



# Modern Slavery Statement

Year ending 31 December 2024

**Roche Products Pty Limited**  
**Roche Diagnostics Australia Pty Limited**



# Executive Summary

Modern slavery is a violation of human rights, stripping individuals of their inherent dignity and freedom. At Roche, we prioritise human rights and are committed to contributing to the eradication of these injustices within our operations and value chain. Driven by our sustainability ethos, we actively work towards a world where individuals have the opportunity to thrive, and our efforts to combat modern slavery are central to this aspiration.

This Modern Slavery Statement is a joint statement published by Roche Products Pty Limited and Roche Diagnostics Australia Pty Limited (collectively, **Roche Australia**), who are both reporting entities under the *Modern Slavery Act 2018* (Cth). It provides an update on the progress that Roche Australia has made during the year ending 31 December 2024, and will continue to make, to prevent modern slavery in its business and supply chains.

Throughout 2024, Roche Australia reinforced its commitment to identifying and mitigating modern slavery risks across its operations and value chain. Key strategies included upholding relevant policies, conducting rigorous risk assessments, performing comprehensive due diligence on suppliers, and fostering a speak-up culture. We maintain vigilance in our supply chain, with a particular focus on sectors and geographies that may present higher risks for vulnerable populations. Roche Australia also engages in collaborations aimed at enhancing community resilience against exploitation, and we are committed to continuous improvement and transparent communication regarding these efforts. Our actions in Australia align with and are an integral extension of our global efforts to combat modern slavery.



## Key Achievements

- **At the global level, Roche successfully completed the UN Global Compact Business and Human Rights Accelerator programme**, leading to the development of a value chain mapping highlighting human rights focus areas.
- **At the global level, Roche developed an internal Roche Human Rights Due Diligence Practical Guide** to enhance employee understanding of global human rights risk assessment and due diligence processes.
- **The Roche Group launched the Human Rights Compliance Community**, a global network of compliance experts to enhance internal expertise, ensure regulatory compliance, and promote a unified approach to improving human rights across Roche.
- Further **embedded sustainability into the Roche Group's updated corporate strategy**, focusing on six key priority areas for maximum impact.
- Created a **new dedicated role within the Roche Group Compliance team** to improve the process for managing risk and opportunities, including ethical business practices and respect for human rights, to reinforce oversight and assurance.
- Roche Australia **enhanced its third-party vendor due diligence questionnaire** to clarify supplier obligations with respect to modern slavery risks and strengthen Roche Australia's ability to assess and manage such risks across our supplier base.



## Progress overview

- **Supplier assessment and engagement:** Roche rigorously assesses suppliers, proactively identifying those with higher human rights and modern slavery risks. Our global due diligence includes comprehensive sustainability audits of significant suppliers to uphold ethical standards, with 118 such audits conducted globally in 2024. Roche Australia actively applies this targeted due diligence. For instance, a local Australian transport services provider, selected due to its modern slavery risk profile, was audited in February 2024. This audit was a part of our Supplier Sustainability Assurance Visit (SSAV) program, which is aligned with Pharmaceutical Supply Chain Initiative (PSCI) principles, and identified no modern slavery-related findings. This process demonstrates our focused approach to mitigating such risks within our Australian value chain.
- **Focus areas:** The Roche Group's annual human rights risk assessment review validated our strategic focus on the key areas where we can make the most difference in upholding dignity and respect. This confirmation allows us to concentrate our efforts on ensuring positive working conditions, healthy work environments, and fair treatment and non-discrimination, maximising our impact on the lives of individuals within our sphere of influence.

- **Training:** Globally, Roche achieved a high completion rate of 99.06% for our comprehensive eLearning program on human rights principles amongst our employees, indicating strong awareness and understanding of the issue. Our proactive rollout and monitoring of the Roche Behaviour in Business training for all engaged suppliers demonstrates our unwavering commitment to aligning our business partners with the highest ethical standards.
- **Speaking up:** Fostering an environment of trust where individuals can confidently voice concerns is a priority for Roche. Our global Roche SpeakUp channels are a key mechanism for this, available to all employees and stakeholders, including those within our Australian operations and value chain. Globally, 477 concerns were raised via these channels in 2024. In Australia, we ensure these channels are well-communicated and accessible. We are dedicated to maintaining a local culture where raising ethical concerns is supported, and all reports are taken seriously and addressed in line with our global standards. Roche Australia also has an Australian Whistleblower Policy that explains the protections available to persons who raise concerns under the Australian Whistleblower Protection laws contained in the *Corporations Act 2021* (Cth) and the *Taxation Administration Act 1953* (Cth).
- **Industry collaboration:** Our ongoing and active collaboration with peers and influential industry groups, including the PSCI, NGOs, government bodies, and international organisations, continues to be a driving force for positive change in the critical area of modern slavery. By working together, we are amplifying our collective impact and contributing to meaningful progress across the industry.
- **Transparent reporting:** Roche continued its commitment to transparency through consistent and comprehensive non-financial public reporting, including our annual Roche Sustainability Report. This ongoing open communication demonstrates our dedication to accountability and provides stakeholders with a clear view of our progress and achievements in upholding human rights and ethical practices.



## Looking ahead

Building on our strong foundation, Roche Australia will continue to implement and refine our strategy to combat modern slavery. We are committed to enhancing our monitoring and assessment frameworks, forging impactful alliances to drive positive change across the industry, and maintaining transparency on our progress. We are also committed to taking on a more involved and impactful role in our global initiatives.

Looking forward, Roche Australia will persist in assessing and critically reviewing our internal policies, supplier assessment protocols and due diligence processes in view of evolving legislative requirements and best practices.

We will also continue to look for opportunities to elevate our standards and address potential gaps. As a concrete example of our ongoing commitment to supplier due diligence, an audit of another key Australian supplier - our third party logistics provider is scheduled for 2025, utilising our established Supplier Sustainability Assurance Visit (SSAV) program. Beyond direct supplier engagement, Roche will also continue to cultivate and expand vital networks and initiatives, such as our Human Rights Compliance Community.







## 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.



# 1

## 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.

# 2

## What are Roche Australia's 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 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.

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 Australia has been a trusted provider of innovative healthcare solutions and in-vitro diagnostics.

In 2024, Roche Australia employed 618 dedicated individuals.

- [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, 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.

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 Roche Australia's supply chain?

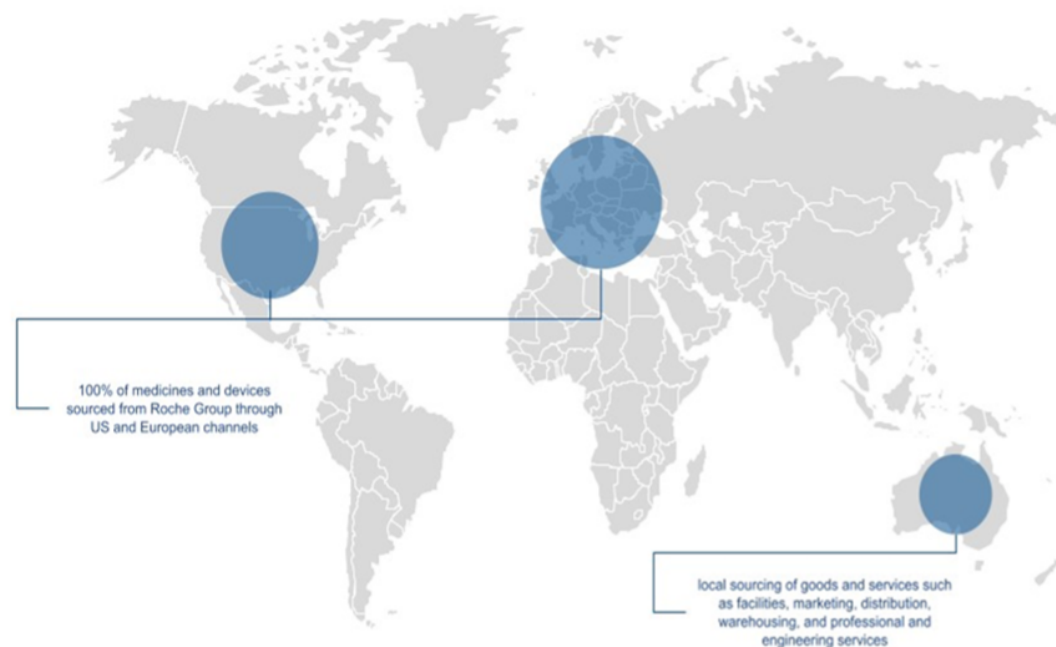
Modern slavery risks in supply chains are multifaceted and can appear at various levels of an organisation, including within its network of suppliers and partners. In a globalised world, business value chains often span across international borders, which brings challenges to ensuring workers' human rights.

At Roche Australia, upholding human rights is not just a principle – it's a fundamental commitment of our operations and extending throughout our value chain. Guided by our policies and a proactive risk management approach, we look to prevent, detect, and mitigate potential infringements of human rights. While we believe the inherent risks within our direct operations are low, we recognise the complexities of global sourcing. We understand that modern slavery risks can emerge, particularly within our diverse network of third-party providers and deeper supply chain tiers.

Risks are heightened by several factors, including the engagement of vulnerable worker groups (such as migrant, temporary, or low-skilled workers); operations in regions or sectors with weak legal protection, enforcement, or high corruption; the characteristics of labour-intensive industries with opaque recruitment or employment practices; and the complexities of multi-tiered supply chains that hinder direct visibility.

Consequently, Roche Australia's due diligence focuses on identified higher-risk sectors and activities. These key areas include, but are not limited to, manufacturing inputs and goods, covering the production of packaging, medical devices and components, active pharmaceutical ingredients (APIs) or key raw materials from third-party suppliers, and promotional items.

Outsourced services also receive significant attention; key areas within this category include logistics and warehousing (covering transport, storage and distribution); facilities management (such as cleaning, catering, security, and site maintenance, often involving third-party labour); and IT and digital services (including software development, digital platforms, and the supply chains for IT hardware and electronics). Clinical research operations represent a further critical focus, particularly services provided by third-party Contract Research Organisations (CROs) supporting clinical trials, with specific attention to their personnel's working conditions and participant rights.



Through targeted due diligence in these areas, examining for risks such as forced labour, child labour, debt bondage, and other exploitative conditions, Roche Australia actively works to identify, manage and mitigate modern slavery risks, fostering an ethical and transparent supply chain.



## 4

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

### Roche's global pledge in action

As set out in Roche's Position on Respecting Human Rights, our commitment to human rights is powerfully aligned with leading international standards. Roche fully embraces and implements the UN Human Rights Council's "Protect, Respect, Remedy" principles as championed in the [Ruggie Framework](#). As proud signatories of the [UN Global Compact Principles](#) and supporters of the [UN Sustainable Development Goals](#) within our business, our business strategy is guided by the timeless principles of the [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.

In 2024, the Roche Group successfully completed the UN Global Compact Business and Human Rights Accelerator programme. In accordance with the programme, Roche developed a value chain mapping, highlighting human rights focus areas across our operations and supply chain. These focus areas are pertinent to the Australian operations.

### Our blueprint for success

Roche supports and respects human rights as an integral part of its corporate strategy. This commitment is reflected in our internal policies and practices, including the [Roche Group Code of Conduct](#), [Roche Supplier Code of Conduct](#), [Roche Directive on Integrity in Business](#), and the [Roche Group Policy on Safety, Security, Health and Environmental Protection \(SHE\)](#). These policies and practices are implemented across the Roche Group including by Roche Australia.

Through Roche's human rights risk assessment (detailed below), we've strategically identified key areas where we can make the most significant impact in upholding dignity and respect. Within our own operations, our focus includes ensuring universal access to healthcare, and fostering a fair and safe work environment for every individual. Extending this commitment across our value chain, we are dedicated to ensuring positive working conditions, healthy work environments, and fair treatment and non-discrimination for all. This focused approach empowers us to build a truly ethical and responsible ecosystem. Our Compliance Officers at Roche Australia play a pivotal role in ensuring these principles are applied consistently, reinforcing responsible business practices globally.

Roche Australia is committed to upholding our employees' 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 employees can thrive. At every Roche Australia site, People & Culture contacts support the enforcement of non-discrimination and harassment policies as outlined in the [Roche Group Employment Policy](#), contributing to a respectful work culture.

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. This includes a comprehensive eLearning program on human rights principles for all employees, which achieved a global completion rate of 99.06% in 2024, alongside local and global initiatives to reinforce awareness.

### Driving positive change together

Roche Australia regularly collaborates with peers and industry groups such as the PSCI (of which Roche is a founding member), NGOs, government bodies and international organisations to gain invaluable insights into critical challenges, empowering us to act decisively and create meaningful positive change in the lives of people globally.

[Transparent communication](#) about human rights is essential to Roche Australia. 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

#### *Supplier Code of Conduct*

Roche holds our suppliers to stringent human rights standards consistent with our values and principles. These are defined in our [Supplier Code of Conduct](#), which is a comprehensive document that sets forth ethical behaviour, human rights protection, and safe working conditions. It requires suppliers to manage human rights risks proactively, not only within their operations but also across their own supply networks.

### ***Contractual obligations***

The [Supplier Code of Conduct](#) is mandatory for all suppliers and business partners and is an integral part of every contract and supplier engagement. Our supplier agreements explicitly require a commitment to upholding anti-slavery laws and respecting human rights and embed the principles of the PSCI.

### ***Due diligence and risk assessment practices***

All potential and current suppliers and business partners are required to undergo a stringent vetting process that is guided by international standards and focused on risk identification and mitigation. The systematic approach ensures traceability throughout our supply chain.

A [formal methodology](#) is implemented and includes using industry-standard questionnaires and undertaking risk-based actions to address any identified issues. 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.

Roche's commitment to responsible sourcing extends beyond initial engagement. Through Roche's Business Partner Management framework, Roche is able to manage and monitor risks and opportunities through continuous dialogue with our business partners to ensure that our business relationships are sustainable and compliant with Roche standards.

Driven by a commitment to ethical practices and continuous improvement, Roche proactively refines its due diligence process. In 2024, the Roche Group developed an internal Roche Human Rights Due Diligence Practical Guide that gives Roche employees a comprehensive overview of our risk assessment and due diligence framework.

Locally, during 2024, Roche Australia further enhanced our third-party vendor due diligence questionnaire. A key driver for this was to address feedback and a common misconception observed among some sole trader suppliers, who occasionally indicated a belief that modern slavery risks were not applicable to their individual operations.

To clarify their obligations and enhance risk identification across all supplier types, we introduced a new, dedicated section (or 'tab') within the questionnaire. This section is specifically aimed at educating and engaging Roche Australia's suppliers, with tailored guidance so that our suppliers understand their role in preventing modern slavery.

This new section includes:

- explicit guidance for all suppliers, especially sole traders, explaining that modern slavery risks can be present in any business context, regardless of its size or structure, particularly through their own supply chains and interactions with other contractors or entities;
- specific questions directed at all service providers (including sole traders) concerning the systems and processes they have in place to identify, investigate, prevent, remedy, and monitor the risk of modern slavery within their organisation and their broader downstream operations. Suppliers are also requested to provide copies of relevant policies, procedures, or any Modern Slavery Statements they are required to make; and
- inquires about measures taken to train and make their employees or any engaged workers aware of modern slavery risks, including the nature and frequency of such awareness initiatives.

This targeted enhancement, addressing common queries and providing educational material alongside pointed questions, is designed to assist Roche Australia's suppliers to better understand their responsibilities under the Modern Slavery Act. It also strengthens our ability to assess and manage these critical risks across our supplier base.

### ***Empowering our partners***

Roche Australia provides all engaged suppliers with access to a dedicated training portal, where Roche Behaviour in Business training equips our business partners with the knowledge and tools needed to build a truly ethical supply chain. Completion of the training as well as ongoing awareness programs conducted by Roche are considered cornerstone initiatives of our collaborative commitment to upholding ethical standards.

### ***Fostering a Speak-Up Culture for Human Rights and Integrity***

Roche is dedicated to fostering a speak-up culture where all employees and external stakeholders feel empowered and safe to report concerns regarding unethical conduct. This explicitly includes any suspected instances of modern slavery within our own operations or our supply chains. We maintain multiple secure and accessible reporting channels, notably our confidential, externally hosted [SpeakUp line](#), which is available 24/7 in multiple languages. In 2024, these channels were utilised by 424 employees and 53 externals to raise various concerns at a global level.

Roche Australia also has an Australian Whistleblower Policy that explains the protections available to persons who raise concerns under the Australian Whistleblower Protection laws contained in the *Corporations Act 2021* (Cth) and the *Taxation Administration Act 1953* (Cth).



In addition, allegations of human rights violations or modern slavery risks, particularly those concerning our supply chain, can be reported to Roche's local or regional Compliance Officers. Such risks may also be identified through our Global Procurement Department's ongoing due diligence activities. All reports are managed and documented through our Business Ethics Incident Management System, with oversight from the Chief Compliance Officer.

Every concern raised is treated with seriousness and impartiality. We adhere to documented procedures to progress investigations as appropriate by qualified personnel. Where misconduct or violations are substantiated, appropriate remedial actions are implemented, which may include, by way of example, supplier disengagement, policy changes, or support for affected individuals. Roche maintains a strict policy of non-retaliation, protecting anyone who reports a concern in good faith from any adverse consequences.

## 5

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

Roche has established a framework to evaluate the effectiveness of our actions against modern slavery. Insights from these assessment methods are used to refine our policies and practices, underlining our commitment to ongoing progress.

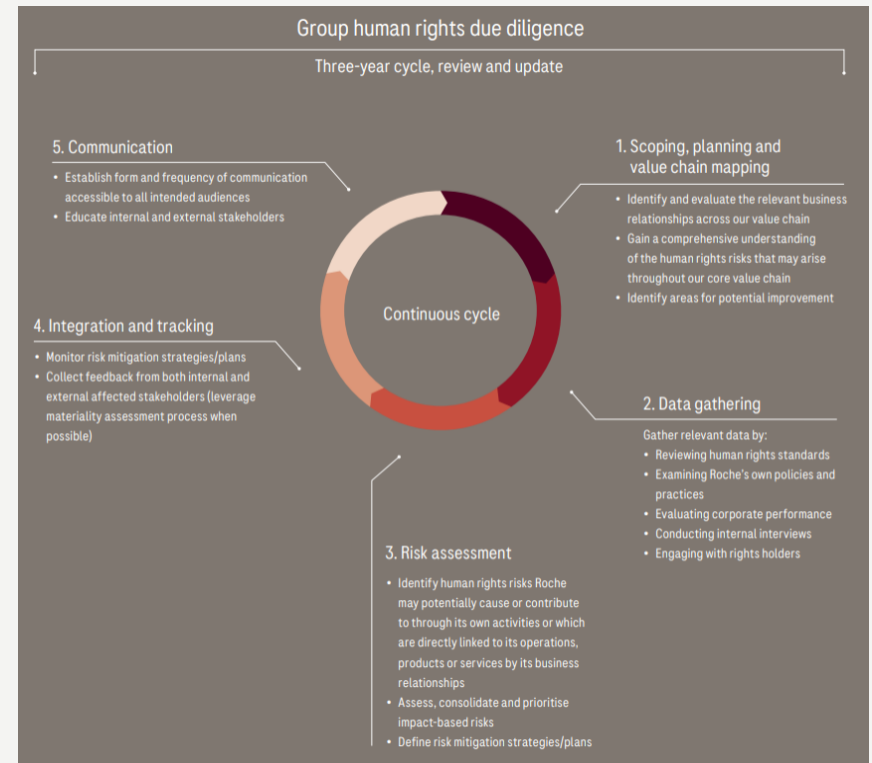
### Continuous human rights risk management approach

The Roche Group conducts a human rights risk assessment of our own and third-party operations every three years with a yearly review. This risk management approach is a continuous cycle designed to identify, assess, mitigate and manage the risk of human rights violations across our operations and supply chain.

Mechanisms are in place to allow Roche employees and business partners to raise concerns – initiating and implementing corrective and remedial measures if needed.

Roche believes that trust is earned through transparency. That's why we maintain supportive documentation of our due diligence processes.

Key performance indicators (KPIs) are carefully selected and monitored, providing clear metrics on the impact of our initiatives, such as audit frequency, compliance rates, and issue resolution. We record and report these key KPIs and relevant, legally binding human rights-related activities, ensuring open communication and unwavering accountability with all our stakeholders. We also keep documented records of the third party due diligences that we have completed.



[Source: Roche Annual Report 2024 \(page 141\)](#)

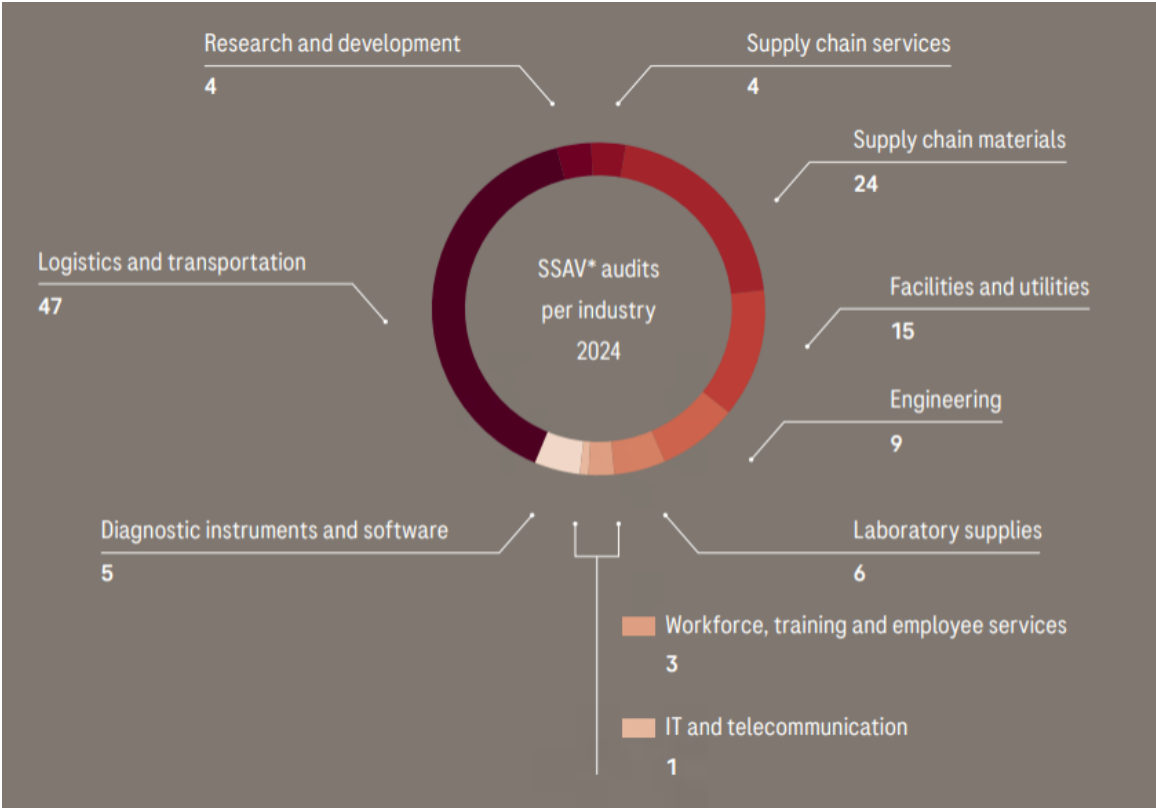
Collaborative supplier sustainability audits and reviews

Roche has a formal annual process for assessing suppliers to identify those at higher risk for human rights violations. An automated risk assessment methodology that allows for traceability in the supply chain is utilised and includes an external perspective with risk assessment depending on four main externally available and recognised indexes: KidsRights Index, Global Slavery Index, OECD Index and Global Rights Index. Criteria used include the industry, location, affiliations/associations and violations of the supplier.

All high-risk and significant partners are subject to formal audits under Roche’s PSCI-based Supplier Sustainability Assurance Visit (SSAV) program. Key characteristics of the SSAV include an annual audit plan that is communicated to all relevant internal stakeholders, use of PSCI-approved independent auditors, documented audit reports and action plans, follow-up audits to ensure adequacy of action plans and continuous improvement, public disclosure of programme KPIs and sub-tier supplier oversight.

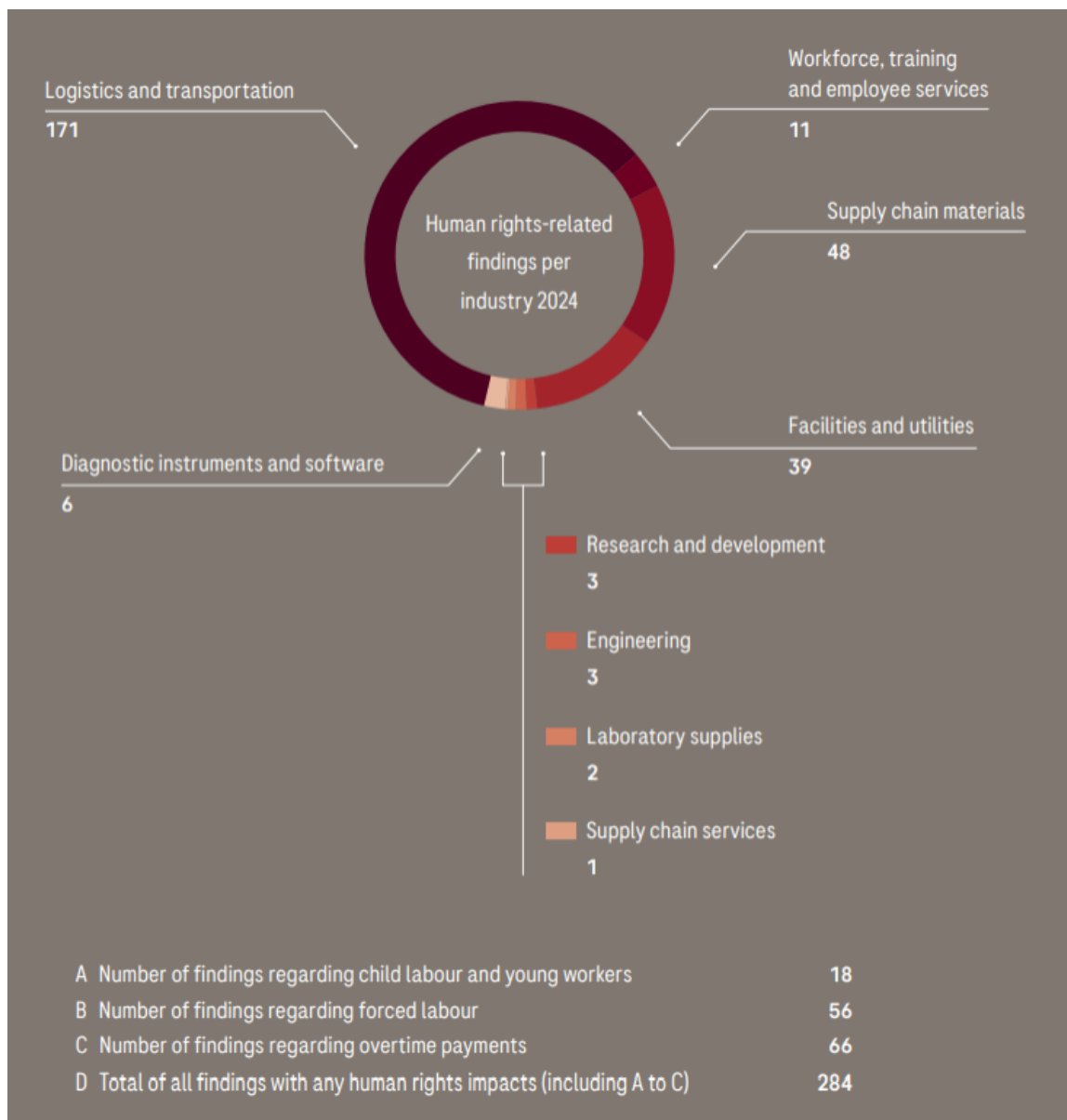
These regular, risk-based audits and supplier performance reviews allow us to continuously work hand-in-hand with our suppliers to ensure our standards of sustainability and ethics are upheld throughout our partnership. For those suppliers who do not meet our expectations, a mitigation plan is put in place which, in the event of non-compliance, may lead to disqualification and relationship termination.

In 2024, as a result of the SSAV program, 118 sustainability audits were conducted, 38 of which were triggered by high human rights risk, leading to 66 sustainability audits with human rights and labour findings and a total of 284 findings with any human rights impacts. 8 agreements with business partners were terminated on the grounds of unethical behaviour.



Source: Roche Annual Report 2024 (page 145)





Source: Roche Annual Report 2024 (page 146)

## Open and transparent reporting on our progress

We maintain transparency through non-financial [public reporting](#) on our actions and outcomes, including through our annual Roche Sustainability Report. These reports provide a thorough account of our strategy and progress towards our goals and commitments, including our suppliers' conduct and our endeavours towards positive societal impact, allowing for external evaluation of our performance.

## Setting the benchmark for a sustainable future

Roche actively measures its progress against the world's leading benchmarks. Our regular participation and exceptional performance in the Dow Jones Sustainability Indices (DJSI), which meticulously evaluates and tracks the sustainability performance of companies, focusing on environmental, social and governance factors, underscore this commitment. In 2024, Roche maintained its leading ranking as one of the most sustainable healthcare companies for the 16th consecutive year in the DJSI. This valuable benchmarking allows Roche to track its adherence to best practices and drives ongoing enhancement of our efforts.

## Future focus

At Roche Australia, we seek ways to improve our human rights risk management process in order to reduce harm and make impactful, positive contributions to society. In 2024, Roche launched its Human Rights Compliance Community, a network of compliance experts from across Roche that works to enhance understanding and build internal expertise on human rights, ensure compliance with regulations and guidelines, and promote a unified approach to improving human rights throughout Roche.

Roche Australia will continue developing networks and initiatives such as this that support our work to ensure human rights are respected and supported across Roche. We are also committed to taking on a more involved and impactful role in our global initiatives.

## 6

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

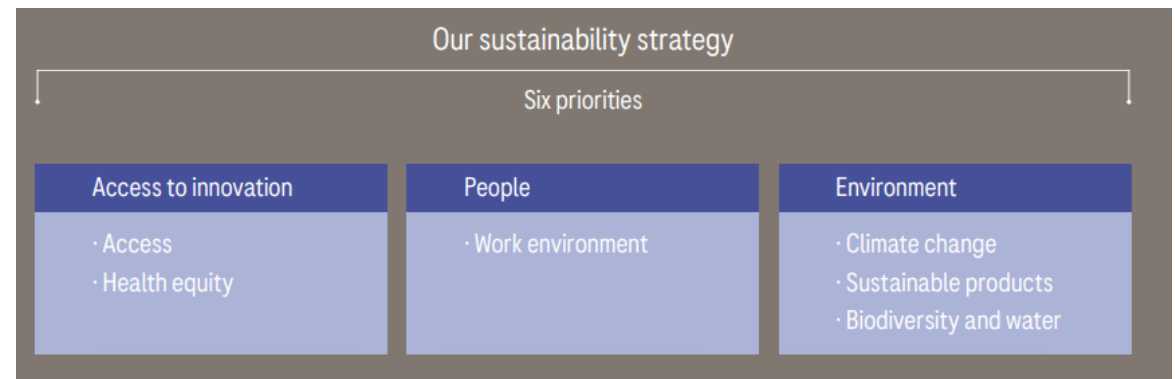
In preparing this joint Modern Slavery Statement, we confirm that Mandatory Criterion Six, requiring the description of the consultation process with owned or controlled entities, does not apply to Roche Australia. Neither of the reporting entities named in this statement owns or controls any other entities, thus exempting us from this requirement. We have focused our consultation on addressing modern slavery risks collaboratively across our operations and supply chains.

## 7

### Any other relevant information

Roche Australia provides further details of the efforts that Roche is making at the Group level to reduce modern slavery and the impact of our wider corporate activities in this critical area.

- *Driving a sustainable future - embedding our commitment at the heart of our strategy:* In 2024, Roche further embedded sustainability into our updated corporate strategy by setting a clear focus on six key priority areas where we can make the most significant impact.



Source: [Roche Annual Report 2024 \(page 25\)](#)

- *Roche's vision for universal health coverage:* With rising geopolitical tensions and conflicts exacerbating inequalities around the world, Roche continues its major focus on [universal health coverage](#), ensuring accessibility of our transformative medicines and diagnostics. Through our Global Access Program, 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. Our goal is to improve global healthcare access, thereby diminishing the vulnerabilities that can result in exploitation.
- *Investment in our ethical framework for the future:* Since 2021, Roche has strategically embedded compliance risk and opportunity assessment and management through its global directive. Building on this strong foundation, 2024 saw a step forward with the creation of a dedicated role within our Group Compliance team focusing on improving our process for managing risk and opportunities, including in the areas of ethical business practices and respect for human rights. This focused investment will empower us to proactively manage risks and leverage opportunities, reinforcing our oversight and assurance in these vital areas.





### 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 17 June 2025 and for Roche Diagnostics Australia Pty Limited through the Board of Directors on 19 June 2025.

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:

*Nic Horridge*

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