



# Fighting Against Forced Labour and Child Labour in Supply Chains

Hoffmann-La Roche Limited

A Canadian Corporation, No. 119448785RC0004

Report for the period January 1 to December 31, 2024

## **Preparation of this report**

This report was created *pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act* and provides an overview of the steps taken by Hoffmann-La Roche Limited (“Roche”) during the year ending 31 December 2024 to prevent and reduce the risk that forced labour or child labour is used at any step of our supply chain.

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## Steps taken in the preceding year to prevent or reduce forced or child labour in the supply chain

Roche fosters human rights globally, both in our own operations and across our value chain. We are evolving our holistic approach in the value chain towards a proactive approach in improving human rights by committing to doing no harm and making an impactful positive contribution to society.

As part of our commitment to sustainability, we are continuously making impactful and positive contributions in areas that are within our sphere of influence.

Over the last year, Roche took numerous steps to prevent and reduce forced or child labour in its supply chain. In 2024, Roche:

- Continued to implement our robust and comprehensive compliance program, which includes supply chain-specific measures;
- Reviewed and reconfirmed our 2023 global human rights risk assessment, with a focus on our own operations and on supply chain;
- Conducted audits of Roche's business partners in the areas assessed as having the most human rights risk in its operations, and imposed corrective action plans as necessary to remediate adverse findings;
- Operated reporting mechanisms for employees, external business partners, and members of the general public who believe that a human rights violation has occurred;
- Required mandatory training for all Roche employees on policies and processes that speak to human rights, compliance management, and business partner due diligence.

## Structure, Activities and Supply Chain

From its inception, Roche has developed diagnostics and medicines for a wide range of chronic and life-threatening health conditions that continue to revolutionize healthcare. Being a family-owned company allows us to focus on long-lasting investments, take greater risks and explore innovative new ways to improve people's health around the world.

**As a global leader in healthcare, we are one of the world's largest biotech companies and a leading supplier of in-vitro diagnostics. We're an innovator across major disease areas, including oncology, neurology, infectious diseases, and ophthalmology. We've partnered with many forward-thinking, entrepreneurial and groundbreaking organizations that have one thing in common – the belief that cutting-edge science and technology can and will improve human health.**

**Roche's operations span the globe, with 23 manufacturing sites worldwide including in Switzerland, the United States, Germany, China, and Japan.**

## FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS

Roche has roughly 2,000 employees in Canada, and distributes and sells Roche assays, diagnostic equipment, and other health care products to customers in the Canadian healthcare market. In 2024, 236,766 Canadians were treated with Roche medicines, 1 in 4 Canadians were tested with a Roche diagnostic product, and there were 143 active Roche clinical trials in Canada.

## Policies and Due Diligence Processes

The Roche Group Code of Conduct clearly expresses Roche's expectations as an employer relating to ethical business practices and protection of human rights and provides our employees with practical guidance, examples and references to further useful information.

To ensure our high ethical standards are upheld, Roche relies on a robust and comprehensive compliance management program. The compliance program encompasses key areas such as robust compliance training and communication, risk and opportunity management, anti-corruption policy, due diligence for business partners and suppliers, and systems for identifying, reporting and investigating compliance issues, while ensuring whistleblowers are protected against retaliation.

**Embedding our strong ethics culture into everything we do remains the main focus of our compliance program. We know that our success in this area depends on how comprehensive and accessible the compliance program is to all our employees.**

In 2024, Roche developed an internal Roche Human Rights Due Diligence Practical Guide that gives Roche employees a comprehensive overview of our risk assessment and due diligence processes at a Group level.

Roche is fully committed to supporting and respecting human rights. Roche acknowledges both the United Nations Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance for Responsible Business, and recognises and follows the international standard ISO 26000 guidance on social responsibility. Roche also adheres to the fundamental conventions of the International Labour Organization (ILO): elimination of forced and compulsory labour (Conventions 29 and 105), abolition of child labour (Conventions 138 and 182), elimination of discrimination in respect of employment and occupation (Conventions 100 and 111), freedom of association and collective bargaining (Conventions 87 and 98).

Roche's commitment to human rights is also embodied in the Roche Group Employment Policy, the Roche Position on Respecting Human Rights and the Roche Directive on Human Rights Due Diligence for Business Partners.

## FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS

In 2024, Roche employees also successfully completed the UN Global Compact Business and Human Rights Accelerator programme. This programme encourages companies participating in the UN Global Compact to establish a risk management mechanism and enhance ongoing due diligence processes. We have developed a value chain mapping, highlighting human rights focus areas across our own operations and supply chain. Roche completed the programme in 2024 as part of its continuous efforts to improve its human rights due diligence approach, working to further embed a systematic process across the business and building internal capacity while preparing for upcoming legislation.

We require our suppliers to explicitly acknowledge and adhere to the principles embodied in the Supplier Code of Conduct. Suppliers must ensure that their own suppliers appropriately ensure compliance with these principles along their own supply chains. Suppliers must also ensure that Roche can verify compliance with the Supplier Code of Conduct through audits or surveys. Suppliers that fail to meet Roche's expectations on the topics outlined in the Roche Supplier Code of Conduct might be disqualified from inclusion in Roche's supplier portfolio and consequently excluded from it.

**Roche is also a member of the Pharmaceutical Supply Chain Initiative, a collaboration of more than 80 pharmaceutical companies and suppliers with a shared vision to establish and promote responsible business practices that continuously improve human rights, ethics, labour, health, safety, and environmentally sustainable outcomes for pharmaceutical supply chains.**

## Areas of risk and steps to assess and manage that risk

In a globalised world, business value chains often span across international borders, giving millions of people an opportunity to participate in the global economy, however this also brings challenges to ensuring workers' human rights. As part of Roche's global operations with 100,000+ employees and thousands of business partners, we are at risk of being involved with negative human rights impacts.

Roche has a formal process and methodology for assessing our suppliers in order to identify those at higher risk for human rights violations due to:

- Being associated with an industry that is likely to employ vulnerable populations;
- Being located in a region at higher risk for human rights violations, per respected human rights indices;
- Being associated with government, media or internal reports of alleged behavior or operations that indicate real or potential noncompliance with the Roche Supplier Code of Conduct

This Human Rights risk assessment is embedded in our standardized due diligence process conducted before engaging new suppliers. It is used to identify suppliers for inclusion in our Supplier Sustainability Assurance Visit (SSAV) program, through which we directly evaluate supplier human rights compliance.

## FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS

For more information regarding Roche's SSAV process, see Roche's Procurement Risk Management website.

Roche conducts a human rights risk assessment for our own operations and third-party operations every three years, with a yearly review. In 2023, we conducted such an assessment. For our supply chain, working conditions, fair treatment and non-discrimination and a healthy work environment were identified as focus areas. These areas were reviewed and reconfirmed in 2024.

### Measures to remediate forced or child labour

In 2024, Roche conducted 118 sustainability audits (SSAVs) during which we identified 284 human rights related findings. The findings included excessive overtime, incorrect overtime compensation, improper maintenance of HR and payroll documentation, delayed or improper payment calculation of wages, and inadequate maintenance of employee time records. Each of the audited suppliers was required to establish and make progress on a formal corrective action plan.

In 2024, 20 substantiated incidents related to human rights violations triggered terminations of contracts. All of the incidents were related to discrimination and harassment, 18 involving Roche employees and 2 a contractor. None of the incidents involved a business partner.

Roche maintains various mechanisms for reporting compliance incidents. The external Roche Group speak up channel is available for everyone who is not a Roche employee or contractor. Roche employees can use the Roche Group Code of Conduct Help & Advice Line in case of compliance questions or uncertainties, or the Roche Group speak up channel to report in good faith a suspected violation of the Code of Conduct or a workplace incident. The speak up channel operates in 103 countries and 53 languages, making it available worldwide.

### Measures to remediate loss of income resulting from measures to eliminate forced or child labour

In 2024, Roche did not identify any loss of income to vulnerable families resulting from our measures to eliminate the use of forced or child labour in our supply chains.

### Training provided to employees on forced labour and child labour

All Roche employees complete mandatory training on the Roche Group Code of Conduct and Roche Directive on Behaviour in Business, which address Roche policies and processes regarding Roche's commitment to human rights, compliance management, and business partner due diligence. Roche is presently preparing a dedicated training on human rights.

## FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS

In order to facilitate compliance with Roche's Supplier Code of Conduct, Roche additionally makes training on the code available to its suppliers.

### How effectiveness of ensuring that forced and child labour are not being used is assessed

Roche employs various measures to ensure that forced and child labour are not being used.

These include:

- Regular reviews of the organization's policies and procedures relating to human rights, including forced labour and child labour;
- Tracking relevant performance indicators; and
- Working with suppliers to measure the effectiveness of their actions to address forced and child labour.

### Further resources

For more information regarding Roche's continuing efforts to uphold human rights in its operations, please see:

[Human rights](#)

[Human rights in the value chain](#)

[Position on Respecting Human Rights](#)

[Roche Directive on human rights due diligence for business partners](#)

[Roche Group Annual Report 2024](#)

[Roche Group Code of Conduct](#)

[Roche Group Employment Policy](#)

[Supplier Code of Conduct](#)

[Behaviour in Business](#)

## Approval

This report was approved pursuant to paragraph 11(4)(a) of the Act. In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate, and complete in all material respects for the purpose of the Act, for the reporting year listed within this report.

### Brigitte Nolet

General Manager  
Roche Pharma Canada

DocuSigned by:

*Brigitte Nolet*

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2025-May-28

I have the authority to bind Hoffmann-La Roche Limited

### Matheus Vieira

General Manager  
Roche Diagnostics Canada

DocuSigned by:

*Matheus Vieira*

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2025-May-29

I have the authority to bind Hoffmann-La Roche Limited

