



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, 2025

Preparation of this report

This report was created *pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”)* and provides an overview of the steps taken by Hoffmann-La Roche Limited (“Roche”) during the year ending 31 December 2025 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 2025, 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;
- Upheld ethical and responsible business conduct through the Roche Group Code of Conduct, reinforcing integrity, compliance, human rights, and sustainability while providing mechanisms for employees and partners to raise concerns without fear of adverse consequences; and;
- 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.

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 2025, more than 236,000 Canadians were treated with Roche medicines, 1 in 4 Canadians were tested with a Roche diagnostic product, and there were 141 active Roche clinical trials in Canada..

Policies and Due Diligence Processes

The Roche Group Code of Conduct defines our standards for ethical and responsible business conduct across the company. It sets clear expectations for employee behaviour and establishes how we operate with integrity, comply with laws and regulations and uphold high ethical standards.

At Roche, integrity and ethical conduct form the foundation of our corporate culture. Upholding high standards of business ethics across our value chain is essential to maintaining trust and sustainable performance. We achieve this through a comprehensive compliance management programme that includes training, risk management, anti-corruption policies, due diligence, and systems for reporting and investigating issues, all while protecting individuals who report concerns in good faith. The effectiveness of our compliance management depends on how accessible and embedded it is across the organisation, so we continue to integrate our culture of integrity into daily operations and decision-making.

The Roche Directive on Human Rights Due Diligence for Business Partners establishes the framework to protect human rights across the Group value chain. It applies to Roche Group employees, contractors, external workers and business partners engaging with us along the value chain. The policy covers both upstream activities (direct materials, products and indirect goods and services) and downstream activities (distribution of products and services).

It sets out principles for human rights due diligence, including identification and assessment of high-risk operations, stakeholder engagement to understand potential concerns, and the design of effective responses. It integrates human rights risk management into the Group due diligence processes and establishes ownership and accountability for implementation.

Roche adheres to applicable sustainability related laws and regulations and is fully committed to supporting and respecting human rights. Roche acknowledges both the United Nations Guiding Principles on Business and Human Rights (UNGPs) ('Ruggie Framework') 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), and freedom of association and collective bargaining (Conventions 87 and 98).

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

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 globalized 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

Roche selects its counterparties for acquisitions and divestments carefully from a general compliance and reputational perspective which includes but is not limited to Human Rights. Roche applies industry standard due diligence questionnaires to address health, safety & environment and employment related questions among a wide array of further matters which may relate to Human Rights. Depending on the counterparties, further risk based due diligence actions may be undertaken to ensure that issues such as human right violations, are detected and addressed.

We are committed to continuously improving human rights practices through our policies, processes, risk management and mitigation. We monitor, investigate and address any deviations from our human rights commitments and collaborate with business partners to prevent misconduct. We apply internal policies and a systematic risk management process for child labour and broader human rights violations across our operations and supply chain, evaluating risks like health and safety and adequate wages.

Roche conducts Group human rights risk assessments every three years with annual reviews. These assessments identify and evaluate potential negative human rights impacts arising from our activities and business relationships, which allows us to prioritize risks according to their potential impact and develop tailored mitigation strategies.

Measures to remediate forced or child labour

In 2025, Roche conducted 109 sustainability audits (SSAVs) during which we identified 221 human rights related findings. The findings related to a lack of assurance regarding voluntary overtime, and systemic administrative gaps were observed, as several facilities lacked codified policies or statements of commitment regarding labor practices. Regarding child and young worker labor, 2025 audits found no active violations. Findings in this domain were exclusively administrative, stemming from inadequate

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policy documentation and insufficient follow-through on prior corrective actions. Each of the suppliers where findings were identified, was required to establish and make progress on a formal corrective action plan.

In 2025, 70 employment contracts and 2 agreements with business partners were terminated on grounds of unethical behaviour. Roche's Business Ethics Incident Management System (BEIMS) enables our Management, the Chief Compliance Officer and the Chief Group Audit and Risk Advisory Executive to capture, track and monitor alleged violations, from initial reports through to resolution. The external Roche Group speak-up channel is available for everyone who is not a Roche employee or contractor.

Meanwhile internal employees and contractors use:

- The Roche Group Code of Conduct Help & Advice Line in case of compliance questions or uncertainties, and
- The Roche Group speak-up channel, to report in good faith a suspected violation, including a person they believe has done, is doing or may be about to do something that violates the Roche Group Code of Conduct or constitutes a workplace incident.

The Roche Group speak-up channel is a web-based service that allows for the confidential and anonymous reporting of compliance concerns, using either written or voice formats. The speak-up channel operates in 104 countries and 42 languages, making it available worldwide.

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

In 2025, 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 has prepared a dedicated training on human rights that will be rolled out to employees in the next year.

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

- Roche Position on Respecting Human Rights
- Roche Directive on Human Rights Due Diligence for Business Partners
- Roche Group Code of Contact
- Roche Group Employment Policy
- Roche Supplier Code of Conduct

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 2025

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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2026-Apr-28

I have the authority to bind Hoffmann-La Roche Limited

Matheus Vieira

General Manager
Roche Diagnostics Canada

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I have the authority to bind Hoffmann-La Roche Limited