

2. Ten guiding principles



Open and proactive

We want to be a transparent company and to be perceived as such. Concealing information can create mistrust and breed rumours, particularly when the information concerns a large public company like ours. This means that we need to provide relevant information openly and proactively.

Factual

It is of utmost importance that our information be based on facts. We want to build and maintain an atmosphere of trust and strong ethical behaviour by never intentionally conveying misleading or incorrect messages. This means that we must also avoid making unrealistic promises and raising false expectations. There must be no gap between what we say and what we do, plan to do, or expect to deliver.

One voice

Every day, large organisations like Roche are in contact with countless individuals inside and outside the company. Any statement issued by a Roche employee, whatever his or her job in the company, may be construed as an official statement of the company's position. While style and tone may be adapted to the target groups, the message content must be the same. It is therefore crucial to bring all messages into line with the agreed company position and to direct contacts from particular target groups

to the relevant Roche communication unit: analysts and investors to Roche Investor Relations (CFI) only, news and mass media representatives to the Media Office/Corporate Communications (CC), (at the local level to the affiliate communicator/site communicator only).

Media requests must be handled only by professionally trained staff members designated by Corporate (mass and news media), divisions (trade media) or affiliates (local news/mass and trade media).

Equal treatment

We want to inform all our stakeholders at the same time of relevant facts concerning Roche. This is an important factor in maintaining high employee morale, and it is clearly what is expected by individuals outside the company who take decisions or shape public perceptions of Roche on the basis of the information we provide. The relevant information we provide needs to be consistent, and whenever possible it should be released simultaneously to all our stakeholders. There may be exceptions because of time zone differences or the need to comply with legal requirements. Wherever legally possible, employees should learn about news directly from us rather than through third parties. If information must first be disclosed to a selected target group, a general information release to all our other stakeholder groups should be issued at the earliest possible time thereafter. Those people who receive advance information must be informed that they are

obliged to keep the information confidential and must not make use of it until it has been released into the public domain.

Respect for partners' needs

We respect our alliance partners' needs. Where information relevant to their stakeholders is involved, we coordinate communications activities with our partners to ensure that all target groups are equally well informed. We expect our partners to do likewise.

Balanced

We want the efforts by which we shape Roche's image to be an enduring success. We therefore do not take advantage of unsustainable short-term opportunities that might have negative repercussions at a later stage. Successful information management also requires a willingness to be open to issues and address problems or setbacks openly and at the appropriate time.

Professional service by professionals

We want to provide a high level of service in all our communication activities in terms of both quality and response time. We therefore ensure that professionals always speak to their counterparts: investor relations officers talk to analysts, media spokespersons to journalists, etc. Whatever the subject,




enquiries from the investment community or the media must not be answered by lay staff: they are to be forwarded to the Investor Relations group or to the relevant local or Corporate media team. These professionals make sure that feedback is given in time to allow analysts or reporters to do their work: for this they must often rely on swift support from other specialists in our organisation.

No speculation

We do not comment on rumours, nor do we speculate on the outcome of pending issues before the authorities or any third parties involved have taken their decision. Similarly, we do not promote gossip on personal matters, nor do we comment on issues relating to our competitors.

Privacy

Given the highly competitive environment in which it operates, Roche has a right to withhold information about its intentions, research and development activities, production processes, marketing plans and financial position until such time as disclosure is required or deemed appropriate. We comply with all relevant data protection laws.



Furthermore, we do not disclose budget figures. Rather, we provide broad guidance and general information on expected future performance in order to align internal and external expectations. We also believe that the relationships that we have with outside vendors and suppliers constitute a unique competitive advantage. We therefore prohibit the use of Roche's brand with endorsements of products and services, or other third-party testimonials, unless it improves the overall image of Roche in the marketplace.

Defending our position

Outside perceptions of Roche are not always consistent with our own, and it is to be expected that a large company like ours will sometimes draw hostile criticism. We see it as our duty to respond and articulate our position. We take a stand on issues that have an impact on our activities or reputation and use all appropriate means available to put our view across. This is of crucial importance, particularly in the areas of media and investor relations. We strive to engage adversaries on a factual basis and not yield to views or criticisms that may be put forward by cause-oriented groups to further their agenda.