

Rules of Procedure

for the investigation of reports of violations against human rights and environmental concerns within the supply chain and the Codes of Conduct of the Roche Group

(dated 27.12.2022; Version 06.0 dated 08.05.2026)

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

- Roche Deutschland Holding GmbH
- Roche Diagnostics GmbH
- Roche Diagnostics Deutschland GmbH
- Roche Diabetes Care GmbH
- Roche Real Estate Services Mannheim GmbH
- Roche Diagnostics Automation Solutions GmbH
- TIB Molbiol Syntheselabor GmbH
- Roche Pharma AG
- RoX Health GmbH

The aforementioned companies are hereinafter referred as „Roche“.



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1 Background

Sustainability at Roche

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



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

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

Society:	how we contribute to a better future for all
Environmental:	how we minimize the impact of our activities on nature
Economic:	how we invest in medical progress, create jobs and secure livelihood

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 enshrined in the values and guidelines, e.g., in the Codes of Conduct for employees and suppliers.

1 Background

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

Supplier Code of Conduct [Roche Supplier Code of Conduct](#)

Code of Conduct for employees [Roche Group Code of Conduct](#)

2 Complaint Notification

What does the procedure cover?

This Rules of Procedure encompasses the following types of complaints, regardless of the reporting channel through which they reach Roche:

- Reports concerning human rights and/or environmental risks or violations along the entire Roche supply chain pursuant to the Supply Chain Due Diligence Act (*Lieferkettensorgfaltspflichtengesetz*)
- Reports that fall under the Whistleblower Protection Act (*Hinweisgeberschutzgesetz, HinSchG*)
- All other reports of violations against the Roche Supplier Code of Conduct or the Roche Group Code of Conduct.

Reporting Channels

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

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

If an internally reported violation has not been remedied, the reporting person remains free to turn to an external reporting office.

the following reporting channels are available internally at Roche:
Manager
Human Rights Officer ✉ deutschland.menschenrechtsbeauftragte@roche.com
Compliance Officer ✉ meldestelle.deutschland@roche.com
Chief Compliance Officer ☎ +41 61 688 48 90
Site Security
P&C Management
📣 Speak Up Channel - anonymous possible

2 Complaint Notification

the following reporting offices are publicly available

 [Speak Up Channel - anonymous possible](#)

Human Rights Officer

 deutschland.menschenrechtsbeauftragte@roche.com

Compliance Officer

 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 Complaint Notification

Responsible Bodies

The responsibility includes the coordination, execution, documentation of the procedure, and participation in preventive and remedial measures.

The responsibility for reports of violations

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

Principles of Procedure

The persons involved in the procedure are independent, not bound by instructions in the exercise of their function, and possess the necessary technical expertise. The reporting offices must maintain the confidentiality of the identity of the following persons:

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

Limitation of the Confidentiality Obligation

The confidentiality obligation is not maintained in the following cases:

- A person who reports incorrect information about violations intentionally or with gross negligence
- In criminal proceedings upon request by law enforcement authorities
- Due to a court decision

The reporting office must inform the reporting person in advance about the disclosure. This is to be refrained from if the law enforcement authority, the competent authority, or the court has informed the reporting office that providing the information would jeopardize the corresponding investigations, inquiries, or court proceedings.

3 Documentation and Data Protection

Protection of the Reporting Person

Roche does not tolerate any reprisals, neither against reporting persons nor against other persons potentially involved in the procedure who express a justified suspicion that the Roche Group Supplier Code of Conduct, the Roche Group Code of Conduct, or the protected legal positions of the Supply Chain Due Diligence Act (*Lieferkettensorgfaltspflichtengesetz*) have been violated.

Reporting Tool

The case is documented in a Roche internal system-controlled case processing system.

Data Protection

For all records, attention is paid to

- confidential handling of the documents
 - secure storage
 - fulfillment of the requirements for [Data Protection and Confidentiality](#)
 - fulfilment of the Roche requirements for the duration of data archiving
-

4 Deadlines

Acknowledgement of Receipt

The competent reporting office, see Point 2, confirms receipt of the report to the reporting person no later than seven days after receipt of the report and documents the receipt.

Feedback to the Reporting Person

The internal reporting office, see Point 2

- maintains contact with the reporting person;
 - requests further information from the reporting person if necessary
 - provides feedback within three months after confirming receipt of the report on planned and already taken follow-up measures
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5 Procedure Flow

Screening

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

Review of the Complaint or Notification

If the complaint or notification falls under the scope of this Rules of Procedure:

yes	Continue with Classification
no	Information to the reporting Person

Investigation of the Facts

The facts are investigated and examined by the competent reporting office, see Point 2. Where applicable, the case is forwarded to another competent body within the Roche Group.

5 Assessment of the Notification

Type of Assessment

Following the investigation of the facts, an assessment of the facts takes place. All persons entrusted with the implementation of the procedure are impartial, independent, and not bound by instructions.

Disciplinary Measures

Moreover, disciplinary measures can be imposed for non-compliant conduct. These include, among others:

- Oral or written warning
 - Reduction or abolition of the bonus
 - Reduction or cancellation of share allocations
 - Demotion to a lower position, or
 - Termination of employment
-

Remedial Measures towards Supplier

Termination of the business relationship, if

- the violation of a protected legal position or an environment-related duty is rated as very severe,
 - the implementation of the measures developed in the concept does not bring about remedy after the time set in the concept has elapsed, and
 - Roche has no other milder means available, or
 - the violation of a protected legal position or an environment-related duty is rated as so severe that remedial measures are not promising and Roche has no milder means available.
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6 Closing

Reporting

The responsible reporting office for the procedure, see Point 2, prepares a final report upon closing of the complaint procedure.




7 Effectiveness of the Complaint Procedure

Report

The responsible reporting office for the procedure, see Point 2, prepares an annual report that contains at least the following points:

- received Notifications
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Mannheim, 08. Mai 2026

Signiert von:

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Susanne Wanner

Human Rights Officer of the German Roche Companies

Publisher

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