



# Rules of procedure

## for the investigation of reports of violations of human rights and environmental concerns in the supply chain and the Roche Group Codes of Conduct (dated 27.12.2022; version 05.0 dated 30.04.2025)

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

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

The above companies are hereinafter to as "Roche".



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Sustainability at Roche

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



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

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

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

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

# 1Background

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

**Code of conduct for  
suppliers**

[Roche Supplier Code of Conduct](#)

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**Code of conduct for  
employees**

[Roche Group Code of Conduct](#)

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## 2 Notification

**What does the procedure cover?**

These Rules of Procedure cover the following types of complaints, irrespective of how they are reported to Roche:

- Information relating to human rights and/or environmental risks or violations along Roche's entire supply chain in accordance with the Supply Chain Due Diligence Act.
- All other violations of the Roche Supplier Code of Conduct or the Roche Group Code of Conduct.

**Reporting channels**

Persons who intend to report information about a violation may choose whether to report to a Roche internal reporting office or an external reporting office. Such persons should prefer to report to an internal reporting office in cases where the violation can be effectively addressed internally and they do not fear retaliation.

The function of the [external reporting office](#) in Germany is assumed by the Federal Office of Justice.

If an internally reported violation has not been remedied, the whistleblower is at liberty to an external reporting office.

The following internal reporting channels are available to Roche
Manager
Compliance Officer  <a href="mailto:meldestelle.deutschland@roche.com">meldestelle.deutschland@roche.com</a>
Chief Compliance Officer  +41 61 688 48 90
Human Rights Manager :  <a href="mailto:deutschland.menschenrechtsbeauftragte@roche.com">deutschland.menschenrechtsbeauftragte@roche.com</a>
Works Council
Personnel management
 <a href="#">Speak Up Line - anonymous possible</a>

2 Notification

The following registration offices are publicly available



[Speak Up Line - anonymous possible](#)

Human Rights 

[deutschland.menschenrechtsbeauftragte@roche.com](mailto:deutschland.menschenrechtsbeauftragte@roche.com)

Compliance Officer;



[meldestelle.deutschland@roche.com](mailto:meldestelle.deutschland@roche.com)

Chief Compliance Officer

 +41 61 688 48 90

The following external reporting offices (of the federal government) are available

Federal Office of Justice

## 2 Notification

### Responsible authorities

The responsibility includes the coordination, implementation and documentation of the procedure as well as participation in preventive and corrective measures.

Responsibility for infringements

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

### Procedural principles

The persons involved in the procedure are independent in the performance of their duties, are not bound by instructions and have the necessary expertise.

Reporting offices must maintain the confidentiality of the identity of the following persons:

- person making the reference
- Persons who are the subject of a notification
- other persons named in the notification

### Restriction of confidentiality requirement

The confidentiality requirement is not observed in the following cases:

- Person who intentionally or through gross negligence reports incorrect information about violations
- in criminal proceedings at the request of the criminal prosecution authorities
- due to a court decision

The Reporting Office must inform the reporting person in advance of the disclosure. This must not be done if the prosecuting authority, the competent authority or the court has informed MROS that the information would jeopardize the relevant investigations, inquiries or court proceedings.

### 3 Documentation and data protection

**Protection of the whistleblower**

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Roche does not tolerate any reprisals, neither against whistleblowers nor against other persons potentially involved in the proceedings who express reasonable suspicion that the Supplier Code of Conduct has been violated.

Roche Group, the Roche Group Code of Conduct or the legal positions protected by the Supply Chain Duty of Care Act.

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**Reporting tool**

The case is documented in a case processing system controlled by Roche's internal system.

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**Data protection**

The following must be observed for all recordings

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



4 Deadlines

Confirmation of receipt	The responsible reporting office, see point 2, confirms receipt of the report to the whistleblower no later than seven days after receipt of the report and documents receipt.
File system	The files must created within seven days.
Status updates	The files must updated at least every three months in accordance with the knowledge gained up to that point.
Feedback to the person providing the information	<div>The internal reporting office, see point 2<ul style="list-style-type: none"><li>maintains contact with the person providing the information;</li><li>discusses the facts of the case with the latter; and</li><li>will provide information on the status of the investigation within three months of confirming receipt of the report.</li></ul></div>



5 Course of the procedure

Sighting

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

Examination of the complaint or tip-off

If the notice falls within the scope of these Rules of Procedure:

yes	continue with classification
no	Information to the whistleblower

Clarification of the facts

The facts of the case will be investigated and reviewed by the responsible reporting office, see point 2. If necessary, the case will be forwarded to another responsible office within the Roche Group.

## 5 Evaluation of the notification

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**Type of valuation**

Following the investigation of the facts, the facts are assessed. All persons entrusted with conducting the proceedings are impartial, independent and not bound by instructions.

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**Disciplinary measures**

In addition, disciplinary measures may be imposed for non-compliant behavior. These include, among others:

- Verbal or written warning
  - Reduction or abolition of the bonus
  - Reduction or cancellation of share awards
  - downgrading of a position or
  - Termination of the employment relationship
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**Remedial measures  
vis-à-vis suppliers**

Termination of the business relationship if

- the violation of a protected legal position or an environmental obligation is considered to be very serious,
  - the implementation of the measures developed in the concept does not remedy the situation after the time specified in the concept has elapsed, and
  - Roche has no other milder means at its disposal or
  - the violation of a protected legal position or an environmental obligation is deemed to be so serious that remedial measures are not promising and Roche no milder means at its disposal.
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## 6 Closing

### Reporting

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

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## 7 Effectiveness of the complaints procedure

### Report

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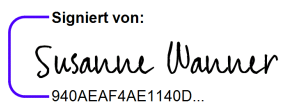
The Reporting Office responsible for the procedure, see point 2, draws up an annual report containing at least the following points:

- Messages received
- Implementation of the remedial measures

The Human Rights Commissioner's report also contains the following points:

- Effectiveness of the remedies
  - Preventive measures and
  - Effectiveness of the preventive measures
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Mannheim, April 30, 2025

Signiert von:  
  
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**Susanne Wanner**

Human Rights Officer of the German Roche Companies

### Publisher

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