



## Roche UK's Modern Slavery Statement

This statement has been published in accordance with the Modern Slavery Act 2015. It provides an update on the progress that Roche Products Limited, Roche Diagnostics Limited and Roche Diabetes Care Limited have made during the financial year ending 31 December 2018, and will continue to make, to prevent modern slavery in their businesses and supply chains. Unless otherwise specified, all references to Roche herein are references to the Roche UK entities and Roche globally.

### Introduction to Roche

F Hoffmann-La Roche Limited was founded in Switzerland in 1896 and has had a presence in the United Kingdom since 1908. Headquartered in Basel, Switzerland Roche now operates in over 100 countries with over 91,000 employees around the world.

Roche plays a significant role in not only driving medical advancement but also in offering a broad and innovative portfolio of products to patients, physicians, researchers, hospitals and laboratories.

At Roche we are committed to meeting high ethical standards and complying with all applicable local, national and international laws wherever we do business. Ethical behaviour in business is essential to creating and maintaining a healthy and just environment for all. For that reason, we maintain rigorous internal processes to ensure that our employees adhere to the laws, regulations and industry codes of conduct that support good business practices.

### Modern Slavery

Roche fully endorses the Modern Slavery Act 2015 in order to eliminate all forms of human slavery, human trafficking and forced labour ("Modern Slavery"). Roche acknowledges the importance of companies working together to tackle such issues in our society and around the world. Roche condemns all forms of Modern Slavery including child, forced or compulsory labour. It is acknowledged by Roche and its staff that we all have a responsibility to be aware of Modern Slavery. Employees and business partners are requested to speak up and report incidents if they believe that someone has done, is doing, or may be about to do something that violates this principle.

## **Policies and contractual controls**

Roche supports and respects human rights and has implemented the “Protect, Respect, Remedy” approach from the [UN Human Rights Council’s Ruggie Framework](#). We are equally committed to complying with the 10 UN Global Compact Principles; the Universal Declaration of Human Rights; and the Fundamental Labour Rights stipulated by the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work. This commitment is embodied in our [Roche Group Code of Conduct](#), [Roche Corporate Principles](#), the [Roche Group Employment Policy](#), the [Roche Supplier Code of Conduct](#) as well as in our [Roche Position on Respecting Human Rights](#).

Roche requires its business partners to comply with all applicable laws, regulations, industry codes and contractual terms as well as with generally accepted sustainability standards.

All transactions by Roche with third parties are made on the basis of quality, availability, service, suitability, sustainability and integrity. Roche remains committed to these principals and requires its suppliers to acknowledge and adhere to the principals embodied in its Supplier Code of Conduct and to ensure that their own suppliers will also comply with these principals.

The Roche Supplier Code of Conduct comprises the principles of the Pharmaceutical Supply Chain Initiative (PSCI):

- Ethics: Suppliers shall conduct their business in an ethical manner and act with integrity.
- Labour: Suppliers shall be committed to uphold the human rights of workers and to treat them with dignity and respect.
- Health and Safety: Suppliers shall provide a safe and healthy working environment, including for any company-provided living quarters.
- Environment: Suppliers shall operate in an environmentally responsible and efficient manner, and they shall minimise adverse impacts on the environment.
- Management Systems: Suppliers shall use management systems to facilitate continual improvement and compliance with the expectations of these principals.

Roche also has in place Compliance Officers in each country for issues relating to the implementation of and the compliance with the Roche Group Code of Conduct.

## **Due Diligence of suppliers in the Roche UK supply chain**

At Roche we understand that there is a potential exposure to Modern Slavery when we are purchasing goods and services from third parties. We continue to focus on the topic of Modern Slavery within our UK business operations, including reviewing the ethics of the suppliers that we work with and ensuring that their ethics and approach to Modern Slavery is included as part of our pre-engagement due diligence. Each Roche UK entity has continued with its own due diligence of its supply chain and, where appropriate, requested information from existing suppliers regarding their businesses, their position on the Modern Slavery Act 2015 and how they intend to eliminate Modern Slavery within their business and their own supply chains.

## **Assessment of Modern Slavery Risk**

We have mapped our supply chains to assess particular industry/sector and geographical risk. These assessments cover the entire scope of our UK businesses.

Where suppliers operating in potentially higher risk areas have been identified, we have obtained copies of their policies and/or position relating to Modern Slavery. In some instances we require suppliers to enter into additional contractual arrangements to ensure that the services provided to Roche meet the requirements and standards expected from Roche in the UK.

We continue to remind our key suppliers of the Roche Supplier Code of Conduct and of our expectations in relation to adherence with all ethical standards expected of Roche suppliers on a continuous basis regardless of the area they operate in to assist us in tackling the issue of Modern Slavery.

## **Modern Slavery Training**

All employees at Roche are trained on the Roche Code of Conduct which covers topics such as Modern Slavery. The Modern Slavery training programme that we developed in 2016 has been delivered across our UK businesses and incorporated into our induction programmes for new employees. We also continue to provide additional training to selected key staff in Modern Slavery. In addition, each Roche UK entity has documented its internal operating procedure clarifying its employees’ responsibilities for compliance with the Modern Slavery Act 2015.

## **Further steps taken by Roche globally to prevent Modern Slavery in our supply chains**

Following on from our work in 2017, we continue to focus on our supplier sustainability by benchmarking, increasing awareness, enhancing our legal framework, ensuring that communications are transparent, assessing risks, fostering due diligence and collaborating on collective actions.

Roche uses a risk based approach, including assessment of human rights and Modern Slavery related risks, to identify the highest risk suppliers and service providers in all spend categories and across all countries and industries. We then carry out audits of these suppliers using a protocol that covers all aspects of human rights, including Modern Slavery.

Roche agrees corrective action plans with suppliers and service providers to address audit findings and provides support with the implementation of such plans. We carry out follow-up audits to verify the level of the supplier's implementation of these corrective actions. Roche continues to collaborate on supplier audits with other pharmaceutical companies under the umbrella of the Pharmaceutical Supply Chain Initiative (PSCI) using a unified joint audit protocol.

In 2018 our Group Legal Compliance and Group Risk Advisory functions undertook a global cross-functional human rights risk assessment to identify and assess potential risks of human rights violations. Roche and the Modern Slavery Act. A cross-divisional working group has established a checklist on Due Diligence for External Business Partners, mainly focusing on agents and distributors. It includes guidance regarding risk assessments, including a Human Rights Assessment and Implementation Framework.

Roche will continue to update its policies and procedures, raise awareness on this important topic and look at how it can address the issue of Modern Slavery within its business and supply chain. We will continue to work at maintaining appropriate safeguards against any mistreatment of persons involved in our supply chain or own business.

This statement has been approved by the General Managers of Roche Products Limited, Roche Diagnostics Limited and Roche Diabetes Care Limited.



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