

Modern Slavery Statement

Year ending 31 December 2023

Roche Products Pty Limited

Roche Diagnostics Australia Pty Limited

Executive Summary

Roche Products Pty Limited and Roche Diagnostics Australia Pty Limited, collectively referred to as Roche Australia, are dedicated to the worldwide effort to eradicate modern slavery. This executive summary highlights our main activities and progress from our Modern Slavery Statement for the reporting period ending 31 December 2023.

Throughout the year, we have maintained a steadfast commitment to identifying and mitigating Modern Slavery risks within our operations and supply chains. Our actions are guided by a strong ethical framework, reinforced by the Roche Supplier Code of Conduct and aligned with international standards such as the UN Guiding Principles on Business and Human Rights.



Key achievements:

- **Legislative Collaboration:** Roche Australia has enhanced Roche Canada's anti-slavery initiatives by sharing insights from our mandatory measures, including supply chain audits and NGO partnerships.
- **Industry engagement:** Our procurement team has actively participated in external forums to promote awareness and drive ethical sourcing practices in the wider business community.
- **Healthcare initiatives:** Roche Group's commitment to universal health coverage, in alignment with the United Nations Sustainable Development Goals, directly addresses root causes of modern slavery such as poverty and limited healthcare access.
- **AI Integration:** Roche Australia leverages AI with LLM to proficiently fulfil modern slavery due diligence questionnaires from our Australian healthcare sector customers. We are committed to applying the learnings from this advanced technology to refine our supplier due diligence processes and enhance our assessments of modern slavery risks in the future.

Progress overview:

- **Risk assessment:** We conducted comprehensive risk assessments of our suppliers, identifying potential modern slavery risks and implementing tailored response strategies.
- **Supplier engagement:** Through rigorous audits, assessments, and relationship management, we have worked closely with our suppliers to ensure adherence to our ethical standards.
- **Employee training:** A high completion rate of Human Rights training programs amongst our employees has been achieved, indicating strong awareness and understanding of the issue.
- **Transparent reporting:** Our commitment to transparency is reflected in detailed non-financial reporting, including updates on supplier conduct and ethical behaviour.

Looking ahead:

As we move forward, Roche Australia will continue to implement and refine our strategy to combat modern slavery. We will enhance our monitoring and assessment frameworks, engage in collaborative efforts to improve industry practices, and remain transparent in our progress. Our dedication to Human Rights, ethical business conduct, and the well-being of all individuals underpins every action we take towards eradicating modern slavery.

Roche Australia's Modern Slavery Statement

This statement has been published in accordance with the Modern Slavery Act 2018. It provides an update on the progress that Roche Products Pty Limited and Roche Diagnostics Australia Pty Limited has made during the year ending 31 December 2023, and will continue to make, to prevent modern slavery in its business and supply chains.

Modern slavery is a grave violation of human rights that strips victims and survivors of their dignity, fundamental rights, and freedoms. It encompasses various exploitative practices such as trafficking in persons, slavery, forced marriage, servitude, forced labour, deceptive recruiting, and debt bondage.

At Roche, we are committed to addressing modern slavery in all its forms. For over 125 years, we have prioritised the protection of human rights within our operations and throughout our value chain. As part of our sustainability commitment, we actively contribute to creating positive impacts in areas within our sphere of influence.

We firmly believe in a world where there are no barriers to progress and where everyone can build a better life. Upholding human rights and working collectively to eliminate modern slavery is essential to achieving this vision.

Dedication

This Modern Slavery Statement for the 2022-23 reporting period is dedicated to all the passionate individuals and organisations who tirelessly work towards preventing modern

slavery and providing support to victims and survivors. We commend their efforts in addressing this urgent issue and helping those affected by modern slavery rebuild their lives.

Acknowledgement of Country

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.

Mandatory Reporting Criteria

1. Who is the reporting entity?

The Statement relates to the following 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 of the named entities have been consulted. Neither of the named entities owns or controls any other entities.

2. What are its structures, operations, and supply chains?

F. Hoffmann-La Roche AG, widely recognized as **Roche**, is a Swiss multinational holding healthcare company that operates worldwide. Roche Products Pty Limited and Roche Diagnostics Australia Pty Limited, collectively referred to as **Roche Australia**, are the Australian affiliates of the Roche Group, importing, distributing, and marketing various healthcare products such as pharmaceuticals, diagnostic, and medical devices in Australia.

Roche is a leading global biotech company with over [125 years of history](#) and operations across more than 100 countries, employing over 103,000 people worldwide. For more than [six decades in Australia](#), Roche 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 affiliates of the Roche Group, we comply with The Modern Slavery Act 2018, proactively evaluating modern slavery risks in our supply chain. We ensure adherence to workplace laws and the fair and respectful treatment of our employees and contractors.

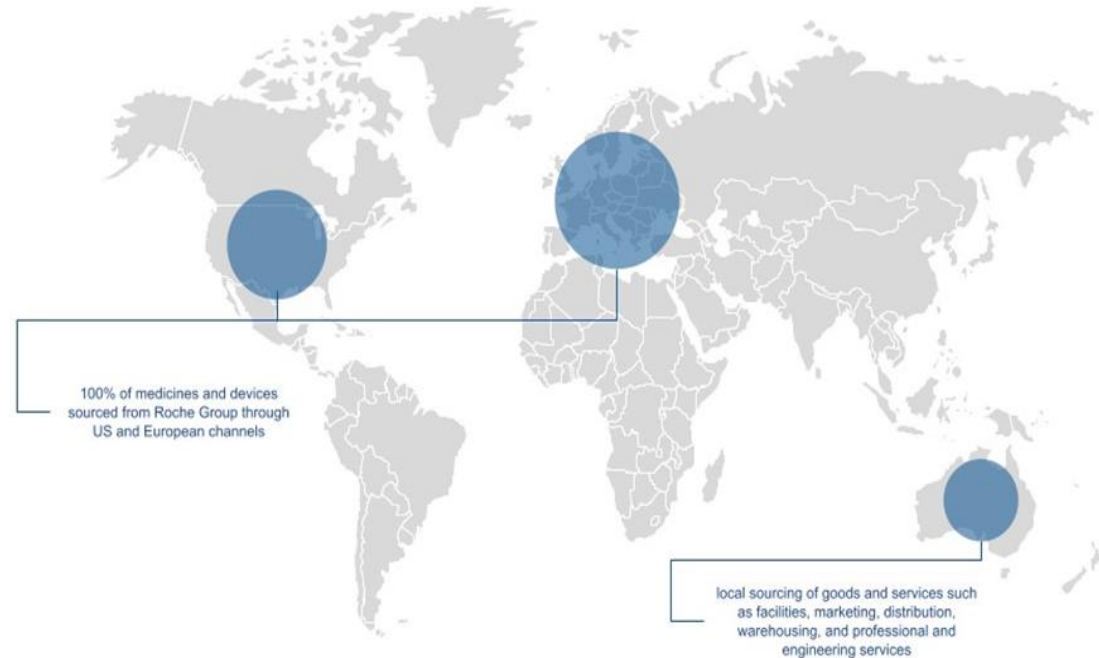
Our operations include sourcing from Roche Group entities and select third-party suppliers, with local supplier partnerships for essential services like facilities, logistics, marketing, and professional services. We uphold a supply chain committed to ethical practices and human rights standards.

The Roche Group supply chain encompasses entities upstream, involved in R&D and manufacturing, and downstream, including our network of customers, partners, and suppliers in the Australian market. These relationships are founded on shared principles of integrity, innovation, and human rights.

Roche Products Pty Limited and Roche Diagnostics Australia Pty Limited employ approximately 520 dedicated individuals. We are deeply committed to upholding their rights and ensuring a workplace that promotes dignity, fairness, and compliance with all relevant workplace

laws. Our aim is to foster a supportive work environment where every employee can thrive.

Dedicated to sustainability and upholding Roche's reputation for reliability and quality, our operations and partnerships are designed to positively impact society and contribute to Roche Group's success. Our diverse healthcare product offerings address the needs of healthcare professionals, patients, and the Australian healthcare system, with an unwavering commitment to quality, safety, and efficacy.



3. What are the risks of Modern Slavery in the Supply Chain?

Modern slavery risks in supply chains are multifaceted and can appear at various levels of an organisation, including within its network of suppliers and partners. Roche recognizes that despite our thorough risk assessments and due diligence processes, which suggest a minimal likelihood of direct involvement in modern slavery, there is still a risk that such practices may exist within our supply chain.

We understand that modern slavery risks can arise when sourcing products and services, particularly from third-party providers. As a preventive measure, our supplier onboarding process includes ethical considerations and modern slavery policies to ensure alignment with our values from the outset. Roche maintains rigorous standards for all suppliers and business partners, as detailed in the [Roche Supplier Code of Conduct](#).

Locally, we assess suppliers in various sectors using risk indicators related to their sector, industry, products, services, geography, and the nature of the entity itself. Our procurement team uses these indicators to identify suppliers with higher risk profiles and formulate appropriate strategies, which may involve closer relationship management and compliance checks.

We pay special attention to areas such as the production of packaging and medical ancillaries, and local services like digital design and labour-intensive operations, including

transport and facilities management, to manage and mitigate modern slavery risks.

Roche is committed to ensuring compliance within our supply chains and does not pass this responsibility onto our business partners. We emphasise the importance of active engagement in addressing modern slavery and are prepared to work with our suppliers on any necessary corrective actions.

Our ongoing commitment includes enhancing our practices, continually monitoring for risks, and proactive management to address any issues related to modern slavery, all while adhering to our principles of responsibility, transparency, and respect for human rights.

4. What have been the actions taken to assess and address the risks?

Policies and Practices

At Roche, our commitment to human rights is anchored in recognized frameworks such as the [UN Human Rights Council's Ruggie Framework](#), UN Global Compact Principles, and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. Our internal codes, including the [Roche Group Code of Conduct](#) and the [Roche Supplier Code of Conduct](#), reflect these global standards and drive the pursuit of excellence and ethical practices across our operations.

Our interactions with third-party entities are grounded in principles that prioritise quality, service, sustainability, and ethical conduct. We expect our suppliers to adhere to these standards, as outlined in the Pharmaceutical Supply Chain Initiative ([PSCI](#)), which emphasises:

- **Ethics:** Conducting business with integrity and ethical responsibility.
- **Human Rights and Labour:** Respecting the dignity and rights of workers.
- **Health and Safety:** Ensuring a safe and healthy work environment.
- **Environment:** Operating sustainably with minimal environmental impact.
- **Management Systems:** Promoting continuous improvement and adherence to ethical principles.

Our Compliance Officers play a pivotal role in ensuring these principles are applied consistently, reinforcing responsible business practices globally. At every Roche site, Human Resources contacts support the enforcement of non-discrimination and harassment policies as outlined in the [Roche Group Employment Policy](#), contributing to a respectful work culture.

We regularly assess and benchmark our human rights practices against industry standards to ensure they remain robust. This includes a comprehensive eLearning program on human rights principles for all employees, which achieved a completion rate of 99.29% in 2023, alongside local and global initiatives to reinforce awareness.

Due diligence activities with suppliers and business partners incorporate human rights considerations, and we maintain strong agreements that uphold these principles. Collaborative efforts, particularly with industry groups like PSCI, are central to our approach in fostering the protection of human rights.

[Transparent communication](#) about human rights is essential to Roche. We employ various channels to keep stakeholders informed, reflecting our deep-seated commitment to ethical business conduct and the safeguarding of [human rights](#) within our supply chain and operations.



Supply Chain Transparency

Roche holds our suppliers to stringent human rights standards consistent with our values and principles, as defined in our

Supplier Code of Conduct. This code forms part of every contract and requires suppliers and business partners to manage human rights risks proactively, not only within their operations but also across their own supply networks. Our commitment extends to the principles of the Pharmaceutical Supply Chain Initiative (PSCI), which are embedded in our contracts and supplier engagements.

Our due diligence process for both potential and current suppliers and business partners is risk-based and incorporates human rights considerations. This process is outlined in the [Roche Directive on Human Rights Due Diligence for Business Partners](#) and supported by [global guidance](#), checklists, and IT tools designed to ensure consistent implementation. We focus on areas such as working conditions, fair treatment, and non-discrimination within our supply chain, and conduct PSCI-based audits on those identified as high risk.

We have a formal methodology for evaluating suppliers, selecting our business counterparts with careful consideration of human rights, among other factors. This includes using industry-standard questionnaires and undertaking risk-based actions to address any identified issues.

Roche provides a [SpeakUp line](#) for reporting any compliance concerns or potential human rights violations, ensuring that all reports are taken seriously and investigated thoroughly, with appropriate remedial actions taken as needed.

To combat modern slavery risks, Roche has implemented several actions:

- **Supplier Code of Conduct:** A comprehensive document that sets forth ethical behaviour, human rights protection, and safe working conditions, mandatory for all suppliers.
- **Due Diligence Practices:** Thorough vetting processes guided by international standards and focused on risk identification and mitigation, with consequences for non-compliance.
- **Audits and Assessments:** Conducted for high-risk partners, with the potential for disqualification and relationship termination if our standards are not met.
- **Risk Assessment:** A systematic approach to evaluating human rights risks among suppliers, ensuring traceability throughout our supply chain.

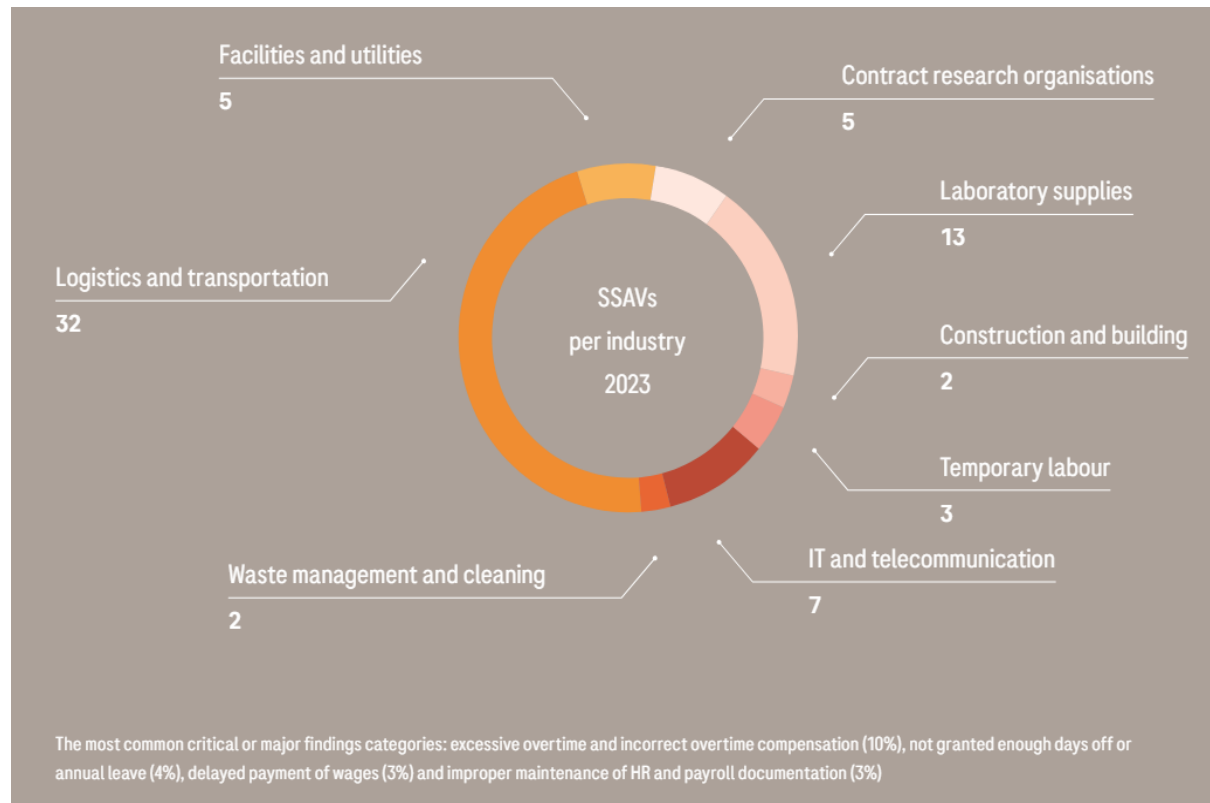
Our local operations mirror our global commitment, with local supply chain oversight and risk stratification guiding our engagement and mitigation strategies. We conduct due diligence visits, provide targeted training, and manage supplier relationships to ensure compliance and continuous dialogue.

Roche's approach to addressing modern slavery reflects our commitment to ethical conduct and the protection of human rights. We maintain a vigilant, strategic, and responsive stance, ensuring the integrity and responsibility of our business practices throughout our Australian operations and global supply chain.

5. How is the effectiveness of actions proposed to be assessed?

Roche has established a comprehensive framework to evaluate the effectiveness of our actions against modern slavery, ensuring that our commitment to ethical practices translates into real-world impact.

Supplier Audits and Assessments: We conduct regular, risk-based audits to ensure suppliers comply with our anti-slavery policies, forming a core component of our Supplier Sustainability Assurance Visit (SSAV) program. In 2023, the SSAV program informed the termination of 27 contracts due to violations and facilitated 69 sustainability audits, leading to 111 human rights-related findings. Each audited supplier was mandated to develop a formal corrective action plan (find an example [here](#)).



Source: [Roche Annual Report 2023 \(page 75\)](#)

Performance Metrics and KPIs:

Key performance indicators are carefully selected and monitored, providing clear metrics on the impact of our initiatives, such as audit frequency, compliance rates, and issue resolution.

Training Completion Rates: We track the completion rates of our mandatory eLearning programs on human rights, which reached 99.29% in 2023, to gauge awareness and preparedness within our organisation.

Remediation Actions: The number and effectiveness of remediation actions are analysed to ensure timely and effective resolution of modern slavery issues.

Stakeholder Engagement: Feedback from stakeholders, including industry peers and [members](#) of the Pharmaceutical Supply Chain Initiative (PSCI), is actively sought to gauge the effectiveness of our actions.

Public Reporting: We maintain transparency through [public reporting](#) on our actions and outcomes, allowing for external evaluation of our performance.

Benchmarking: Our initiatives are [benchmarked](#) against recognized industry standards, a process that not only confirms adherence to best practices but also drives ongoing enhancement of our efforts.

Continuous Improvement Process: Insights from these assessment methods are used to refine our policies and practices, underlining our commitment to ongoing progress.

As an example, our Global Procurement fleet team has implemented stringent criteria for selecting electric vehicle providers, emphasising compliance with our Supplier Code of Conduct, OECD Guidance on Responsible Supply Chains, ethical sourcing of minerals, and responsible recycling practices.

These comprehensive assessment measures enable Roche to critically evaluate and ensure the effectiveness of our efforts to mitigate modern slavery risks. Our dedication to transparency, accountability, and continuous improvement drives us towards the goal of eradicating modern slavery from our operations and supply chains.

Successful collaboration with business partners to avoid negative impacts on human rights

Between 2021 and 2022, Roche observed findings related to human rights and fair labour practices notably within the logistics industry segment.

Audits performed within the SSAV programme highlighted several situations within the logistics industry where companies did not introduce and manage appropriate policies and procedures to protect the rights of employees. A recurring problem was the lack of appropriate control mechanisms regarding the working conditions (especially overtime and days off) of truck drivers and warehouse workers. All non-compliances were noted in the final audit report and reflected within the Corrective Action Plan (CAP) addressing proper actions to remove them.

The CAP contained the implementation of appropriate policies, systems and procedures to secure employee rights. These include the implementation of electronic

working time registration systems or appropriate control mechanisms within the existing operational processes, as well as the implementation of dedicated training for managers and operational team leaders to raise their awareness within the area of human rights and labour.

The effectiveness and efficiency of the actions implemented within the CAP have been confirmed during the follow-up audits by an independent external auditor.

At Roche, we are aware that throughout the supply chain we must actively cooperate with our suppliers and business partners to minimise the risk of non-compliance, especially related to human rights and fair labour practices. At the same time, we are constantly improving our internal due diligence processes and procedures, which guide our activities and risk analysis beyond the tier-1 level.

Source: [Roche Annual Report 2023 \(page 77\)](#)

6. Describe the process of consultation with any entities the reporting entity 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 us. Neither of the 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.

7. Any other relevant information

In compliance with Mandatory Criterion Seven, Roche Australia provides further details that underscore our dedication to the elimination of modern slavery and the impact of our wider corporate activities in this critical area.

- Roche Australia has provided valuable insights from our mandatory anti-slavery measures to Roche Canada. Our supply chain audit methodology and our partnerships with NGOs, both crucial aspects of our Australian compliance, have been shared. This collaboration has improved our joint initiatives against modern slavery.
- Our procurement team actively participates in various industry forums, including those in the legal sector, alongside groups like [CASME](#), to elevate consciousness and champion ethical sourcing within the broader business community. This involvement is

key to advocating for a united stance against modern slavery and promoting more responsible sourcing standards throughout different industries.

- Tackling the fundamental causes of modern slavery, including poverty, educational deficits, and inadequate healthcare, is at the heart of Roche Group's mission. Our commitment to [universal health coverage](#) aligns with the [United Nations Sustainable Development Goals](#) and forms a crucial part of our sustainable business strategy. Our goal is to improve global healthcare access, thereby diminishing the vulnerabilities that can result in exploitation.



- Roche Australia is currently utilising AI with LLM to efficiently respond to due diligence questionnaires from our customers. Looking ahead, we plan to extend the use of this technology to further enhance the vetting process of due diligence questionnaires exchanged with our suppliers.
- Our commitment to sustainability and ethical operations is transparent in our [non-financial reporting](#), which provides a thorough account of our suppliers' conduct and our endeavours towards positive societal impact.

This Modern Slavery Statement reflects Roche Australia's comprehensive approach to responsible business conduct. Our active involvement in legislative support, industry collaboration, and health initiatives forms a multifaceted strategy against modern slavery. We are determined to meaningfully impact societal conditions that foster modern slavery and to maintain our commitment to ethical business practices.

Closing statement

In closing our Modern Slavery Statement for the 2022-23 reporting period, Roche Australia reaffirms our commitment to eradicating modern slavery from our operations and supply

chains. We reflect on our achievements and acknowledge the dedicated efforts of our team and partners in addressing this violation of human rights.

The statement has provided a view of Roche Products Pty Limited and Roche Diagnostics Australia Pty Limited's structures, operations, and supply chains up to 31 December 2023. We have identified the risks of modern slavery, taken steps to mitigate these risks, and measured the success of our actions. Through collective effort and strategic planning, we aim to effect positive change and contribute to the global fight against modern slavery.

Roche Australia's contributions to developing modern slavery legislation and promoting global awareness emphasise our commitment to ethical practices and positive social impact. Our support for initiatives like universal health coverage underlines our strategy to address the conditions that foster modern slavery.

At the core of our efforts is a profound respect for human rights and the goal of a world without exploitation. With this goal in mind, we continuously work to strengthen our impact and improve transparency in our quest to eliminate modern slavery.


Oversight

Principal oversight is provided by the respective Executive leadership teams, and the Governance Committee of Roche Products Pty Limited and the Compliance & Risk 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 at the Governance Committee meeting on 16 May 2024 and for Roche Diagnostics Australia Pty Limited through executive briefings with the Compliance and Risk Committee, culminating in the final meeting on 26 June 2024.

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

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June 27, 2024

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Signed by:

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June 27, 2024

Agnes Ho
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