

Roche UK's Modern Slavery Statement

This statement is published in accordance with Section 54 of the Modern Slavery Act 2015. It outlines the progress made by Roche Products Limited, Roche Diagnostics Limited, and LumiraDx UK Limited (collectively "Roche UK") in preventing modern slavery and human trafficking within our business and global supply chains during the financial year ending 31 December 2025. Unless stated otherwise, all references to Roche pertain to the Roche UK entities and Roche globally.

Introduction to Roche

F Hoffmann-La Roche Limited in 1896 and headquartered in Basel, Switzerland, Roche operates in over 100 countries with more than 91,000 employees. Our supply chain involves over 60,000 global suppliers.

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 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](#). These policies clearly define our expectation for business behaviours.

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 principles and requires its suppliers to acknowledge and adhere to the principles embodied in its Supplier Code of Conduct and to ensure that their own suppliers will also comply with these principles. 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.
- Human Rights and Labour: Suppliers shall be committed to upholding the human rights of workers and 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 principles.

Roche also has Compliance Officers in each country for issues relating to the implementation of and 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.

To assist us in tackling the issue of Modern Slavery, we continue to remind our key suppliers of the Roche Supplier Code of Conduct and of our expectations in relation to adherence to all ethical standards expected of Roche suppliers, regardless of the area in which they operate.

Modern Slavery Training

All employees at Roche are trained on the Roche Group Code of Conduct which covers topics such as Modern Slavery.

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

As a signatory of the UN Global Compact (UNGC) we commit to integrate the universal principles in the areas of human rights, labour, environment and anti-corruption into our business strategy, culture and daily operations and to report on the results achieved each year.

Roche's commitment to human rights is reflected in the stringent requirements we place on ourselves and on our more than 60,000 suppliers worldwide. We regard our suppliers and service providers as partners, and put our efforts into creating a relationship of mutual trust and collaboration in order to ensure that our standards are met. Beyond our 60,000 direct suppliers, we have initiated a mapping project for our Secondary Value Chain, specifically focusing on indirect services like logistics and site facilities where labor risks are inherently higher.

One important element of these relationships is our Supplier Sustainability Assurance Visit programme (SSAV), which gives us the ability to positively impact labour conditions at our suppliers' facilities. The Roche Supplier Code of Conduct binds our suppliers to adhere to clearly stated performance expectations, including performance on human rights, and allows Roche to conduct SSAVs to help ensure compliance through collaboration and capability building. All our suppliers are evaluated annually through a standardised, risk-based process to identify those at high risk for human rights violations against vulnerable populations (children, underage workers, migrants, local underprivileged communities and people with low levels of education). Suppliers determined to be at high risk are included in the SSAV programme.

Looking to the future, it is essential for us to constantly develop and expand our human rights requirements and guidelines in order to ensure we continue to meet the highest possible standards. In 2021, we updated our methodology to address industry sectors that were not previously considered, as well as non-Organisation for Economic Co-operation and

Development (OECD) countries where performance standards may be lower, and human rights risks associated with certain commodities. To ensure we are properly addressing the issue of child labour, we also integrated the UNICEF Children's Rights in the Workplace Index in our methodology for identifying high risk suppliers for inclusion into our SSAV programme.

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.

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 our own business.

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

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