



Modern Slavery Statement

Year ending 31 December 2025

Roche Products Pty Limited
Roche Diagnostics Australia Pty Limited

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Executive Summary

Our Commitment

At Roche, we believe that modern slavery is a fundamental affront to human dignity and a serious breach of basic rights. We are dedicated to playing our part in reducing these injustices across both our internal operations and our broader value chain.

We are committed to continuously improving human rights practices through our policies, processes, risk management and mitigation. We monitor, investigate and address any deviations from our human rights commitments and collaborate with business partners to prevent misconduct. We apply internal policies and a systematic risk management process for child labour and broader human rights violations across our operations and supply chain, evaluating risks like health and safety and adequate wages.

This commitment is embedded in our purpose: *Doing now what patients need next.*

About This Statement

This document serves as a joint report from Roche Products Pty Limited and Roche Diagnostics Australia Pty Limited (referred to together as Roche Australia). Both entities are recognised as reporting bodies under the Modern Slavery Act 2018 (Cth).

This statement details the milestones achieved during the 2025 calendar year and outlines our ongoing roadmap to safeguard our business and supply networks from the risks of modern slavery.

2025 Progress and Strategic Actions

During 2025, Roche Australia intensified its efforts to detect and address modern slavery risks by integrating robust policy enforcement with rigorous supplier due diligence and comprehensive risk assessments.

By fostering a speak-up culture and maintaining high levels of oversight - particularly within high-risk sectors and geographies - we have strengthened the safeguards protecting vulnerable populations throughout our value chain. Our approach remains rooted in collaboration and community resilience, ensuring that our domestic actions serve as a transparent and vital extension of Roche's global mission to eliminate exploitative practices.



Looking Ahead

Moving forward, Roche Australia remains dedicated to strengthening and refining our **anti-modern slavery strategy** by building upon our established frameworks. We are focussed on enhancing our monitoring systems, forging strategic industry alliances to drive **systemic change**, and maintaining a **transparent account of our evolution**.

As we look ahead, we will continue to critically evaluate our **internal policies, supplier protocols**, and **due diligence frameworks** to ensure they align with emerging legislative standards and global best practices. Beyond direct oversight, we are committed to identifying and closing potential gaps in our operations while expanding vital collaborative networks to elevate our standards and foster a more resilient value chain.

We have defined targets to address labour practices, workplace safety and more effective grievance mechanisms across our value chain. By 2029, our global target is to assess **95%** of high-risk business partners. We aim to achieve this by delivering supplier training and capacity building, collaborating and taking part in industry initiatives, and conducting audits and inspections for high-risk business partners.





Roche wishes to acknowledge all Traditional Custodians of the lands of this continent we today call Australia.

We respect the Original Peoples' deep connection and continuing care of the land, water and sky worlds.

Roche honours all First Nations Peoples; in particular, Elders both past and present.

Who are the reporting entities?

This Statement relates to the following reporting entities:

Roche Products Pty Limited

ABN 70 000 132 865

Level 8, 30-34 Hickson Road Sydney NSW 2000

Roche Diagnostics Australia Pty Limited

ABN 29 003 001 205

2 Julius Avenue, North Ryde NSW 2113



In preparation of this Statement, representatives from both named entities have been consulted.

What are Roche Australia's structures, operations, and supply chains?

F. Hoffmann-La Roche AG, widely recognised as Roche, is a Swiss multinational holding healthcare company that operates worldwide.

Roche is a leading global biotech company with over [125 years of history](#) and operations across more than 100 countries, employing 112,774 people worldwide. In 2025, Roche touched 258 million lives with our high-medical-value diagnostics solutions and treated more than 39 million patients with our medicines.

Roche Australia are the Australian affiliates of the Roche Group, and our operations are focused on importing, distributing, and marketing various healthcare products such as pharmaceuticals, diagnostic, and medical devices in Australia. For more than [six decades in Australia](#), Roche Australia has been a trusted provider of innovative healthcare solutions and in-vitro diagnostics.

[Roche Products Pty Limited](#) focuses on high-quality pharmaceuticals and healthcare solutions that enhance patient care and healthcare advancements.

[Roche Diagnostics Australia Pty Limited](#) delivers a broad spectrum of diagnostic tests and systems for precise and timely diagnosis and monitoring of health conditions.

As the Australian affiliates of the Roche Group, our local operations involve a mix of global sourcing and strategic domestic partnerships. We collaborate with both internal Group entities and selected third-party providers for essential functions including logistics, facilities management, marketing, and professional services.

The main inputs, operations and outputs of Roche's value chain are illustrated in the diagram below. For our **Pharmaceuticals Division**, inputs include chemical and biological materials, such as active pharmaceutical ingredients, excipients and packaging. For the **Diagnostics Division**, inputs include electronic components for instruments and chemical and biological materials for reagents.

Together with our business partners, we transform these inputs through research and development, manufacturing and commercialisation activities into medicines and diagnostic solutions for healthcare professionals, patients, and the Australian healthcare system.



[Source: Roche Annual Report 2025 \(page 81\)](#)

What are the risks of modern slavery in Roche Australia's supply chain?

Modern slavery presents a complex challenge that can manifest at any level of a globalised supply chain, particularly where international borders and diverse regulatory environments intersect. Global supply chains face challenges, including **compliance with labour laws and human rights standards, as well as maintenance of grievance mechanisms for affected workers.**

At Roche Australia, protecting against modern slavery is one of our main operational mandates. While we assess the direct risks within our own workforce as low, we remain vigilant regarding the complexities of global sourcing and the potential for exploitation within our broader network of third-party providers. We recognise that risks are often amplified by factors such as the employment of vulnerable or migrant labour, operations in regions with weak legal oversight, labour-intensive industries with opaque recruitment processes, and the inherent lack of visibility in multi-tiered supply chains.

2025:

Roche globally identified inadequate working conditions and health and safety practices in the value chain, as well as supplier adherence to wage regulations and fair remuneration principles as key risk areas.

To address these challenges, Roche Australia directs its due diligence toward sectors and activities identified as higher-risk. Our scrutiny extends to the **procurement of manufacturing inputs as well as promotional merchandise.**

We also place a high priority on **outsourced services**, specifically logistics, warehousing, and facilities management (such as cleaning and security), where third-party labour is common. Additionally, we monitor the **supply chains** of IT hardware and digital services, alongside our **clinical research operations**. In the latter, we pay close attention to the working conditions and participant rights associated with third-party **Contract Research Organisations**.

By focusing our due diligence on these specific areas, Roche Australia proactively manages potential vulnerabilities. Our goal is to mitigate risks effectively while fostering a supply chain defined by transparency and ethical integrity.



What have been the actions taken by Roche Australia to assess and address the risks?

Roche's commitment to international human rights standards

Roche's position on respecting human rights is informed by leading international standards. We look to the **UN Human Rights Council's "Protect, Respect, Remedy"** principles, as championed in the [Ruggie Framework](#), to help guide our internal processes and supply chain management.

As proud signatories of the [UN Global Compact Principles](#) and supporters of the [UN Sustainable Development Goals](#), we strive to integrate ethical practices into our broader business strategy. Our efforts are further shaped by the principles of the United Nations' [Universal Declaration of Human Rights](#), the fundamental labour rights enshrined by the [International Labour Organisation's Declaration on Fundamental Principles and Rights at Work](#), and the [Convention on the Rights of the Child](#), with respect to prohibition of child labour.



Corporate culture and business ethics and integrity

At Roche, integrity and ethical conduct form the foundation of our corporate culture. Upholding high standards of business ethics across our value chain is essential to maintaining trust and sustainable performance. We achieve this through a comprehensive compliance management program that includes training, risk management, anti-modern slavery policies, due diligence and systems for reporting and investigating issues, all while protecting individuals who report concerns in good faith.

We tackle modern slavery through a set of enterprise-wide policies and directives that guide ethical conduct, respect for human rights and responsible business practices. These establish uniform minimum standards across the Roche Group as well as for implementation with our business partners. Together, they provide a consistent framework to ensure compliance with international regulations and meet stakeholder expectations.

Relevant internal policies and practices include the [Roche Group Code of Conduct](#), [Roche Supplier Code of Conduct](#), [Roche Directive on Integrity in Business](#), [Directive on Compliance Risk & Opportunity Assessment and Management for the Roche Group](#), and the [Roche Group Policy on Safety, Security, Health and Environmental Protection \(SHE\)](#).

What have been the actions taken by Roche Australia to assess and address the risks?

The **Chief Compliance Officer (CCO)** is responsible for the global compliance framework. The CCO reports directly to the **General Counsel**, a member of the Enlarged Corporate Executive Committee, and provides regular updates to the Corporate Governance and Sustainability Committee and, when required, to the Audit Committee.

The CCO is supported by more than **150 local Compliance Officers** across the Roche Group. Locally, each Roche Australia entity has a dedicated Compliance Officer who fosters a culture of integrity by providing guidance, delivering training, monitoring adherence to compliance standards and documenting and addressing ethical concerns. They also contribute to risk management and encourage employees to raise potential misconduct through established channels. In addition, they are responsible for identifying human rights risks, particularly in the supply chain.

Throughout 2025, Roche maintained its **Human Rights Compliance Community**, a specialised global network of experts dedicated to maturing our human rights due diligence. As a participant, Roche Australia leverages this forum to align local operations with global best practices and evolving cross-jurisdictional regulations. This collaboration ensures that our Australian operations remain at the forefront of human rights expertise, allowing us to proactively identify and mitigate risks through shared intelligence and unified compliance standards.

Our People

At Roche, our people are at the core of our work. Our approach centres on fostering engagement, inclusion and professional growth, with focus on safe and healthy workplaces. Insights from our Global Employee Opinion Survey are used to enhance employee experiences, thereby strengthening the overall workplace environment and improving organisational effectiveness.

Our approach to working conditions and employee rights is anchored in corporate policies covering fair employment, health and safety, and equitable remuneration which are outlined in the [Roche Group Employment Policy](#). These policies mitigate risks such as discrimination and unsafe working practices. At every Roche Australia site, **People and Culture** contacts support the enforcement of these policies, contributing to a respectful work culture.



What have been the actions taken by Roche Australia to assess and address the risks?

Roche Australia offers educational initiatives to raise awareness including training targeted at all employees, as well as practice labs and customised training for line managers and risk and opportunity managers. We require all our employees and anyone acting on our behalf to complete **global mandatory Roche Behaviour in Business training**. This training covers the Roche Group Code of Conduct requirements, bribery and corruption risks, conflicts of interest, gifts and entertainment, discrimination and harassment, use of digital communication and engagement with business partners and the supply chain. In 2025, we achieved a global training completion rate of **99.4%**.

*Roche fosters a **speaking-up culture** where employees and stakeholders are empowered to report unethical conduct, including any suspected modern slavery within our operations or supply chains. Central to this is our [SpeakUp line](#), a secure 24/7 channel operating in 104 countries and 42 languages.*

All incidents are managed through our **Business Ethics Incident Management System**, overseen by the Chief Compliance Officer. In Australia, our Whistleblower Policy ensures local legal protections under the *Corporations Act 2021* (Cth) and *Taxation Administration Act 1953* (Cth).

We expect our business partners to maintain their own retaliation-free grievance mechanisms. Where violations occur, Roche mandates corrective action and may provide remediation support through PSCI platforms.

Every report is investigated, with outcomes monitored and significant violations reported to the Audit and Corporate Governance committees. Non-retaliation remains a core principle of our process.

Roche's work in the industry

Establishing an open and constructive dialogue with external stakeholders is essential at Roche. Roche Australia engages with regulatory and industry bodies, communities and NGOs to contribute to policy and regulatory discussions that sustain innovation and improve access to healthcare, and to support local development, advance equitable health outcomes and strengthen social impact.

As a founding member of the **Pharmaceutical Supply Chain Initiative (PSCI)**, we actively contribute to audit protocols, management systems and sector projects. This engagement strengthens supplier oversight, creates industry alignment and reinforces our commitment to responsible sourcing.

What have been the actions taken by Roche Australia to assess and address the risks?

Roche's business partners

Supplier Code of Conduct

The [Roche Supplier Code of Conduct](#) sets minimum standards for ethical, sustainable and responsible business practices across our suppliers. It outlines our commitment to **integrity, respect for human rights, environmental stewardship and fair working conditions**. It requires our business partners to uphold the same level of responsibility in relation to compliance and sustainability.

Compliance with the Code is a mandatory contractual requirement for all suppliers working with the Roche Group. It requires them to comply with applicable laws and to extend equivalent standards throughout their supply chains. Non-compliance may lead to corrective action, exclusion from future opportunities or termination of the business relationship.

The Code addresses critical areas such as freely chosen labour, child labour and young workers, fair treatment and non-discrimination, wages, benefits and working hours, forced or compulsory labour, and responsible sourcing of minerals and metals.

The Code aligns with internationally recognised standards, including the UN Guiding Principles on Business and Human Rights, the OECD Due Diligence Guidance for Responsible Business Conduct, ISO 26000, ILO Core Conventions, and the PSCI Principles. Implementation is supported by Roche's procurement processes, supplier audits and engagement programmes such as the Supplier Sustainability Assurance Visit (SSAV).



What have been the actions taken by Roche Australia to assess and address the risks?

Roche's business partners

Policy on Third Party Spend

The Roche Policy on Third Party Spend defines the rules and criteria for procuring goods and services, embedding sustainable practices within our procurement activities. The policy outlines key procurement management practices to manage sustainability performance and ensure suppliers meet our standards throughout the supplier life cycle, as described in the Roche Supplier Code of Conduct. These practices include **risk management, supplier due diligence, performance monitoring and procedures for managing non-compliance.**



Group Directive: Business Partner Management

The Group Directive: Business Partner Management defines Roche's framework for managing business partner relationships, requiring business partners to uphold sustainability, integrity and compliance with Roche's high ethical and quality standards. Minimum expectations cover responsible conduct, risk mitigation and consistent application across the business partner life cycle. The policy sets out structured processes for partner onboarding, monitoring and review, with the goal of mitigating risks and providing assurance that our business partners are managed responsibly.

A self-assessment checklist, the business partner management tool, complements the Directive. It digitises the comprehensive life cycle approach to managing partner relationships, integrating ethical and compliance standards seamlessly from the initial market assessment and onboarding phase through the contract renewal or termination.

Due diligence and risk assessment practices

Roche conducts stringent due diligence on its suppliers and business partners to ensure we identify, evaluate, and mitigate risks before and during every partnership.

What have been the actions taken by Roche Australia to assess and address the risks?

Roche's business partners

The due diligence framework implemented at Roche is based on the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. **The framework applies across our value chain and covers the following main aspects:**

1. *Embedding due diligence in governance, strategy and business model.*
2. *Regularly engaging with stakeholders in all key steps of the due diligence process. This includes input gathered through our double materiality assessment (**DMA**) - a methodology that combines an inside-out perspective, which considers our impacts on people and the environment, with an outside-in perspective, which assesses how sustainability matters affect our business model - as well as dialogue with employees, suppliers, industry initiatives and civil society organisations. Relevant external indices such as the Global Slavery Index and UNICEF's Children's Rights in the Workplace Index also support risk identification and prioritisation.*
3. *Identifying and assessing negative impacts on people and the environment through our DMA, complemented by internal compliance processes, site assessments, supplier audits and human rights risk assessments.*

4. *Taking action to address adverse impacts. Group-wide policies guide the mitigation of identified negative impacts. We set measurable targets to drive sustainability performance and define action plans that mitigate negative impacts and deliver on our targets.*
5. *Tracking the effectiveness of these efforts through regular reporting and communicating, which is supported by established internal controls and oversight processes. Concerns can be raised confidentially via our grievance mechanisms including the Roche Group speak-up channel (see below). Severe supplier violations are managed through corrective action plans or, if unresolved, may lead to termination of the relationship.*

The [Roche Directive on Human Rights Due Diligence for Business Partners](#) establishes the framework to protect human rights across the Roche value chain, applying to Roche employees, contractors, external workers and business partners. The policy covers both **upstream activities** (direct materials, products and indirect goods and services) and **downstream activities** (distribution of products and services). It sets out principles for our human rights due diligence, including identification and assessment of high-risk operations, stakeholder engagement to understand potential concerns, and the design of effective responses.

What have been the actions taken by Roche Australia to assess and address the risks?

Roche's business partners

Roche maintains its commitment to ethical standards by continually auditing and enhancing its due diligence frameworks.

In 2025, Roche implemented its Internal Control over Sustainability Reporting framework. This framework includes a comprehensive risk assessment and thorough evaluation of our underlying data collection and reporting processes, supplemented by development of internal controls to mitigate key risks in sustainability reporting. Currently, it primarily focuses on **material risks** and **key controls** to ensure the complete and accurate reporting of selected metrics.

Business partner dialogue and training

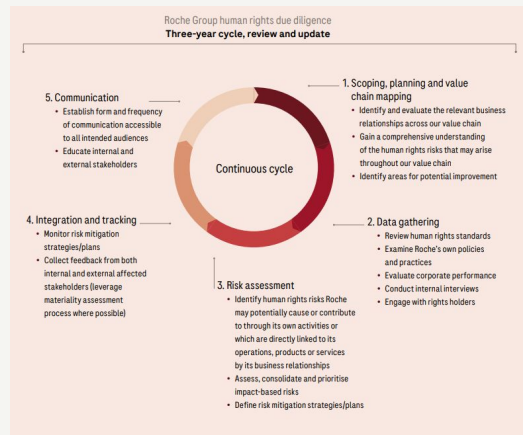
Roche engages in targeted supplier dialogues, such as **Supplier Day**, and provides dedicated training modules for our business partners to strengthen awareness of labour rights and workplace standards. Through a dedicated training portal, Roche equips suppliers with our Behaviour in Business curriculum, ensuring they have the practical knowledge to build and sustain ethical operations.



How is the effectiveness of Roche Australia's actions assessed?

Ongoing human rights risk assessment

We conduct human rights risk assessments every three years with annual reviews. These assessments identify and evaluate potential negative human rights impacts arising from our activities and business relationships, which allows us to prioritise risks according to their potential impact and develop tailored mitigation strategies.



[Source: Roche Annual Report 2025 \(page 145\)](#)

We approach the assessment in accordance with the following principles:

01 *Actual and potential risks are identified, weighted and prioritised according to their severity and likelihood. We provide mechanisms for our employees and business partners to raise concerns so that corrective and remedial measures can be implemented if needed.*

02 *Continuous risk identification, impact assessment and active risk management processes involve all stakeholders.*

03 *Due diligence documentation is stored according to Roche's corporate records management requirements and applicable laws. Human rights related activities and metrics are reported and maintained for transparency.*

Our human rights risk assessment 2023 cycle, reviewed and reconfirmed in 2025, identified a number of key focus areas to human rights and societal well-being. More detail in relation to these areas, including our respective commitments and actions can be found in our [Roche Annual Report 2025](#).

How is the effectiveness of Roche Australia's actions assessed?

Ongoing human rights risk assessment

Transparency and supportive documentation

Roche believes that trust is earned through transparency. That's why we maintain supportive documentation of our due diligence processes. We track carefully selected Key Performance Indicators (KPIs) - including audit frequency, compliance rates, and resolution speed - to measure the tangible impact of our initiatives. By reporting these metrics alongside our legally binding human rights activities, we maintain transparent communication and absolute accountability with all stakeholders.

We also maintain transparency through comprehensive non-financial public reporting, including through our annual Roche Sustainability Report. These reports offer a detailed account of our strategy and progress, covering supplier conduct and our broader societal impact.

By sharing these outcomes, we facilitate rigorous external evaluation of our performance against our core commitments.

SSAV and supplier engagement

Engaging with suppliers is essential to managing labour rights risks and maintaining business resilience.

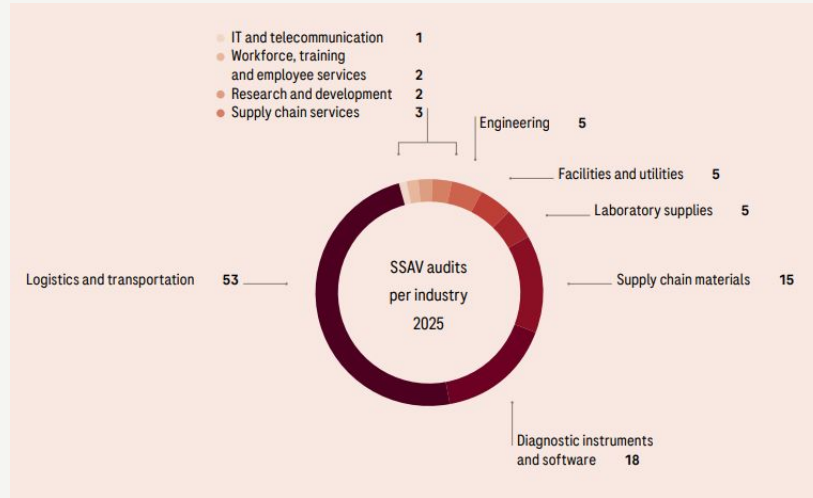
Roche employs a formal annual risk assessment to identify suppliers most vulnerable to human rights violations. This automated, traceable methodology incorporates four globally recognised benchmarks: the KidsRights, Global Slavery, OECD, and Global Rights indexes. Risk profiles are further refined by evaluating industry type, location, and historical compliance.

Partners identified as high-risk or significant undergo rigorous auditing via the SSAV program. This framework utilises PSCI-approved independent auditors to develop documented action plans and conduct follow-up assessments. To drive continuous improvement, we maintain sub-tier oversight and publicly disclose program KPIs. While we prioritise working collaboratively with suppliers to uphold our standards, persistent non-compliance results in a formal mitigation plan, which can escalate to relationship termination.

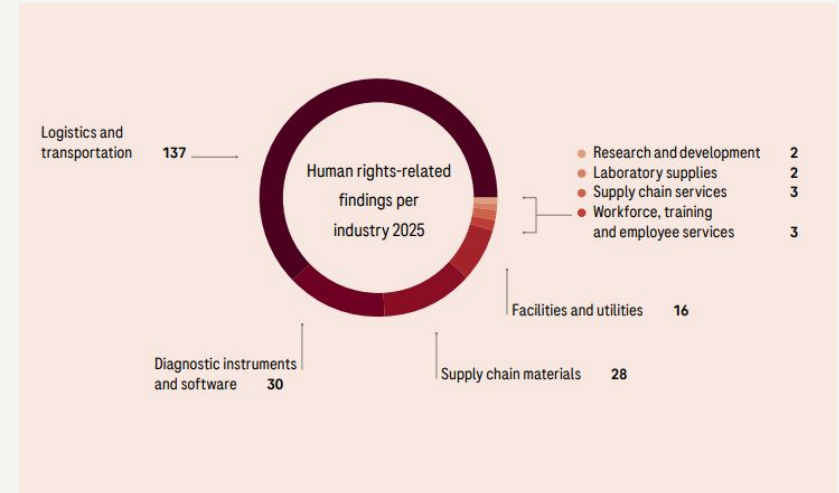
In 2025, **109** sustainability audits were conducted globally, **21** of which were triggered by high human rights risk, leading to **59** sustainability audits with human rights and labour findings and a total of **221** findings with any human rights impacts. **10** substantiated incidents related to human rights violations triggered terminations of contracts. Our primary Australian 4PL logistics service provider was audited in May 2025, which resulted in **zero human rights-related findings**.

How is the effectiveness of Roche Australia's actions assessed?

Ongoing human rights assessment



[Source: Roche Annual Report 2025 \(page 149\)](#)



[Source: Roche Annual Report 2025 \(page 150\)](#)

Describe the process of consultation with any entities that Roche Australia owns or controls

In preparing this joint Modern Slavery Statement, we confirm that **Mandatory Criterion Six**, requiring the description of the consultation process with owned or controlled entities, does not apply to Roche Australia.

Neither of the reporting entities named in this statement owns or controls any other entities, thus exempting us from this requirement.

We have focused our consultation on addressing modern slavery risks collaboratively across our operations and supply chains.



Additional relevant information

Life-changing innovation is only meaningful if it reaches those who need it.

We collaborate with governments, customers, health systems and other partners to remove barriers and advance equitable health outcomes, so patients everywhere benefit from earlier detection, targeted treatment and better outcomes.

This helps us bring our diagnostics and medicines to more patients, faster.

Amidst global health challenges, ensuring patients have access to innovative, high-quality medicines and diagnostics has never been more critical and an imperative for securing healthier and stronger economies.

To advance equitable health outcomes for patients and universal health coverage, Roche focuses on three key aspects:

Inclusive
research and
development



Health system
strengthening



Access

Through our Global Access Programs, Roche works with trusted partners and stakeholders at the global, regional and local levels to help address relevant access gaps and build strong and resilient healthcare systems. **To reinforce our commitment to increasing access to innovation, Roche has committed to the following sustainability strategy access goals:**

Pharmaceuticals

- Treat 3 times as many patients with our strategic pharmaceutical portfolio by 2029
- Treat 3 times as many patients with our strategic pharmaceutical portfolio by 2029
- Double the number of patients receiving our core pharmaceutical therapies in low and lower-middle-income countries by 2026
- Triple the societal impact delivered with our strategic pharmaceuticals portfolio by 2029

Diagnostics

- Reach twice as many patients (230 million lives) with high-medical-value diagnostics solutions by 2029

Global health security

- Roche is committed to the research and development of new antibiotics and testing solutions, and to working with external partners to make these available to healthcare systems

Additional relevant information

Oversight

Principal oversight is provided by the respective Executive leadership teams, and the Governance Committee of Roche Products Pty Limited and the Compliance Committee of Roche Diagnostics Australia Pty Limited.

Approval

The Statement was approved by the principal governing bodies of each reporting entity: approval of this Statement was granted for Roche Products Pty Limited through the Board of Directors on 23 June 2026 and for Roche Diagnostics Australia Pty Limited through the Board of Directors on 23 June 2026.

The Executive leadership, led by the Managing Director of each entity, has signed this Statement as the responsible members representing their respective entities.

DocuSigned by:



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Nic Horridge

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Doing now what patients need next