have to report that?

**A** Yes. This adverse event should immediately be reported to the local safety unit.

**Q** While surfing the internet, I discover a social media site on which a patient mentions that he experienced blurred vision after taking Roche drug Y. Do I have to report that?

**A** Yes. If you become aware of such information, you should report it to the local safety unit. This includes information from non-Roche-owned websites.

**Q** In case of an adverse event, what do I need to report?

**A** In case of an adverse event you should report at least the following four elements: Patient, Reporter, Event and Product (PREP).

**Further information and guidance:** eLearning programs, e.g. "Reporting Adverse Events". **Help & advice:** In case of questions regarding regulatory compliance, including your obligation to report adverse events and customer complaints relating to Roche products, please contact the responsible experts, e.g. the local safety unit or the regulatory and quality function. **Speak up:** If you believe in good faith that in connection with business where Roche is involved someone has done, is doing, or may be about to do something that violates quality standards and good practices, speak up by using the available speak up channels.

# Access to Healthcare

## Our commitment to sustainable healthcare

Significant breakthroughs in diagnosing and treating serious diseases, as well as improvements in the delivery of healthcare, have steadily improved health outcomes and increased life expectancy. However, universal access to medical innovation and quality healthcare remains a global challenge and an ethical issue.

Finding equitable and sustainable solutions to the global barriers to healthcare can only be achieved through persistent commitment and action by multiple stakeholders. It requires all players – public authorities, non-governmental stakeholders, local communities and the healthcare industry – to work closely together. To succeed, we must jointly develop innovative, sustainable ways to bring effective and affordable healthcare to people in order to improve health outcomes.

As a global healthcare company, Roche shares a responsibility to tackle the challenges of improving access by overcoming barriers. We pursue sustainable and comprehensive solutions that are tailored to local healthcare needs. In addition to our key contribution as an innovator of new medicines and diagnostics, we offer patient access programs, including but not limited to improving affordability, investing in healthcare infrastructure, increasing public health awareness as well as advancing the prevention and early detection and monitoring of diseases.

We seek to maintain a business model that is financially sustainable, balancing the needs of all stakeholders with our commitment to improving access. As a general rule, we believe supporting improvements in healthcare systems has much more impact than product donations. Hence, drug and diagnostic donations are not a core component of our policy or practice to increase sustainable access to our goods and services globally.

All access programs need to be compliant with all applicable laws, regulations and industry codes, including but not limited to topics such as pharmacovigilance, pricing policy, patient data protection, antitrust requirements and integrity standards related to interactions with business partners and other stakeholders.

## We are all expected to:

- Ensure that all access programs are fully compliant with applicable laws, regulations and industry codes.
- Direct inquiries for free products to Roche's Corporate Donations and Philanthropy department.

**Further information and guidance:** Roche Brochure "Improving access: overcoming barriers"; Roche Pharma Directive on Grants, Sponsorships and Donations to Healthcare-Related Entities; Roche Group Reporting Manual. These documents can be found on the Roche intranet (website of Group Legal Department). In addition, the book "Lifesavers for millions" has been published by Editiones Roche. **Help & advice:** In case of questions regarding access to healthcare, please contact your Line Manager, the local Compliance Officer, the Chief Compliance Officer or the Roche Group Code of Conduct Help & Advice Line. **Speak up:** If you believe in good faith that in connection with access to healthcare someone has done, is doing, or may be about to do something that violates the provisions regarding access to healthcare, speak up by using the available speak up channels.

**Q** What is meant by access to healthcare?

**A** Healthcare resources and the demands on those resources vary widely from country to country and even within countries, due to a rise in chronic diseases, combined with an ageing population, increased unemployment and economic pressures which further aggravate inequalities in access to healthcare. Our aim is that every person who needs our products is able to access and benefit from them. Thus we pursue sustainable and comprehensive solutions that are tailored to local healthcare needs, taking into account income levels, disease patterns and cause, political commitment to healthcare and healthcare infrastructure.

**Q** What do I do if I receive a request for free products?

**A** Requests that Roche receives from organisations seeking medicine or diagnostic donations are evaluated for exceptional consideration only on an emergency basis and should be referred to the Corporate Donations and Philanthropy department.



# Information & Marketing

## We satisfy legitimate interests in information about our innovative products and services

As a research-focused healthcare company, Roche creates, produces and markets innovative diagnostic and therapeutic products and services that provide significant benefits. Our stakeholders have a legitimate interest in being informed about our products and services, including the results of our research and development activities.

We provide this information in a transparent, accurate and timely way to enable interested parties to take advantage of any progress we have achieved in medical science. We for example publish information about the results of our clinical trials on the Roche internet website. We support the medical education of healthcare professionals, e.g. by the provision of grants for independent medical education. Receiving information about advances achieved in medical science is in the interest of healthcare professionals and their patients.

Roche's interactions with healthcare professionals and healthcare organisations are aimed at exchanging scientific information that can help optimise the use of Roche's products and services. These interactions are based on standards of ethics, integrity and fair remuneration for services. The marketing of pharmaceutical and diagnostic products and all interactions with healthcare professionals and healthcare organisations are highly regulated. Roche is committed to complying with all applicable laws, regulations, industry codes and internal Roche processes and standards relating to good marketing practices and any interactions with healthcare professionals and healthcare organisations. To support compliance we have set up specific compliance functions (e.g. Group Healthcare Compliance Council, Pharma Healthcare Compliance Office).

Roche respects the legitimate undertakings of its competitors, including generic and biosimilar manufacturers. However, it is expected that they to comply with applicable laws, regulations and industry codes. Roche does not tolerate misleading claims which disparage its products, and protects its products and interests against unfair competition.

We are transparent with regards to our contributions to healthcare professionals and healthcare organisations and fully comply with all laws, regulations and industry codes requiring disclosure (e.g. US Sunshine Act, EFPIA Disclosure Code). We publish certain data voluntarily on a global level as part of our sustainability reporting, e.g. all contributions to healthcare organisations.

## We are all expected to:

- Comply with applicable laws, regulations, industry codes and Roche's internal processes and standards.
- Speak up and take immediate corrective measures in case of violations of these provisions.

**Further information and guidance:** Industry codes (e.g. IFPMA, PhRMA, EFPIA, Eucomed, AdvaMed, EDMA); Roche Pharma Directive on Interactions with HCPs and HCOs; Roche Diagnostics Divisional Standard on Interactions with HCPs and HCOs; Roche Pharma Directive on Grants, Sponsorships and Donations to Healthcare-Related Entities. These documents can be found on the Roche intranet (website of Group Legal Department). **Help & advice:** In case of questions regarding compliance with good marketing practices and any interactions with healthcare professionals and healthcare organisations, please contact your Line Manager, the local Compliance Officer, the Chief Compliance Officer, the Pharma Healthcare Compliance Office or the Roche Group Code of Conduct Help & Advice Line. **Speak up:** If you believe in good faith that in connection with business where Roche is involved someone has done, is doing, or may be about to do something that violates the provisions relating to good marketing practices or any interactions with healthcare professionals and healthcare organisations, speak up by using the available speak up channels.

**Q** I have been working on a marketing campaign for a new product. I am concerned that a proposed claim is not entirely accurate. Should I raise the issue?

**A** Yes. Speak up and address your concern with your Line Manager. We have a responsibility to ensure that any claim relating to our products and services is based on scientific evidence and is not misleading.

**Q** A friend asks me what principles define Roche's relationship to healthcare professionals. What should I answer?

**A** Roche's relationship to healthcare professionals is based on two key principles: (i) Roche is committed to providing information on its innovative products and services in an open, transparent, honest, timely and compliant way. (ii) Roche does not provide any improper advantages for prescribing its products.

**Q** What should I do if I notice a competitor making a misleading claim about a Roche product?

**A** Speak to your Line Manager so that appropriate actions can be taken to protect Roche's products and interests.







# Personal Integrity

## Conflict of Interest

### Personal interests must not unduly influence our professional judgment

As Roche employees we must avoid situations where personal interests conflict, or even appear to conflict, with the interests of Roche. A conflict of interest exists when an employee's personal interests are inconsistent with those of Roche and create conflicting loyalties.

Activities of relatives and close associates can cause conflicts of interest. We should not take part in, appear to take part in or exert influence on any decision that may put our own interest in conflict with the best interest of Roche.

We should not unduly use our position at Roche for personal benefit or to benefit relatives or close associates.

We must carefully consider the potential conflict of interest prior to the acceptance of secondary employment.

Professional engagements outside of Roche, including third-party board memberships, can result in conflicts of interest. Therefore, employees may accept a board membership in a third-party company, commercial entity or scientific advisory board only upon obtaining the prior approval of the relevant Roche executive in the organisation as defined in the Roche Directive on Employees Holding Board Memberships. No prior approval is required for board memberships of charitable, not-for-profit and non-commercial organisations (e.g. sports clubs, charities).

Many actual or potential conflicts of interest can be resolved in an acceptable way for both the individual and the company. In case of a conflict of interest, the employee concerned should immediately inform his/her Line Manager in order to find an appropriate solution.

### We are all expected to:

- Avoid situations in which our personal interests conflict with those of Roche.
- Not unduly use our position within Roche for personal benefit, the benefit of relatives or close associates.
- Inform our Line Manager as soon as we consider serving on the board of a third-party company, commercial entity or scientific advisory board.
- Immediately inform our Line Manager about any actual or potential conflict of interest in order to find an appropriate solution.

**Further information and guidance:** Roche Directive Behaviour in Business – Directive on Integrity in Business; Roche Directive on Employees Holding Board Memberships; eLearning program "Behaviour in Business – Addendum I" (RoBiB Add I). These materials can be found on the Roche intranet (website of Group Legal Department). **Help & advice:** In case of questions regarding the proper handling of a specific conflict of interest situation, please contact your Line Manager, the local Compliance Officer, the Chief Compliance Officer or the Roche Group Code of Conduct Help & Advice Line. **Speak up:** If you believe in good faith that in connection with a business where Roche is involved someone has done, is doing, or may be about to do something that violates the provisions regarding conflict of interest, speak up by using the available speak up channels.

**Q** My wife works as a manager for a supplier that is competing for a Roche contract. I can influence the selection process. What am I expected to do?

**A** There is an obvious conflict of interest because of your wife's position. You need to disclose this conflict of interest to your Line Manager and recuse yourself from the decision. He/she will decide whether the supplier your wife works for is in the best interest of Roche. If the supplier is in the best interest of Roche, your Line Manager may choose the supplier, despite the fact that your interests are linked.

**Q** A friend has just founded a biotech company and wants me to be on the board of directors. What should I do?

**A** As there might be conflicting interests, you need to inform your Line Manager. A Roche employee who wants to serve on the board of a third-party company needs prior written approval from the relevant Roche executive in the organisation (depending on the position, either the Chairman of the Board, the Chief Executive Officer or a Chief Executive Committee Member).

**Q** I am not sure whether a specific situation poses a conflict of interest. What should I do?

**A** In case of doubt, immediately inform your Line Manager in order to find an appropriate solution.

# Gifts & Entertainment

We neither give nor accept gifts or entertainment that could raise concerns about our personal integrity

Even when gifts or entertainment are exchanged out of the purest motives of personal or professional friendship, they can be misunderstood and perceived as an improper advantage to create influence.

We must not give or accept any gifts or entertainment that could raise any concerns regarding our personal integrity or Roche's integrity and independence.

To avoid both the reality and the perception of improper relations with existing or potential business partners, both public and private, Roche employees should adhere to the following principles:

## Giving Gifts & Entertainment

- Gifts or entertainment may be given only where appropriate and where there is no risk of creating the perception of influencing the recipient in his/her decision.
- Gifts must be of minimal value and entertainment must not go beyond what is reasonable. Expenditures for lavish or inappropriate gifts or entertainment are strictly prohibited.

## Receiving Gifts & Entertainment

- Demanding or soliciting gifts or entertainment of any kind is prohibited. This includes not only merchandise but all kinds of advantages.
- Unsolicited gifts or entertainment may only be accepted if they do not go beyond common courtesy and are an accepted local business practice.
- Offers of entertainment may only be accepted if they arise out of the normal course of business, cannot be seen as lavish and take place in settings that are appropriate.

If in doubt about the appropriateness of accepting an unsolicited gift or entertainment, we must consult our Line Manager and act according to his/her decision.

## We are all expected to:

- Make sure that the giving and acceptance of any gifts or entertainment does not raise any concern regarding our personal integrity and Roche's integrity and independence.
- Never solicit gifts or entertainment from any existing or potential business partners of Roche.
- Contact our Line Manager and act according to his/her decision, if in doubt about the appropriateness of accepting an unsolicited gift or entertainment.

**Q** A key Roche customer is having a dinner party to celebrate his company's 50th anniversary. Other important business people and government officials will be there. I have been invited. Am I allowed to accept the invitation?

**A** Yes, provided you are invited as a Roche representative and your Line Manager is in agreement.

**Q** A key Roche supplier has invited my wife and me for a golf weekend as a thank-you to a long-standing customer. May I accept?

**A** No. Accepting the invitation could compromise your and Roche's integrity and independence, especially as the invitation appears to be lavish and is extended to a family member who is unrelated to the business.

**Q** I have been working with a service provider for months and have finally reached the conclusion of the project. The service provider is now in town and asks me if I would like to go out for dinner with him as his guest, in the spirit of maintaining a good business relationship. May I accept the invitation?

**A** Yes, provided that it is a modest dinner and you can maintain personal and company integrity and independence. Unsolicited gifts or entertainment may be accepted provided they do not go beyond common courtesy and are an accepted local business practice. The value and frequency must not raise any suspicion of an obligation on the part of the recipient. The offer of any advantage that does not meet these conditions must be rejected.

**Further information and guidance:** Roche Directive Behaviour in Business – Directive on Integrity in Business; eLearning program "Behaviour in Business – Addendum I" (RoBiB Add I). These materials can be found on the Roche intranet (website of Group Legal Department). **Help & advice:** In case of questions regarding the proper handling of gifts and entertainment, please contact your Line Manager, the local Compliance Officer, the Chief Compliance Officer or the Roche Group Code of Conduct Help & Advice Line. **Speak up:** If you believe in good faith that in connection with a business where Roche is involved someone has done, is doing, or may be about to do something that violates the provisions regarding gifts and entertainment, speak up by using the available speak up channels.

# Insider Information & Trading

## We protect insider information and prevent insider trading

Insider information is defined as non-public information about Roche or its business partners which a reasonable investor would consider important in deciding whether to buy or sell the company's securities. Such information includes for example financial results and information about possible mergers, acquisitions or divestures, capital increases, capital market transactions, important licensing agreements and other collaborations as well as results from major clinical trials.

Roche employees who learn about insider information in the performance of their duties, whether intentionally or by coincidence, are considered insiders. Likewise, non-employees who obtain such insider information can also be considered as insiders.

Insiders must comply with the following rules:

- Insider information must be kept strictly confidential and may not be disclosed to any non-insider within or outside Roche, including family members;
- Insiders must not buy, sell or otherwise trade in securities of Roche or any other listed companies involved;
- Insiders must not provide trading recommendations to non-insiders.

In most countries insider trading is strictly illegal and the acting insider him-/herself as well as Roche may be penalised.

Roche complies with applicable insider trading laws and regulations and has established rules to protect insider information and prevent insider trading.

## We are all expected to:

- Protect insider information.
- Prevent insider trading for our own gain or anyone else's.
- Contact the Group Legal Department if we have a question or are uncertain about the scope or application of the Roche Group Insider Directive.

**Further information and guidance:** Roche Group Insider Directive; eLearning program "Behaviour in Business - Addendum I" (RoBiB Add I). These materials can be found on the Roche intranet (website of Group Legal Department).

**Help & advice:** In case of questions regarding the proper handling of insider information and trading, please contact your Line Manager, the Group Legal Department, the local Compliance Officer, the Chief Compliance Officer or the Roche Group Code of Conduct Help & Advice Line. **Speak up:** If you believe in good faith that in connection with a business where Roche is involved someone has done, is doing, or may be about to do something that violates the provisions regarding insider information and trading, speak up by using the available speak up channels.

**Q** Roche plans to acquire a diagnostic company. I am a member of the Roche task force preparing the acquisition. Since the transaction will have a positive impact on the share price of the target company, information about it is considered to be insider information. A friend of mine is interested in our industry and likes to talk with me about business developments. Am I allowed to share information about the transaction with him?

**A** No. Sharing this information would not only violate your secrecy obligations, but could expose you and your friend to prosecution if he used the information to buy securities in the target company. This would be insider trading, which is a criminal offence in most countries.

**Q** I hear a rumour that Roche intends to acquire another pharmaceutical company. Am I allowed to trade in securities of Roche or of the possible target company?

**A** Rumours do not count as insider information, so in principle the trading you are talking about would be ok. However, if your information is from a Roche source who might be involved in the transaction, you should be very careful and contact the Group Legal Department before buying or selling any securities.

**Q** I find a copy of mid-year results which are confidential and non-public. I believe that these results will have a material impact on the share price of the competitor. Based on this information, am I allowed to buy shares of the competitor's stock?

**A** No, you are not allowed to do anything with the confidential information, even if the information could be of use to you and the company. If the competitive information includes high-end results which are likely to have a material impact on the share price of the competitor, you are considered as an insider by coincidence and must comply with applicable insider rules.







# Corporate Integrity

## Business Integrity

### Roche's integrity depends on the behaviour of its employees

Business integrity is defined as both the actual and the perception of ethical behaviour in business that is in line with the Roche Group Code of Conduct and our commitment to run our business in a socially responsible way.

Business integrity means first and foremost that we adhere to all applicable laws and regulations as well as to the high integrity standards set forth by Roche. Complying with these standards is the right thing to do and a prerequisite for Roche's sustainable success.

Our stakeholders expect us to behave with integrity in all our business.

Adhering to our high integrity standards might lead to a loss of business in some cases. However, we are sure that doing so provides us with a business advantage.

Every Roche employee contributes to Roche's integrity as a company through his/her conduct.

Since Roche is doing business on a worldwide basis, employee misconduct in one country may have negative implications for Roche globally.

The terms and conditions that determine the appropriate behaviour in business must be assessed on a case-by-case basis by taking into consideration the relevant parameters of each individual case. Since legal standards evolve over time, a constant reassessment of the required business behaviour is necessary.

Roche gives its employees and its business partners the appropriate information, instruction, education, guidance and support they need to comply with Roche's standards of business integrity.

### We are all expected to:

- Adhere to all applicable laws and regulations as well as to the high integrity standards as set forth by Roche.
- Assess carefully, on a case-by-case basis, whether our business behaviour complies with Roche's expectations and standards of business integrity.
- Remember that Roche's integrity as a company depends on our behaviour.

**Further information and guidance:** Roche Directive Behaviour in Business – Directive on Integrity in Business; eLearning program "Behaviour in Business - Addendum I" (RoBiB Add I). These materials can be found on the Roche intranet (website of Group Legal Department). **Help & advice:** In case of questions regarding business integrity, please contact your Line Manager, the local Compliance Officer, the Chief Compliance Officer or the Roche Group Code of Conduct Help & Advice Line. **Speak up:** If you believe in good faith that in connection with a business where Roche is involved someone has done, is doing, or may be about to do something that violates Roche's business integrity, speak up by using the available speak up channels.

**Q** I recently received an ambitious sales target. To reach the target and earn a bonus, I have to violate Roche's standards of business integrity. Am I allowed to do that?

**A** No. You are required to comply with Roche's standards of business integrity at all times. Discuss the situation openly with your Line Manager and find a solution that is in line with Roche's standards of business integrity.

**Q** My Line Manager asks me to do something which in my opinion is not in line with Roche's standards of business integrity. What am I expected to do?

**A** Immediately tell your Line Manager about your reservations. This may take courage, but it is the right thing to do. And remember, you are the one who is ultimately responsible for your business behaviour. If your Line Manager insists or asks you to keep quiet, you should immediately contact the local Compliance Officer or the Chief Compliance Officer. Alternatively, you can also use the Roche Group SpeakUp Line.

# Bribery & Improper Advantages

We do not tolerate bribery or any other form of corrupt business behaviour

Roche rejects all forms of corrupt business behaviour, such as bribery (public, private, active and passive), embezzlement, fraud, theft and the granting of improper advantages. The Roche Directive on Integrity in Business provides further guidance on these topics.

## Bribery

Roche employees and its business partners are not allowed to give, promise to give, solicit or accept any form of improper advantage, whether directly or indirectly, to or from any individual or organisation with the intention to obtain or retain business in return. Improper advantages include illegal rebates, bribes, kickbacks and under-the-table payments. An improper advantage can be anything of value, including but not limited to payments, meals, gifts, entertainment, travel expenses or fake agreements.

## Granting of Improper Advantages

Equally prohibited is to give or promise to give an improper advantage without a specific business decision in mind. In contrast to the bribery definition, there is no “service in return”. The improper advantage can therefore be seen as a “goodwill” payment to increase the sympathies towards the giver.

Roche employees have to keep in mind that perception matters and that their behaviour could be considered as a bribe or granting of an improper advantage, regardless of their intention.

These principles apply globally to all public and private business transactions involving Roche. Many countries have laws making it a crime to bribe and/or to grant an improper advantage to public officials. Violation of these laws or other laws that prohibit unfair competitive practices can result in criminal and civil actions against Roche and the individuals involved.

Provided all the requirements as specified in the Roche Directive on Integrity in Business are met and applicable local approvals are obtained, advantages to business partners and other third parties may be permissible.

## We are all expected to:

- Comply with the requirements as set forth in the Roche Directive on Integrity in Business.
- Not practice, tolerate or in any form support any corrupt business behaviour.
- Never give, promise to give, solicit or accept any form of improper advantage.
- Carefully check whether the granting of an advantage is in compliance with Roche’s standards of business integrity.

**Further information and guidance:** Roche Directive Behaviour in Business – Directive on Integrity in Business; Roche Pharma Directive on Interactions with HCPs and HCOs; Roche Diagnostics Divisional Standard on Interactions with HCPs and HCOs; Roche Good Practice Guidelines on Working with Government Officials; Roche Anti-Corruption Compliance Questionnaire for Roche Business Partners (self-assessment tool); Roche Anti-Corruption Compliance Assurance Confirmation of Roche’s Business Partners; eLearning program “Behaviour in Business - Addendum I” (RoBiB Add I). These materials can be found on the Roche intranet (website of Group Legal Department). **Help & advice:** In case of questions regarding bribery and improper advantages, please contact your Line Manager, the local Compliance Officer, the Chief Compliance Officer or the Roche Group Code of Conduct Help & Advice Line. **Speak up:** If you believe in good faith that in connection with a business where Roche is involved someone has done, is doing, or may be about to do something that violates the provisions regarding bribery or improper advantages, speak up by using the available speak up channels.

**Q** I negotiated a speaker agreement with a healthcare professional (HCP) for a Company oncology event. Before the event, the HCP informs me that he will not be able to come and act as speaker. My Line Manager believes this HCP is important to our business and therefore requests to proceed with the contract to ensure he is paid even though he will not be speaking at the event. What shall I do?

**A** You should immediately inform your Line Manager about your concerns and that you will not proceed with the contract because paying the HCP for services not rendered would be considered a bribe. If your Line Manager insists or asks you to keep quiet, you should immediately contact the local Compliance Officer or the Chief Compliance Officer. Alternatively, you can use the Roche Group SpeakUp Line.

**Q** According to local customs it is the socially acceptable practice to give a small gift to a business partner for the new year. Is this permissible?

**A** Yes, provided all the requirements as set forth in the Directive on Integrity in Business are met, as well as the applicable local approvals are obtained.

**Q** Is a facilitation payment in the form of a small bribe permissible?

**A** No, according to our Roche Group Code of Conduct and many national laws, any form of bribe, regardless of the amount, is prohibited. Thus, any facilitation payments are forbidden unless such payments can be qualified as permissible advantages.

# Competition Law

## Violating competition laws never pays

Competition laws – also referred to as antitrust laws – are designed to protect competition. They prohibit business behaviour which has the objective or the effect of preventing, restricting or distorting competition (e.g. price fixing and the allocation of markets or customers).

Roche supports all efforts to promote and protect competition, including the legitimate protection of intellectual property and marketing rights.

Roche has set up a comprehensive antitrust compliance program. Employees who have to deal with competition issues in their work are expected to understand the basic principles of competition law and the importance of complying with such laws. If an answer to a specific antitrust question is not clear, employees must seek help and advice.

The penalties for breaching competition laws are severe. In addition to Roche's liability as a company, employees who engage in anticompetitive behaviour will be subject to penalties.

Despite Roche's commitment to complying with applicable competition laws, Roche may become the subject of an unannounced investigation by antitrust authorities (called a "dawn raid"). In the event of an investigation, Roche will fully cooperate with the investigators and will not destroy any documents, data or official seals.

Roche employees involved in a tender process must be aware of and comply with the applicable tender law regulations. Transparency must be maintained throughout the procurement cycle by adhering to applicable formal procedures and provide the governmental decision makers with correct, transparent and non-discriminatory data.

Roche respects the legitimate undertakings of its competitors, including generic and biosimilar manufacturers. However, it is expected that they comply with applicable laws, regulations and industry codes. Roche does not tolerate misleading claims which disparage its products, and protects its products and interests against unfair competition.

## We are all expected to:

- Comply with applicable competition laws and not disturb or hinder legitimate competition in any anticompetitive manner.
- Seek legal advice in case of any doubt.
- Fully cooperate with the authorities in the event of an investigation.

**Further information and guidance:** Roche Directive Behaviour in Competition – A Guide to Competition Law; Roche Guideline on Competition Law Investigation ("Dawn Raid"); Roche Guideline on Tenders; Roche Questionnaire Behaviour in Competition Compliance (self-assessment tool); eLearning program "Competition Law Interactive Dialogues" (RoCLID). These materials can be found on the Roche intranet (website of Group Legal Department). **Help & advice:** In case of questions regarding compliance with competition laws, please contact your Line Manager, the Group Legal Department, the local Compliance Officer, the Chief Compliance Officer or the Roche Group Code of Conduct Help & Advice Line. **Speak up:** If you believe in good faith that in connection with a business where Roche is involved someone has done, is doing, or may be about to do something that violates the provisions regarding competition laws, speak up by using the available speak up channels.

**Q** I work in the Marketing Department and know a competitor is granting high rebates to customers in order to enhance its market share. May I contact this competitor and agree on the sales prices and on allocating certain customers and markets?

**A** No. Jointly determining sales or purchase prices and allocation of customers and markets is a serious violation of competition law. Roche strictly prohibits such anticompetitive behaviour by its employees.

**Q** Antitrust authorities have started an investigation ("dawn raid") in the Roche company where I work. Some recent correspondence I had with a Roche competitor is making me nervous because it might be construed as evidence of anticompetitive behaviour. Should I destroy the correspondence?

**A** No. Under no circumstances may any documents or data which could be relevant to an antitrust investigation be destroyed (for further details see chapter "Records Management"). In the event of an investigation, Roche will fully cooperate with the authorities.

**Q** We are invited to tender. During an industry association meeting I agree with my competitors not to bid for the tender. Is this behaviour allowed?

**A** No, this behaviour is an anticompetitive behaviour and thus a violation of competition law.

# Accurate Reporting & Accounting

We create and report true and fair financial and non-financial information

Data integrity is key to our business.

We ensure that any data, information or records which we create, or for which we are responsible, are true and fair. These can take many forms, ranging from the Roche annual report, research and development data, to our personal travel and expense claims or even our e-mails.

Roche must comply with applicable laws and external accounting standards and ensure that the information it supplies to its auditors and stakeholders, such as equity and debt investors, as well as regulatory agencies and government bodies provides a true and fair view of its financial situation.

We must never make a false or misleading statement or entry in any report, publication record or expense claim.

Falsifying records and accounts or misrepresenting facts may constitute fraud. In addition to Roche's liability as a company, employees who engage in such illegal behaviour may be subject to severe penalties.

**Q** We are approaching the end of our reporting period and my Line Manager has asked me to book sales that he expects from a certain customer, even though we do not have a firm order from the customer yet. Is this okay?

**A** No. Falsifying records and accounts or misrepresenting facts may constitute fraud and in addition to disciplinary action, could result in civil and criminal penalties for you as well as for Roche. Never make false or misleading entries in any Roche document.

**Q** I have been travelling a lot on business lately and have lost some of my hotel receipts. A colleague who has been in this situation says it is okay to submit a few fictitious receipts. Is it?

**A** No. If you do that, you will be falsifying your expense report, and that is not acceptable. You should talk to your Line Manager to find an appropriate solution.

## We are all expected to:

- Make sure any financial or non-financial information we create or report is true, fair and complete.
- Never misrepresent facts in any Roche report, publication, record or other document.

**Further information and guidance:** The Roche Group Reporting Manual can be found on the Roche intranet (website of Group Finance and Group Legal Department). **Help & advice:** In case of questions regarding accurate reporting and accounting, please contact your Line Manager or the local financial experts. **Speak up:** If you believe in good faith that in connection with a business where Roche is involved someone has done, is doing, or may be about to do something that violates the provisions regarding accurate reporting and accounting, speak up by using the available speak up channels.

# Taxes

## We are committed to complying with the tax laws in any country where we operate

Roche operates around the globe and it is our obligation to comply with the tax requirements in any country where we operate. This includes tax obligations for all kind of taxes: in the case of Roche mainly income taxes and sales or value-added taxes.

Income taxes are payable based on taxable income. The taxable income of a group company depends substantially on transfer prices for goods and services bought from or sold to other group companies. Tax authorities may claim higher taxable income by asking for lower transfer prices on purchases and/or higher transfer prices on sales. As a consequence, higher taxable income may result for one party involved in the transaction. If the tax authority of the other country involved in the transaction does not adjust income correspondingly, income adjustments of the first country lead to double taxation for Roche.

In order to avoid or at least reduce the probability of double taxation, Roche companies apply the "OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations" for cross-border transactions of goods and services. This includes the application of the correct transfer pricing method based on the analysis of the functions performed and risks assumed as well as appropriate documentation.

In particular cases Roche and the respective tax authority may disagree on the correct application of local tax law and the OECD transfer pricing guidelines. Furthermore, the national tax authority of one country could have a different opinion from a national tax authority of another country with regard to transfer prices applied. In some cases there may even be inconsistencies between national authorities within the same country as e.g. customs and tax laws are not always aligned and consistent. However, Roche is committed to complying with tax laws. In the event of disputes, it contributes with the respective authorities in a positive spirit to find balanced solutions in accordance with the applicable laws.

## We are all expected to:

- Comply with the tax laws in the countries where we operate.
- Apply transfer pricing in accordance with OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations.
- Contribute actively and positively to solutions in the event of conflicts with local tax authorities or between national authorities.

**Further information and guidance:** Further information and guidance can be found on the Roche intranet (website of Group Finance). **Help & advice:** In case of questions regarding taxes, please contact the local person responsible for tax or Group Tax. **Speak up:** If you believe in good faith that in connection with a business where Roche is involved someone has done, is doing, or may be about to do something that violates the provisions regarding taxes, speak up by using the available speak up channels.

**Q** I have different options for a planned product flow and the respective pricing. I am not sure about the tax consequences of the different options (e.g. with regard to income tax and other tax such as value-added tax). What should I do?

**A** Contact the local person responsible for tax or your contact person in Group Tax for coordination between the different countries involved.

**Q** I doubt that the actual or foreseen terms and conditions in an intercompany contract meet arm's length standards as per OECD transfer pricing guidelines or local law.

**A** Involve your contact person in Group Tax for further discussion.

**Q** What do I do if tax authorities question transfer prices on cross-border transactions?

**A** Contact the responsible person in Group Tax to analyse the situation further and take appropriate action to comply with local laws and OECD transfer pricing guidelines, and in order to avoid double taxation.



# Customs, Trade & Export Control

## Key to our effective and efficient flow of goods

All transactions, regardless if they are crossing borders or transferred within the same country, may be subject to national and international customs, trade and/or export control regulations.

As doing foreign trade business is a privilege, Roche is committed to complying with all customs, trade and export control regulations, taking into consideration potential conflicting regulations among the countries in which we operate. The failure to do so can result in civil and criminal liability and loss of export privileges.

### Customs and Trade

Roche operates around the globe and processes daily imports, exports and transits of a variety of goods. As goods shall timely pass customs clearance all shipments of goods have to be prepared by a logistics department, following expert guidance to ensure adherence to national and international regulations.

Customs law is applicable regardless of quantity, type of material or mode of transportation. The customs authorities not only review adherence to customs law but perform other tasks at the border for local authorities in charge of, e.g. veterinary, agricultural, medicinal, regulatory, fiscal and intellectual property regulations. This also applies to goods provided free of charge.

### Export Control

All Roche employees engaged in foreign trade activities must refrain from transactions recognised as not being permissible by the national or international export control regulations or the internal directive known as the Roche Standard Export Control.

Before engaging with new business partners, employees must ensure that there is no respective entry on any national or international sanctioned party lists. Before processing an export of commercial or non-commercial commodities, software or technology, physically or electronically, within or outside Roche, employees must ensure that the item is not controlled and does not require an export/re-export licence from the authorities. Some destinations are subject to comprehensive foreign trade controls, also known as embargo or sanctions, and require additional control prior to proceeding.

## We are all expected to:

- Communicate in a timely manner with truthful and complete information.
- Check for compliance with national and international customs, trade and export control regulations when developing and adapting processes.
- Contact the related expert department in a timely manner in case of questions or to address an error.

**Q** I am preparing the documents of a cross-border shipment. What do I have to be aware of?

**A** Every employee asking for the shipment of goods is accountable for providing complete and truthful information for export or import processing. Be aware that there are restrictions and prohibitions on certain kinds of shipments to certain locations. Contact your local Export Control Officer for further details.

**Q** I want to export some US IT equipment to a Roche colleague abroad. Do I really need to check customs, trade and export regulations as this is going to stay within Roche?

**A** Yes. You should seek guidance from your local logistics department and your local Export Control Officer before processing any shipment.

**Q** If I notice an error, what are my obligations?

**A** If you notice an error, you are obliged to timely contact the related expert department to address the issue and contribute to problem solving and implementation. Ultimately, this constructive behaviour contributes to protect Roche's right to operate.

**Q** What are the consequences if I violate the customs, trade or export control regulations?

**A** Roche does not tolerate any violation of the regulations and will take appropriate corrective measures and sanctions. You will be held accountable for your behaviour.

**Further information and guidance:** The Roche Standard Export Control Policy can be found on the Roche intranet (website of Export Compliance). **Help & advice:** In case of questions regarding export control, please contact your local Export Control Officer or the Chief Export Control Officer. In case of questions regarding customs and trade, please contact the International Trade Affairs & Customs Department. **Speak up:** If you believe in good faith that in connection with a business where Roche is involved someone has done, is doing, or may be about to do something that violates the regulations of customs, trade and export control, speak up by using the available speak up channels.

# Data Privacy

## We process personal data with due care

Roche operates around the globe, using various electronic systems to process, exchange and share information between units within the Roche Group and with third parties. Increasing cooperation in all fields entails the exchange of personal data. This trend is reinforced by the increasing use of modern telecommunications and electronic collaboration tools and platforms.

Roche is committed to respecting data privacy and has developed principles that must be consistently applied when processing personal data within the Roche Group and by its business partners.

Being active in clinical and genetic research, Roche must ensure that identifiable health information is carefully processed. Roche takes due care to prevent any misuse of or unauthorised access to such identifiable health information within its control.

All processing of personal data (e.g. data on employees, business partners, customers and suppliers) must be in compliance with applicable data privacy laws and the Roche principles.

## We are all expected to:

- Ensure that we process personal data with due care and only for the defined legitimate purpose it was collected for and in compliance with applicable laws and Roche principles.
- Never collect more personal data than needed for a particular defined purpose.
- Store personal data for the shortest possible time only as they are needed for the purpose such data were collected for.

**Further information and guidance:** Roche Directive on the Protection of Personal Data; Roche Charter on Genetics. These documents can be found on the Roche intranet (website of Group Legal Department). **Help & advice:** In case of questions regarding compliance with accurate protection and processing of personal data, please contact your Line Manager, the local Data Privacy Coordinator or the Group Privacy Officer. **Speak up:** If you believe in good faith that in connection with a business where Roche is involved someone has done, is doing, or may be about to do something that violates the provisions regarding data privacy, speak up by using the available speak up channels.

**Q** I work in a clinical research unit and have access to identifiable health information which I would like to share with a colleague. Is this okay?

**A** Being active in clinical and genetic research, Roche has to ensure that identifiable health information is processed with care and diligence. As a Roche employee you have a strict obligation to treat such information as confidential and to share it only with colleagues who need to know in order to do their work, in accordance with the purpose the data was obtained for and only if and as allowed under applicable law.

**Q** Roche wants to collaborate with a third party that is processing data in or accessing our data from another country. What do I have to consider?

**A** Any exchange of personal data with another entity or person, i.e. between companies of the Roche Group or with third parties, requires adequate measures to be in place which ensure continued compliance with data privacy laws and the Roche principles, in particular if personal data are transferred across country borders.

**Q** I am using a company laptop to write personal e-mails regarding non-business-related topics. I am notified that I am now part of an investigation regarding a potential non-compliant behaviour of a fellow colleague. Because of this, my laptop is screened by a prosecutor. Is the external investigator allowed to review my personal e-mails?

**A** Your e-mails may be reviewed internally or externally in the context of investigations or legal action. Roche or authorities may have the right or reasons which justify accessing your company devices or IT accounts, which may result in them also becoming aware of the content of any private communication. Always bear in mind that privacy for data on company devices or systems is not unreservedly granted, even if such information stems from appropriate personal use.





# Employment

## Employment at Roche

We offer attractive challenges and set high standards

Roche offers its employees around the world an innovative, growth-oriented and challenging workplace.

The Roche Values – Integrity, Courage and Passion – are meant to guide our decisions and actions as individuals and as an organisation. They are the pillars of our corporate culture and apply throughout the Roche Group.

Roche is committed to promoting mutual respect and trust.

The Roche Group Employment Policy establishes uniform minimum standards for all Roche companies and employees. This policy addresses topics such as recruitment, promotion, career development, remuneration, diversity, prohibition of forced and child labour, freedom of affiliation, and it states what Roche expects from its employees.

Roche respects the right of all employees to join any legally recognised employee association and will comply with any laws relating to employee representation. Roche strives to maintain an open dialogue with all employee representatives.

Our seven Leadership Commitments set clear expectations for all our people leaders at Roche and represent our leadership promise to our employees. Regardless of area of work or level, Roche expects every leader at Roche to demonstrate these commitments day in day out:

*I firmly believe that each person at Roche deserves a great leader. Every day I strive to lead by example, consistently demonstrating our values of Integrity, Courage and Passion. This means:*

- 1. I take a genuine interest in people.*
- 2. I listen carefully, tell the truth, and explain "the why".*
- 3. I empower and trust people to make decisions.*
- 4. I discover and develop the potential in people.*
- 5. I strive for excellence and extraordinary results.*
- 6. I set priorities and simplify work.*
- 7. I congratulate people for a job well done.*

We regularly run a global employee opinion survey (GEOS) to solicit candid, anonymous feedback on needs and expectations to enable identification of areas for improvement. These surveys are also used to determine the level of engagement within the company.

### We are all expected to:

- Behave in line with Roche Values.
- Live up to Roche's expectations.
- As a leader demonstrate the Leadership Commitments day in day out.

**Further information and guidance:** Roche Position Paper on Respecting Human Rights; Roche Group Employment Policy. These documents can be found on the Roche internet and intranet (website of Group Legal Department). **Help & advice:** In case of questions regarding employment issues, please contact your Line Manager or the local HR Department. **Speak up:** If you believe in good faith that in connection with a business where Roche is involved someone has done, is doing, or may be about to do something that violates the provisions regarding employment policy or labour laws, speak up by using the available speak up channels.

**Q** What are the three Roche Values that apply throughout the Roche Group?

**A** Integrity, Courage and Passion.

**Q** What do the Roche Values mean for my daily work?

**A** They are meant to be put into practice. Use them in your daily work as a guide for your decisions and actions.

**Q** I am interested in employment issues. Where can I find information about Roche's position on forced and child labour?

**A** In the Roche Position Paper on Respecting Human Rights and in the Roche Group Employment Policy.

**Q** Why do we have the seven Leadership Commitments?

**A** They set clear expectations for all our people leaders at Roche and represent the leadership promise to the employees. Regardless of area of work or level, Roche expects every leader at Roche to demonstrate these commitments day in day out.



# Discrimination & Harassment

## We value diversity and inclusion as part of an inspiring working environment

Roche has always been open to new and different approaches, doing business in numerous countries with many different cultures. Diversity not only offers advantages, but needs careful management to avoid misunderstandings and conflicts. The value of diversity is realised through this careful management. At Roche we value and manage diversity through an inclusive environment, since we are convinced that it is critical in helping to drive innovation as well as build employee engagement. The variety in backgrounds, cultures, languages, thoughts and ideas of our people helps us to maintain a competitive edge.

Roche's inclusive culture means that we value the differences in our employees and we actively work to create an environment where all have the ability to share new ideas and ways of working, and realise our full potential.

Roche is committed to fair and equal treatment of all employees and all people who seek employment at Roche, including equal opportunities for development and advancement. We do not tolerate any form of discrimination or harassment in the workplace.

There is no acceptance of employees being subjected to offensive, abusive or other unwanted behaviour at the workplace which violates the personal dignity of the victim or creates an intimidating, hostile or humiliating environment for the victim (e.g. physical, sexual, psychological, verbal or any other form of harassment).

It is Roche's policy to ensure that the behaviour of its employees does not discriminate against anyone on the grounds of gender, age, ethnicity, national origin, religion, disability, sexual orientation, HIV/AIDS infection, citizenship, genetic information or any other relevant characteristic protected under the applicable law.

These principles apply to all aspects of the employment relationship, such as hiring, assignments, promotion, compensation, discipline and termination.

If we believe that anybody has been subjected to discrimination or harassment, we should report this misbehaviour.

## We are all expected to:

- Treat diversity and inclusion as a priority and opportunity for our business success.
- Ensure we do not discriminate against anyone.
- Never engage in any form of workplace harassment.
- Speak up if we become aware of any workplace discrimination or harassment.

**Q** Why does Roche value diversity?

**A** As a company that has always been open to new and diverse technologies and approaches, Roche has been setting medical milestones since the beginning. Diversity is not only a key prerequisite for innovation, but also a personal and cultural job enrichment for each and every employee.

**Q** I get the impression that my Line Manager does not like me and has started to harass me in various ways. What should I do?

**A** Addressing your concerns immediately, openly and directly to your Line Manager is in many cases the best solution, since it offers you and your Line Manager the opportunity to clarify the situation. However, there might be circumstances in which you prefer to speak on a confidential basis with a representative of the HR Department or with the local Compliance Officer. Alternatively you can use the Roche Group SpeakUp Line.

**Further information and guidance:** Roche Group Employment Policy; Roche Guideline on HIV/AIDS in the workplace. These documents can be found on the Roche intranet (website of Group Legal Department). **Help & advice:** In case of questions regarding discrimination and harassment issues, please contact your Line Manager, the local HR Department, the local Compliance Officer, the Chief Compliance Officer or the Roche Group Code of Conduct Help & Advice Line. **Speak up:** If you believe in good faith that in connection with a business where Roche is involved someone has done, is doing, or may be about to do something that violates the provisions regarding discrimination and harassment, speak up by using the available speak up channels.



# Safety, Security, Health & Environment

We promote and provide a safe, secure and healthy workplace as well as a clean environment

Safety, security, health and environmental protection (SHE) are integral parts of our operations and as such we approach them with the same level of commitment as we do with any business-related activities.

As part of our commitments towards sustainable development we proactively seek to employ new, more sustainable technologies and processes to minimise our impact on the environment.

Roche's operations are conducted in compliance with applicable health, security, safety and environmental laws and regulations, company standards and best practices. We take all reasonable and practical steps to ensure that we provide a safe, secure, healthy and clean working environment.

The Roche safety, security, health and environmental protection policy is implemented in a systematic manner by means of all necessary technical, organisational and personal measures.

We strive for continuous improvement wherever possible and economically viable. We regularly monitor our performance to ensure compliance with our standards and objectives as well as to ensure our behaviour, processes and equipment are state-of-the-art.

Every employee is personally responsible for safety, security, health and environmental protection at the workplace to the full extent required by his/her duties to the best of his/her knowledge, ability and experience. We are all encouraged to identify areas for improvements and continuously work towards a better environment.

## We are all expected to:

- Ensure safety and security, and protect health and the environment at our workplace to the best of our knowledge, ability and experience.
- Integrate considerations regarding safety, security, health and environment into our daily work.
- Report concerns relating to safety, security, health and environment.

**Further information and guidance:** Various Roche Position Papers (e.g. Roche Position Paper on SHE in the Supply Chain; Roche Position Paper on Pharmaceuticals in the Environment); Roche Policy on SHE in the Roche Group; Roche Guidelines for the Assurance of SHE in the Roche Group; eLearning program "Safety, Security, Health and Environmental Protection" (RoSHE). These materials can be found on the Roche intranet (website of Group SHE and Group Legal Department) and partially on the Roche internet. **Help & advice:** In case of questions regarding safety, security, health and environment issues, please contact your local SHE-Manager. **Speak up:** If you believe in good faith that in connection with a business where Roche is involved someone has done, is doing, or may be about to do something that violates the provisions regarding SHE, speak up by using the available speak up channels.

**Q** How important is the protection of the environment for Roche?

**A** The protection of the environment has a high priority for Roche. As part of our commitments towards sustainable development we proactively seek to employ new, more sustainable technologies and processes to minimise our impact on the environment. Roche is globally recognised as a leader in its efforts for the protection of the environment. Each and every Roche employee can, and should, within the sphere of his/her responsibilities and influence, contribute to the protection of the environment.

**Q** We have an issue affecting several departments and countries. We plan for a meeting, bringing together different teams to discuss this topic. What should we consider regarding SHE?

**A** Air travel has a significant impact on the total eco-balance of Roche. We therefore need to minimise business flights through the following considerations: Hold the meeting as a video / telepresence conference. If a meeting in person is needed, reduce the number of participants – send a competent representative instead of a whole team. Choose a location which minimises the total miles. Combine the business trip with others to reduce the miles.



# Company Assets

## Intellectual Property Rights

### Intellectual property rights are key to our business

With our discovery, development and delivery of innovative medicines and diagnostics we help to treat serious and life-threatening diseases. With its business model, Roche is dependent on intellectual property rights and their efficient protection.

Intellectual property laws protect Roche's valuable assets – our patents, trademarks, regulatory data, copyrights, trade secrets, domain names and related rights. Roche supports initiatives which are designed to foster a legal and regulatory environment which protects intellectual property rights.

Roche is committed to respecting the intellectual property rights of third parties. Roche expects that all its employees take the intellectual property rights of third parties into due consideration in their daily work.

Whenever our intellectual property rights are violated, Roche defends its rights. Violation of intellectual property rights does not only harm the assets of Roche, but in many cases is also a threat to the health and safety of patients; e.g. counterfeit pharmaceutical and diagnostic products are illegal and pose a significant global public health problem. Roche undertakes appropriate measures against counterfeits within the sphere of its influence.

Public health takes advantage of the development of a medicine far beyond the period of patent protection; e.g. more than twenty medicines developed by Roche are deemed Essential Medicines by the World Health Organization (WHO). Almost all of them are no longer under patent protection and include lifesaving antibiotics, antimalarials and medicine for chemotherapy. These products would not exist without a robust patent system which encourages investments in innovation. They are witness to Roche's substantial and sustained contribution to global health even after loss of exclusivity.

We recognise that flexibility around patents in some of the poorest countries can help broaden access to medicines. For that reason, we do not file for new patents or enforce existing patents in least developed countries, as defined by the United Nations, or in low-income countries, as defined by the World Bank.

### We are all expected to:

- Protect Roche's intellectual property rights.
- Respect the intellectual property rights of third parties and to clarify the situation with the experts in case of doubts.

**Q** Why are intellectual property rights key to Roche's business?

**A** Intellectual property rights such as patents, trademarks, regulatory data, copyrights, trade secrets and domain names are valuable assets of our business. They enable us to pursue our business model of innovation.

**Q** What can I do as an employee to protect Roche's intellectual property rights?

**A** Whenever you become aware that any of Roche's intellectual property rights are violated by a third party, speak up and inform your Line Manager. Your contribution helps to protect Roche's valuable assets.

**Q** I work in the Marketing Department and would like to copy an article from a scientific magazine and to distribute it to the participants of a workshop. Am I allowed to do so?

**A** You have to keep in mind that copyrights of third parties have to be taken into due consideration on a case-by-case basis. If you have any doubts about the copyright situation, seek clarification from the Copyright Checkpoint on the Roche intranet.

**Further information and guidance:** Roche Position Paper on Counterfeiting; Roche Brochure "Improving access: overcoming barriers"; Roche Directive on the Protection of Digital Content Copyrights. These documents can be found on the Roche intranet (website of Group Legal Department). In addition, the book "Lifesavers for millions" has been published by Editiones Roche, **Speak up:** If you believe in good faith that in connection with a business where Roche is involved someone has done, is doing, or may be about to do something that violates the provisions regarding intellectual property rights, speak up by using the available speak up channels.

# Confidential Information

## We handle confidential information carefully to protect Roche's assets and interests

As Roche employees we do in many ways have access to confidential information related to our business; this includes confidential information about research and development projects, manufacturing methods, business plans, financial data, marketing and sales strategies, launch of new products, merger or acquisition activities etc.

We respect the confidential information belonging to third parties. If we share confidential information with a third party, any exchange of such information is subject to the signing of a confidentiality agreement.

We have to be aware that in a competitive environment, third parties strive to get access to confidential information related to our business. Competitive intelligence activities by third parties are part of our industry. We must be extremely careful how we handle confidential information in public places, such as airplanes, trains, trams, bars and restaurants.

Secrecy obligations are part of the employment contract and will continue to be in force after the end of employment.

## We are all expected to:

- Only share confidential information with a person who needs to know said information and who is entitled to get this information.
- Be aware of competitive intelligence activities by third parties that could harm Roche's assets and interests.
- Respect the contractual secrecy obligation even after the end of the employment contract.

**Further information and guidance:** Your employment contract; The Roche Competitive Information Guidelines for Employees and the eLearning program "Competitive Intelligence Sensitization" (RoCIS) can be found on the Roche Intranet (website of Group Legal Department). **Help & advice:** In case of questions regarding confidential information, please contact the local competitive intelligence managers or the Group Legal Department. **Speak up:** If you believe in good faith that in connection with a business where Roche is involved someone has done, is doing, or may be about to do something that violates the provisions regarding confidential information, speak up by using the available speak up channels.

**Q** I am working for Roche. My cousin has recently started to work for another company in the same industry. She is keen to talk with me about the differences and similarities between Roche and her new employer. How much am I allowed to say?

**A** You should be very careful what you say, even if you talk to a close member of your family. Ask yourself whether the information you are sharing is available to the general public. If not, you should not share the confidential information with your cousin, because she is an unauthorised person.

**Q** I have just joined Roche from a competitor and brought with me lots of information which I think would be useful to the company. Is it okay to share said information with my new team?

**A** No. You are not allowed to share information if it is of a confidential nature. Even after you have left the company, the information remains confidential. You must respect the contractual secrecy obligation even after the end of the employment contract with your former employer.

**Q** I am flying together with a Roche colleague to New York and discuss confidential results of an ongoing clinical trial with her. Is this okay?

**A** Always be alert to the competitive intelligence activities of third parties! You must be extremely careful how you handle confidential information in public places, such as airplanes, trains, trams, bars and restaurants.

# Electronic Communication Tools

## We use electronic communication tools and social media carefully

The term “Roche electronic communication tools” covers the company’s own

- hardware such as telephones, fax machines, computers, mobile phones and handhelds
- social media and collaboration tools, e.g. e-mail, messenger, intranet and internet systems such as blogs, wikis, forums etc.

Roche electronic communication tools are to be used in principle and primarily for Roche’s business purposes. As a general rule and provided no further local restrictions apply, Roche employees are allowed to use Roche electronic communication tools in exceptional cases for personal use, provided all preconditions as set forth in the corresponding Roche Directive are met. Personal use means every instance of use that is not directly related to Roche’s business purposes.

Roche employees who have access to Roche electronic communication tools must use them with due care and ensure that they are not damaged, lost or otherwise misplaced. In addition, Roche employees must comply with Roche IT security standards, e.g. they are not allowed to install software that is banned or connect hardware to Roche system that has not been approved. In the event of theft or other loss of a Roche electronic communication tool, immediately inform the local service desk.

Data privacy in connection with the use of Roche electronic communication tools is not unreservedly guaranteed; it may be rescinded in accordance with the applicable Roche data privacy principles and standards.

Roche recognises the benefits of social media (e.g. blogs, microblogs, wikis, communities, social networking sites), but expects that employees make use of these platforms, whether they are operated by Roche or not, in a responsible way in line with the guiding Social Media Principles. Specifically, communications about our products are highly regulated. Thus it is not allowed to comment on or about any Roche product unless expressly authorised to do so. A prior review and approval from the local communications department must be sought in order to conduct online activities “on behalf of the Company”. If an employee creates a Roche external digital channel (e.g. Roche websites, Roche Social Media pages), the channel must be registered in the Global Digital Registry.

## We are all expected to:

- Use Roche electronic communication tools in principle and primarily for Roche’s business purposes and handle these tools with due care.
- Comply with Roche Directives, Policies, Guidelines, IT security and other applicable standards.
- Inform the local service desk immediately whenever a Roche electronic communication tool is lost or stolen.
- Use social media, whether operated by Roche or not, in a responsible way in line with the guiding Roche Social Media Principles.
- Register any Roche external digital channel.

**Further information and guidance:** Roche Directive Electronic Communication Tools; Information Security Policy; Social Media Principles; Wikipedia Guiding Principles; Promotional Practices for the Diagnostic Division; eLearning program “Roche Information Security End User Awareness Training”. These materials can be found on the Roche intranet (website of Group Communications and Group Legal Department). **Help & advice:** In case of questions regarding electronic communication tools, please contact your local IT specialists. In case of questions regarding the registry of an external channel, please visit the Global Digital Governance intranet website. **Speak up:** If you believe in good faith that in connection with a business where Roche is involved someone has done, is doing, or may be about to do something that violates the provisions regarding the use of electronic communication tools, speak up by using the available speak up channels.

**Q** Am I allowed to use Roche electronic communication tools for personal use?

**A** Roche electronic communication tools are to be used in principle and primarily for Roche’s business purposes; however and unless there are further local restrictions, in exceptional cases these tools can be used for personal use, provided all preconditions as set forth in the Roche Directive on the Use of Roche electronic communication tools are met.

**Q** I want to blog about my best friend’s great response to the Roche product X. Am I allowed to do that?

**A** While the company supports and respects the right of employees to use personal communication channels such as blogs, communications about our products are highly regulated. You will need to refrain from blogging about your friend’s great response to the Roche product X, because this could be deemed as unlawful promotion to the public of a prescription-only medication.

**Q** I notice that somebody is tweeting on pharmaceuticals in the environment and I strongly disagree with the statement made. Am I allowed to refer to Roche’s Position Paper on Pharmaceuticals in the environment?

**A** Yes, you are allowed to do so. The objective of a Roche Position Paper is to provide a company view on specific sustainability topics that are material to the business and important to our stakeholders. Merely making reference to Roche is permitted and is not considered as speaking on behalf of Roche. You are strongly encouraged to read and make reference to the Roche Position Papers. Those can be found on the Roche internet website [www.roche.com](http://www.roche.com).



# Records Management

## Records Management deserves our due attention

Records Management is understood as the creation, retention and discarding of records.

Many business records, irrespective of their media (paper, electronic, audio/video, microfilm etc.), that Roche employees create or receive in the course of their business are valuable assets for Roche. Therefore, efficient and correct Records Management is crucial for the protection of Roche's interests.

Roche's corporate records management program ("COREMAP") defines standards to improve the management of records across the global Roche organisation.

Roche distinguishes between convenience records and official records. Official records are listed in the Roche Group records classification. They need to be managed in compliance with internal and external standards and regulations, and be kept for a specified period of time. Convenience records are only of temporary value and will need to be regularly disposed to avoid risks and costs.

Roche employees are required to adhere to the following standards of care whenever they create a record:

- think before writing and decide whether it is necessary to create a record (e.g. an e-mail) at all;
- make sure that the record is in compliance with applicable laws;
- be factual, do not make assumptions and avoid misleading and suggestive wording;
- never create a document for which we would not be prepared to take responsibility;
- be mindful of the recipients of a record – do not share a record with recipients, especially externally, if there is no need for them to have access to it.

Records that reach the end of their life cycle must be discarded in line with the Roche Records Management Directive, local records management policies and retention schedules.

Records that relate to any actual or imminent legal proceeding or regulatory investigation are subject to compulsory retention and disclosure pursuant to applicable laws (so-called "legal hold" or "law hold"); Roche employees are not allowed to destroy these records and must retain them until such hold is lifted.

## We are all expected to:

- Manage our records with due attention.
- Never destroy any records that relate to any actual or imminent legal proceeding or regulatory investigation.

**Q** What is understood by "Records Management"?

**A** Records Management is understood as the creation, retention and discarding of records.

**Q** Why is it important that I adhere to the Roche standards of care whenever I create a record in my business activities?

**A** Be aware that any record can be used as evidence in a legal procedure or regulatory investigation against Roche; e.g. misleading and suggestive statements may trigger an investigation against Roche as a company as well as against the employee involved.

**Q** I have inherited documents and e-mails from my predecessor which could have been destroyed as the legally specified retention period has expired. Now I have heard there is a legal case and I think that the documents could be used against Roche. Am I allowed to discard them?

**A** No. You must not destroy any records that relate to any actual or imminent legal proceeding or regulatory investigation. The discarding of these documents would be considered as obstruction of justice, which is subject to severe sanctions. Therefore, you must preserve the records that could be relevant. Contact your local Records Coordinator or the Legal Department for further advice.

**Further information and guidance:** Roche Global Records Management Directive; Roche Guidelines on Competition Law Investigation ("Dawn Raid"); Roche E-Mail Directive; Video "Your E-Mail Matters", eLearning program "Records Management and Electronic Communication Basics" (COREMAP). These materials can be found on the Roche intranet (website of COREMAP). **Help & advice:** In case of questions regarding records management, please contact your local Records Coordinator or the Legal Department. **Speak up:** If you believe in good faith that in connection with a business where Roche is involved someone has done, is doing, or may be about to do something that violates the provisions regarding records management, speak up by using the available speak up channels.





# Responsible Business

## Sustainability

### Creating sustainable value for our stakeholders through improving lives – now and in the future

Our success in a rapidly evolving and complex healthcare environment hinges on our ability to develop strategies where both industry and society benefit. This means: delivering medical solutions and ensuring broad access to them, providing a rewarding workplace, being a trustworthy partner and supporting the communities in which we operate.

For nearly 120 years, Roche has been committed to improving lives. The long-term thinking of our founders and the stable majority ownership has allowed us to stay true to this vision and shapes the way we make a difference to the lives of millions of patients around the world.

For this reason, sustainability is integrated and integral into the way we do our business. It is in our Purpose Statement, anchored in our Corporate Principles and forms the foundation of our business model. We address our economic, social and environmental challenges holistically to create long-term value. If we are successful in delivering innovation to patients, then we create value for all other stakeholders too.

Our commitment to long-term thinking is further emphasised through our “Five-Year Corporate Goals” which serve as a bonus-relevant yardstick and against which progress is monitored annually. We focus our reporting around topics of high interest to our stakeholders and high impact on our business, as assessed by an integrated materiality process and approved by senior management. To further enhance our non-financial reporting excellence, we are fully committed to the standards set forth by the Global Reporting Initiative (GRI).

With an increasingly evolving and complex healthcare environment, we are committed to scientific rigour, unassailable ethics and access to medical innovations for all – to build a better tomorrow.

Ultimately, lasting innovation will be our greatest gift to society.

### We are all expected to:

- Live Roche's commitment to sustainability in our daily business.
- Benchmark our achievements against the industry and best practice.

**Further information and guidance:** Roche Corporate Principles; Roche Brochure “Doing now what patients need next”; Roche internet. **Help & advice:** In case of questions regarding sustainability, please contact your Line Manager, the local Compliance Officer, the Chief Compliance Officer, the Corporate Sustainability Committee or the Roche Group Code of Conduct Help & Advice Line. **Speak up:** If you believe in good faith that in connection with a business where Roche is involved someone has done, is doing, or may be about to do something that violates the provisions regarding sustainability, speak up by using the available speak up channels.

**Q** What does “Sustainability” mean for Roche?

**A** At Roche, sustainability is defined as creating value for our stakeholders through improving lives – now and in the future. We use our business to build a better tomorrow by creating innovative products and services and ensuring broad access to them, providing a rewarding workplace, being a trustworthy partner and supporting the communities in which we operate.

**Q** How does Roche create sustainable value?

**A** At Roche we create value for the company, society and the planet through: delivering medical innovations which improve people's lives; improving access to our innovation by developing local sustainable healthcare solutions; living our strong values shaped by our rich history and family tradition; working in a fair, ethical and transparent way to build mutual trust with our partners; supporting the communities and protecting the environment in which we live.

**Q** How is “Sustainability” managed at Roche?

**A** No single department is responsible for managing sustainability. Instead, all employees are encouraged to embed sustainability into their work. To support this, the Roche Corporate Sustainability Committee (CSC) is responsible for developing the Group's sustainability strategy and guidelines, and reports on related activities and progress. It is also responsible for assessing and prioritising material social, environmental and ethical topics.



# Stakeholder Engagement

Engaging with our stakeholders is essential to build trust, develop an understanding of our business challenges and jointly develop solutions

Open and constructive dialogue with our stakeholders is crucial to improving our ability to create sustainable value and growth. It helps us to better understand how to serve patients, their caretakers and physicians, and to focus our activities to create value for both the company and society.

The interests of our stakeholders are as diverse as the groups themselves – patients and patient organisations, healthcare professionals, payors, regulatory authorities and other government organisations, non-profit organisations, the scientific community, suppliers, service providers, investors, trade and business associations, media, our employees and society in general. We use a variety of channels to support our communications, such as corporate websites, annual reports and other publications. In addition, we participate in more formal and structured engagement, such as meetings, forums and other events, and carry out consultations and surveys.

We have established Group-wide guidelines and policies to govern our interactions with stakeholder groups. Transparency about relations between healthcare companies and a variety of stakeholders has become a topic of increasing interest, as has the amount of information available to those who are interested. Hence, we have taken numerous steps to improve our communication and transparency around key topics. In addition, we have developed a number of position papers on sustainability topics; each addresses specific expectations and concerns of our stakeholders.

Media contacts are managed by experts in the Media Relations team, whilst interactions with investors are dealt by the Investor Relations team. Roche employees must direct all media and investor inquiries to these teams.

## We are all expected to:

- Follow the Group-wide guidelines and policies that govern our interactions with stakeholder groups.
- Direct all media inquiries to the Media Relations team.
- Direct any inquiries by investors or financial analysts to the Investor Relations team.

**Q** I am discussing Roche's business activities with my neighbour. He asks me about Roche's position on topics such as: pricing of our medicines, animal research, human stem cells, and pharmaceuticals in the environment. Where can I find information that enables me to answer these questions?

**A** Roche has developed position papers on different sustainability topics of interest to our stakeholders. You can find them either on the Roche internet or on the Roche intranet (website of Group Communications and Group Legal Department).

**Q** I am working in the Research Department. A journalist asks for an interview about a new molecule my team is working on. Am I allowed to provide the requested answers?

**A** No, you cannot agree to be interviewed. Media contacts are managed by experts in the Media Relations team. Therefore you must forward the inquiry directly to them.

**Further information and guidance:** The Roche Position Papers can be found on the Roche internet and intranet. The guidelines and policies can be found on the Roche Intranet (website of Group Communications and Group Legal Department). **Help & advice:** In case of questions regarding stakeholder engagement, please contact the local or global Communication Departments. **Speak up:** If you believe in good faith that in connection with a business where Roche is involved someone has done, is doing, or may be about to do something that violates the provisions regarding stakeholder engagement, speak up by using the available speak up channels.



# Government Officials

## We consider and respect Government Officials as important stakeholders

Government officials play an important role in society, e.g. by establishing and maintaining the necessary conditions and institutions for economic stability, social cohesion and environmental protection as well as for providing access to healthcare for their citizens.

Roche is convinced that a proactive, honest, transparent and responsible dialogue and engagement between government officials and the private sector is a fundamental aspect of good public governance. All employees working with government officials are expected to follow our Good Practice Guidelines on Working with Government Officials, understand the specific additional limitations that may apply and act in an appropriate ethical and professional manner.

Any support of a political party, especially financial contributions, must be in compliance with applicable laws and regulations.

**Q** My friend is involved in a political campaign and asks me whether Roche can support this campaign. Is this okay?

**A** Any support of a political party, especially financial contributions, must be in compliance with applicable laws and regulations.

**Q** A former Roche colleague is running as a candidate for a local government position and I am asked to support his campaign with a personal financial contribution. Is this okay?

**A** Roche respects the right of its employees to support political or charitable activities personally as long as this support is not associated with Roche. Therefore, you are free to support your former colleague's campaign personally.

## We are all expected to:

- Interact with government officials in a proactive, honest, transparent and responsible way.
- Apply the Roche standards of business integrity in all our interactions with government officials.

**Further information and guidance:** The Roche Good Practice Guidelines on Working with Government Officials can be found on the Roche internet and the Roche intranet (website of Government Affairs Department and Group Legal Department). **Help & advice:** In case of questions regarding interactions with government officials, please contact your Line Manager, the local Compliance Officer, the Chief Compliance Officer or the Roche Group Code of Conduct Help & Advice Line. **Speak up:** If you believe in good faith that in connection with a business where Roche is involved someone has done, is doing, or may be about to do something that violates the provisions regarding interactions with government officials, speak up by using the available speak up channels.

# Patient Groups

## Integrity and transparency determine our interactions with Patient Groups

Roche is convinced that an open dialogue and transparent exchange of information with patient groups is vital.

Building and sustaining relationships with patient groups is an efficient way to get valuable insights that influence Roche's work across therapeutic areas – from drug development to regulatory approval and reimbursement into product launch and marketing. We are increasingly partnering with patient groups on projects ranging from disease awareness campaigns to clinical trial design.

Roche works with a wide range of patient groups in a variety of different areas, e.g. oncology, viral diseases, metabolic diseases and central nervous system diseases.

Patient groups provide patients with support and information on how to live with their disease, represent patient views and campaign for change on issues that affect patients' lives.

Different stakeholders, e.g. governments, trade associations (such as EFPIA and AdvaMed), the public and the media, call for integrity and transparency in terms of how industry interacts with patient groups and request the disclosure of financial and in-kind support provided by industry. Annually, Roche publishes the names of all patient groups it works with globally, and the support provided to them, on various channels.

Roche consistently applies high standards of conduct in its interactions with patient groups. All relationships with patient groups are based on the common values of integrity, independence, respect, equity, transparency and mutual benefit. These standards are set forth in the "Roche Good Practice Guidelines on Working with Patient Groups".

### We are all expected to:

- Respect patient groups as an important stakeholder.
- Base relationships and interactions with patient groups on the standards of integrity, independence, respect, equity, transparency and mutual benefit.
- Sustain our relationships with patient groups.

**Further information and guidance:** Industry codes (e.g. EFPIA Patient Organisation Code of Practice); Roche Position Paper on Working with Patient Groups; Roche Good Practice Guidelines on Working with Patient Groups. These documents can be found on the Roche intranet (website of Group Legal Department) and partially on the Roche internet. **Help & advice:** In case of questions regarding interactions with patient groups, please contact your Line Manager, the local Compliance Officer, the Chief Compliance Officer or the Roche Group Code of Conduct Help & Advice Line. **Speak up:** If you believe in good faith that in connection with a business where Roche is involved someone has done, is doing, or may be about to do something that violates the provisions regarding interactions with patient groups, speak up by using the available speak up channels.

**Q** Are open dialogue and the transparent exchange of information with patient groups adding value to Roche's business?

**A** Yes. Patient groups offer Roche valuable insights that influence our work across therapeutic areas – from drug development to regulatory approval and reimbursement into product launch and marketing.

**Q** I am working in the Sales Department. In order to increase the sales I intend to give a substantial financial contribution to a patient group as a return for the patient group's public support of the Roche product I am responsible for. Is this behaviour correct?

**A** No. You must respect the independence of the patient group and are not allowed to abuse the patient group as a marketing tool. Keep in mind that advertising of a prescription-only medicine to the public is prohibited in most countries (except in the USA and New Zealand, which currently allow direct-to-consumer advertising).

# Business Partners

## We expect high standards of performance and integrity from our Business Partners

Roche is committed to high standards of performance and sustainability in all its activities, including in its dealings with business partners.

Our business partners play an important role as enablers of our sustainable growth and overall success.

All dealings by Roche with its business partners are executed on the basis of high quality of the requested product(s) and service(s), availability, competitive prices, best suitability, sustainability and integrity. Roche has set forth principles regarding appropriate remuneration of its business partners, such as consultants, advisers, agents or specialists.

Roche expects that the behaviour of its business partners complies with applicable laws, regulations, industry codes and contractual terms, as well as with generally accepted sustainability standards, such as protection of human rights, safety and environment, prohibition of child or forced labour, money laundering and bribes. Roche supports the industry principles for responsible supply chain management.

Before entering into a business engagement, Roche performs a due diligence of the potential business partners to get first-hand assurance about their integrity, quality, suitability and credibility.

After signing of the contract and adequate instruction concerning integrity and other duties, the due diligence of business partners takes on the form of monitoring to ensure compliance with the rules set out in the contract ("Trust, but verify").

Business partners can seek help and advice in respect of the implementation of the Roche Group Code of Conduct as well as report a potential non-compliant situation which they face in connection with a Roche business directly to the Roche Chief Compliance Officer.

If a business partner does not comply with applicable laws, regulations, industry codes, contractual terms or with generally accepted sustainability standards, Roche requests appropriate remedial measures and will, if necessary, terminate the cooperation.

## We are all expected to:

- Interact with our business partners with integrity.
- Obtain and maintain assurance about the integrity, quality, suitability and credibility of our business partners before and during a business engagement.
- Request appropriate remedial measures if we become aware of a compliance issue with a business partner.

**Further information and guidance:** Roche Position Paper on Respecting Human Rights; Roche Supplier Code of Conduct; Roche Directive Behaviour in Business – Directive on Integrity in Business; Roche Anti-Corruption Compliance Questionnaire for Roche Business Partners (self-assessment tool); Roche Anti-Corruption Compliance Assurance Confirmation of Roche's Business Partners; eLearning program "Behaviour in Business - Addendum I" (RoBiB Add I). These materials can be found on the Roche internet and intranet (website of Group Legal Department). Information for the business partners can be found on the Roche internet. **Help & advice:** In case of questions regarding interactions with business partners, please contact your Line Manager, the local Compliance Officer, the Chief Compliance Officer or the Roche Group Code of Conduct Help & Advice Line. **Speak up:** If you believe in good faith that in connection with a business where Roche is involved someone has done, is doing, or may be about to do something that violates the provisions regarding interactions with business partners, speak up by using the available speak up channels.

**Q** I work with a consultant. He has asked me for high remuneration for his services which in my opinion is clearly above a fair market price. What shall I do?

**A** Roche has set forth the principles regarding the remuneration of its business partners in the Roche Directive on Integrity in Business. Accordingly, the remuneration should be in line with the fair market value of the services provided. If the remuneration is not commensurate with the services provided, you should not accept the consultant's request. Immediately inform your Line Manager and the local Compliance Officer to discuss an appropriate solution.

**Q** I heard informally that one of our suppliers is under investigation for using child labour. Should I ignore this rumour?

**A** No. Roche protects human rights and does not tolerate behaviour by its business partners which is not in line with applicable laws and generally accepted sustainability standards. You should immediately speak up and bring this information to the attention of your Line Manager. Roche will investigate the matter and take further appropriate steps. Roche's position on human rights is articulated in the Roche Corporate Principles, the Roche Position Paper on Respecting Human Rights and in the Supplier Code of Conduct. These documents can be found on the Roche internet website [www.roche.com](http://www.roche.com).

# Philanthropic Initiatives

We engage in philanthropic giving as part of our sustainability efforts

Roche has a rich history not only in healthcare innovation, but also in philanthropic giving.

Roche's approach to philanthropic donations and non-commercial sponsorships mirrors our sustainable business model and innovation culture.

When assessing projects, we focus on the potential impact rather than on cost. Impact is the measure of value and success.

Philanthropic donations are decided by local management of the affiliate concerned. However, donations involving more than one country are handled by Roche's Corporate Donations and Philanthropy group.

Decisions are made in line with the Roche Policy on Philanthropic Donations and non-commercial Sponsorship.

Roche employees support philanthropic initiatives, e.g. the annual Roche Children's Walk, which brings together employees in all time zones to raise money to support vulnerable children across the globe.

As part of its commitment to society, Roche supports its employees who personally engage in community activities, such as the Roche Secondment program that enables Roche employees to support non-governmental organisations with their knowledge on healthcare-related topics.

**Q** Why is it a good thing for me to participate in the Roche Children's Walk?

**A** By participating in the Roche Children's Walk you help to raise money for children who need it urgently. The money that you collect will be doubled by Roche and invested to 100% in supported projects.

**Q** I receive a request from a sports club asking Roche for a financial donation. What do I do?

**A** Philanthropic donations are decided by local management of the affiliate concerned. Global projects are handled by the Corporate Donations and Philanthropy group. The decision-maker has to assess whether a specific request is in line with the principles as set forth in the Roche Policy on Philanthropic Donations and non-commercial Sponsorship.

## We are all expected to:

- Address any request for philanthropic sponsorship and non-commercial donation to the responsible Roche decision-maker.

**Further information and guidance:** Roche Policy on Philanthropic Donations and non-commercial Sponsorship; Roche Brochure "Improving access: overcoming barriers"; Roche Secondment program Factsheet; Roche Children's Walk Factsheet. These documents can be found on the Roche internet and intranet (website Group Legal Department). Roche also supports a number of health-related areas such as disease awareness campaigns and capacity building initiatives, which are connected with developing our business. Details of these initiatives can also be found on the Roche internet.

**Speak up:** If you believe in good faith that in connection with a business where Roche is involved someone has done, is doing, or may be about to do something that violates the provisions regarding philanthropic initiatives, speak up by using the available speak up channels.







# Comprehensive Compliance Management

## Compliance Responsibilities

### Compliance at Roche – our contributions make it happen

We do business in a highly regulated industry; compliance with legal and regulatory requirements is a prerequisite for our licence to operate.

Compliance means our behaviour is in adherence with applicable laws, regulations, industry codes and Roche's integrity standards.

Roche has established a comprehensive Compliance Management System (CMS), which we are committed to implementing and enforcing. The CMS focuses on prevention, detection and responding to non-compliance behaviour by comprehensively involving people, principles, policies and processes.

Roche believes that the sense of responsibility of each and every employee is the basis of compliance. Thus we must constantly and adequately identify, assess and manage the compliance risks that fall within the sphere of our business responsibilities. Performance is not only measured by the results achieved, but also how these results were achieved.

We at Roche understand compliance as a key Line Management responsibility. As a matter of fact, in many cases non-compliance is the consequence of bad and/or no leadership. Hence, as part of our leadership task, Roche Line Managers are obliged to carefully select, instruct and monitor the employees for whom they are responsible. They are expected to involve compliance aspects in the performance assessment of their employees. Roche is committed to providing adequate training for Line Managers which enables them to meet their responsibility.

Compliance functions are responsible for supporting employees and Line Management in many ways in the comprehensive compliance management.

### We are all expected to:

- Make sure that our business behaviour complies with applicable laws, regulations, industry codes and Roche's integrity standards.
- Be aware of our responsibility in the comprehensive compliance management.
- Continuously and adequately identify, assess and manage compliance risks that fall within the sphere of our business responsibilities.

**Further information and guidance:** The eLearning programs "Behaviour in Business" (RoBiB) and "Behaviour in Business – Addendum I" (RoBiB Add I) can be found on the Roche intranet (website of Group Legal Department). **Help & advice:** If you want to know more about Roche's compliance responsibilities, please contact your local Compliance Officer, the Chief Compliance Officer or the Roche Group Code of Conduct Help & Advice Line. **Speak up:** If you believe in good faith that in connection with a business where Roche is involved someone has done, is doing, or may be about to do something that violates the Roche Group Code of Conduct, speak up by using the available speak up channels.

**Q** I am considering granting an advantage to a business partner in order to achieve my business target. Is a business target a valid justification for the granting of an advantage?

**A** No. At Roche performance is not only measured by results achieved, but also how these results were achieved. Stretched business targets are never an excuse or justification for violating our integrity standards. Always remember, you are responsible and will be held accountable for your behaviour.

**Q** I am a Roche Line Manager. What is my role in the comprehensive compliance management?

**A** Compliance is a key Line Management responsibility. As part of your leadership function you are obliged to carefully select, instruct and monitor the employees for whom you are responsible.

**Q** What is meant by "carefully monitor the employees for whom I am responsible as a Line Manager"?

**A** For example, if you become aware that one of your employees is not wearing the protective glasses as requested by Roche's safety and health provisions, you have to make sure your employee is properly informed and instructed and complies with these provisions.



# Compliance Officers

## Compliance Officers support us

The Chief Compliance Officer (CCO) with the Compliance Officers network is committed to ensuring that the Roche Group Code of Conduct is consistently complied with throughout the Roche Group. The Chief Compliance Officer also serves as a contact for employees, shareholders, business partners, customers and the general public on issues relating to the implementation of and compliance with the Roche Group Code of Conduct.

A local Compliance Officer has been appointed in each Roche affiliate with the following responsibilities, in particular, but not limited to:

- ensuring that employees know where they can ask for help and advice if they have doubts about the correct business behaviour;
- networking and collaborating with local, regional and global compliance experts in order to identify and take advantages of synergies between Pharmaceuticals and Diagnostics;
- coordinating local compliance endeavours, initiatives and training programs;
- supporting and conducting compliance monitoring, compliance controls and compliance audits;
- supporting Line Management in the local integrity risk-management processes;
- supporting Line Management in the adequate handling of local non-compliance cases, including reporting in the Business Ethics Incident Reporting (BEIR) system;
- encouraging employees to speak up if they have a compliance concern.

The Chief Compliance Officer coordinates the network of the local Compliance Officers and makes sure that best practice examples are regularly exchanged and shared within the network and that global Compliance tools are continuously reviewed and updated.

## We are all expected to:

- If we don't feel comfortable contacting our Line Manager, contact the local Compliance Officer to seek help and advice or to report a compliance concern.
- Contact the Chief Compliance Officer, if we prefer not to contact the local management or the local Compliance Officer.

**Q** A stakeholder wants to make a complaint against Roche alleging that somebody within Roche has violated the Roche Group Code of Conduct. To whom can the stakeholder address the complaint?

**A** The Chief Compliance Officer serves as a contact person for employees, shareholders, business partners, customers and the general public on issues relating to the implementation of and compliance with the Roche Group Code of Conduct.

**Q** I work as a sales manager in a Roche affiliate and – keeping in mind Roche's business integrity standards – I do not feel comfortable with an instruction that I received from my Line Manager. What should I do?

**A** Speak up and address your concerns directly to your Line Manager. If you are not satisfied with the answer that you received from your Line Manager, contact your local Compliance Officer who will take and treat your compliance concerns seriously and in a confidential way.

**Q** I face a sensitive compliance issue that I would like to discuss neither with the local management nor with the local Compliance Officer. With whom can I discuss this issue?

**A** You can contact the Chief Compliance Officer who will treat your matter in a confidential way.

**Further information and guidance:** eLearning program "Behaviour in Business" (RoBiB); eLearning program "Behaviour in Business – Addendum I" (RoBiB Add I); Document Functions and Responsibilities of local Compliance Officers. These materials can be found on the Roche intranet (website of Group Legal Department). **Help & advice:** If you want to know more about the functions of Roche's Compliance Officers, contact your local Compliance Officer, the Chief Compliance Officer or the Roche Group Code of Conduct Help & Advice Line. **Speak up:** If you believe in good faith that in connection with a business where Roche is involved someone has done, is doing, or may be about to do something that violates the Roche Group Code of Conduct, speak up by using the available speak up channels.



# Addressing Non-compliance

Adequate handling of non-compliance cases is a key part of our comprehensive compliance management

Roche does not tolerate non-compliant behaviour. Employees and Line Managers who violate the Roche Group Code of Conduct will be held accountable.

Roche is fully committed to handling non-compliance cases adequately by:

- taking all allegations seriously;
- investigating allegations efficiently and in a timely manner;
- assessing the facts objectively and impartially; and
- taking adequate corrective measures and sanctions, in case an allegation is substantiated.

Any accused employee enjoys the presumption of having acted in accordance with the Roche Group Code of Conduct, unless the evidence gathered from the investigation reasonably indicates non-compliance. We fully collaborate with the investigators and make sure that we have compliance evidence at hand, which demonstrates that our behaviour was compliant.

Certain allegations, in particular but not limited to corporate bribe and fraud, will be investigated by internal or external experts under the leadership of the Roche Group Audit and Risk Advisory Department.

Line Management with the support of Human Resources and local Compliance Officers is responsible for determining adequate corrective measures and sanctions.

Non-compliance cases have to be reported under the responsibility of specified Line Managers in the Business Ethics Incident Reporting (BEIR) system as soon as they become aware of them.

The BEIR system enables Top Management, the Chief Compliance Officer and the Chief Group Audit and Risk Advisory Executive to capture, track and monitor alleged violations, from initial reports through to resolution.

The number and related characteristics of non-compliance cases which occurred during a reporting year will be published in the annual report of Roche Holding Ltd.

## We are all expected to:

- Make every effort to prevent non-compliance cases.
- Fully collaborate with the investigator and ensure we have compliance evidence at hand.
- Take adequate corrective measures and sanctions if we have to handle non-compliance cases as a Line Manager.

**Further information and guidance:** The Roche Directive on adequate handling of non-compliance cases and the Roche Directive on Business Ethics Incident Reporting can be found on the Roche intranet (website of Group Legal Department). **Help & advice:** In case of questions on addressing non-compliance or the business ethic incident reporting, contact your Line Manager, the local Compliance Officer, the Chief Compliance Officer or the Roche Group Code of Conduct Help & Advice Line. **Speak up:** If you believe in good faith that in connection with a business where Roche is involved someone has done, is doing, or may be about to do something that violates the Roche Group Code of Conduct, speak up by using the available speak up channels.

**Q** Does Roche tolerate violations of its Group Code of Conduct?

**A** No. Violations of the Roche Group Code of Conduct are not tolerated and responsible employees will be held accountable. Under the responsibility of Line Management adequate corrective measures and sanctions must be taken.

**Q** What is meant by "compliance evidence"?

**A** Compliance evidence is any form of proof demonstrating that your behaviour was correct, e.g. written evidence of the consent of your Line Manager in a possible conflict of interest situation.

**Q** What shall I do if my Line Manager insists that I undertake something which I consider not in line with the Roche Group Code of Conduct? Is it sufficient compliance evidence if I make a note stating that the Line Manager has insisted on my acting accordingly?

**A** No. If your Line Manager is insisting on incorrect behaviour you should speak up by using the available speak up channels.



# Contacts

## Addresses & Links

### **Chief Compliance Officer**

Dr. Urs Jaisli, Group Legal Department, Compliance.

Email: [urs.jaisli@roche.com](mailto:urs.jaisli@roche.com)

Phone: +41 61 688 40 18

The most recent contact details can be found on the Roche intranet (website of the Group Legal Department under the heading "Compliance & Sustainability") as well as on the Roche internet.

### **Local Compliance Officers**

The most recent names and contact details of the local Compliance Officers can be found on the Roche intranet (website of the Group Legal Department under the heading "Compliance & Sustainability").

### **Roche Group Code of Conduct Help & Advice Line**

Requests can be submitted to [global.helpandadvice@roche.com](mailto:global.helpandadvice@roche.com). Further information can be found on the Roche intranet under [helpandadvice.roche.com](http://helpandadvice.roche.com) (website of the Group Legal Department).

### **Roche Group SpeakUp Line**

Access to the free phone line and the URL for the Roche Group SpeakUp Line web service can be found on the Roche intranet under [speakup.roche.com](http://speakup.roche.com) (website of the Group Legal Department).

### **Roche Group Code of Conduct**

The Roche Group Code of Conduct as well as a list of all references can be found on the Roche intranet (website of the Group Legal Department under the heading "Compliance & Sustainability", subheading "Roche Group Code of Conduct") as well as on the Roche internet.

Hard copies of the Roche Group Code of Conduct are available upon request to the Compliance Administrators in Basel [global.compliance\\_administration@roche.com](mailto:global.compliance_administration@roche.com).

The Roche Group Code of Conduct is also available as a mobile device application for Roche-managed devices (download available under: [codeofconduct.roche.com](http://codeofconduct.roche.com)).

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