

Roche Social Media Principles

Social media like blogs, wikis, social networks (e.g. Facebook, YouTube, LinkedIn etc.), team spaces or personalised web sites are changing the way we are communicating, interacting, and doing business – with patients, customers and other stakeholders outside Roche, but also within the Roche network.

Despite new social media tools and platforms emerging and changing all the time, its basic aspect remains constant and is similar to traditional ways of communication: to engage in dialogue, provide and exchange information, and build understanding. Social media's high speed, level of interactivity and global access to any information you publish merits particular consideration to the appropriate uses for these applications.

Roche recognizes the ubiquity and benefits of social media and welcomes its use – however, we also acknowledge that certain risks are associated with these new channels. We have therefore developed this guideline to help you use these new platforms in a responsible way. Given the fast changes and continuous new developments in this area, we will review the guidance regularly and update if new aspects arise.

The best advice is to approach online worlds in the same way we do the physical one – by using sound judgment and common sense, by adhering to the Company's values, and by following the [Roche Code of Conduct](#) and all [other policies](#).

In case of questions please contact our communications teams or the Roche [Social Media Advisory Board](#).

Basel, August 2010

Ground rules for participating in online communications

There is a big difference in speaking “on behalf of Roche” (as an official spokesperson) or speaking “about” Roche, our products or business partners. It is important that you always remember who you are or who you are representing and what your role is in the social media community.

Just as with traditional media, we have an opportunity – and a responsibility – to effectively manage the company’s reputation online and to selectively engage and participate in the thousands of online conversations that mention us every day.

Do take time - despite the speed and urgency of the new opportunities and challenges – to think through and plan for your engagement in the social media field. Always remember that engaging in social media is not a one-off activity. What is the long-term concept: who do you want to engage with, for what aim and result, what are opportunities and risks?

Once you enter the dialogue, you will have to live up to the expectations of others regarding appropriate and knowledgeable responses, as well as commit to follow-up over a longer period of time. Define a clear plan and responsibilities as with any other communication project.

Hence, our core values - integrity, passion and courage - together with the rules outlined in the [Roche Group Code of Conduct](#) and the [Communication Policy](#), provide the framework in which every colleague can use new media tools, while also minimizing the risks for the company and individuals.

Roche Social Media Principles in short:

<p>7 Rules for PERSONAL online activities <i>Speaking “about” Roche</i></p> <ul style="list-style-type: none"> ▪ Be conscious about mixing your personal and business lives. ▪ You are responsible for your actions. ▪ Follow the Roche Group Code of Conduct. ▪ Mind the global audience. ▪ Be careful if talking about Roche. Only share publicly available information. ▪ Be transparent about your affiliation with Roche and that opinions raised are your own. ▪ Be a “scout” for sentiment and critical issues. 	<p>7 Rules for PROFESSIONAL online activities <i>Speaking “on behalf of” Roche</i></p> <ul style="list-style-type: none"> ▪ Follow the Roche Group Code of Conduct and Communications Policy. ▪ Follow approval processes for publications and communication. ▪ Mind Copyrights and give credit to the owners. ▪ Use special care if talking about Roche products or financial data. ▪ Identify yourself as a representative of Roche. ▪ Monitor your relevant social media channels. ▪ Know and follow our Record Management Practices.
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7 Rules for personal online activities

Speaking “about” Roche

These principles apply to those personal online activities where you might refer to Roche or one of our products or businesses:

1. **Be conscious about mixing your personal and business lives.** There is no separation for others between your personal and your business profiles within social media. You must be aware of that. Roche respects the free speech rights of all our employees, but you must remember that patients, customers and competitors as well as colleagues may have access to the online content you post. Keep this in mind when publishing information online and know that information originally intended just for a small group can be forwarded on.
2. **You are responsible for your actions.** You are “speaking” publicly and your contribution may stay searchable and retrievable for a long time to a broad audience – both internally and externally. Anything that brings damage to our business or reputation will ultimately be your responsibility. This does not mean that you should refrain from any activity, but that you should use common sense and take at least the same caution with social media as with all other forms of communication.
3. **Follow the Roche Group Code of Conduct.** When “speaking”, be compliant with the [Roche Group Code of Conduct](#), as well as all other [Roche Positions, Policies & Guidelines](#) (i.e. Protection of Privacy, Rules on Insider Trading, etc.). Be respectful of all individuals, races, religions and cultures; how you conduct yourself in the online social media space not only reflects on you – it can fall back on Roche and all our employees.
4. **Mind the global audience.** Even if you are posting on a “local” platform, the information may be accessed globally. This is particularly important in our regulated business. While your message may be accurate in some parts of the world, it could be inaccurate or violate regulations in others. Be mindful that different cultures have different values, and statements that are deemed acceptable or even funny in one culture may be considered offensive in others. Keep that “world view” in mind when you are participating in online conversations.
5. **Be careful if talking about Roche. Only share publicly available information.** You are not allowed to talk about the revenue, future plans, or the share price of Roche as this may have serious legal repercussions for you and the company. Engage only in discussions where you are comfortable and knowledgeable about the topic. Make sure to share only information that is publically available. If you are unsure if information is publically available or is otherwise inappropriate to post, contact your Communications Department before posting any such information.
6. **Be transparent about your affiliation with Roche.** If you are commenting on any of Roche’s or our competitors’ products or initiatives in a public forum or on a website or personal blog, make sure to fully disclose your affiliation with Roche and that your opinions are personal and not attributable to Roche. (Example: “I work for Roche. All opinions expressed are my own and do not necessarily represent the position of my employer”)
7. **Be a “scout” for sentiment and critical issues.** Even if you are not an official online spokesperson, you are one of our most vital assets for monitoring the social media landscape. If you come across positive or negative remarks about Roche or its products online that you believe are important, consider sharing them by forwarding them to your local communications department. This is most important in the case of so-called “Adverse Events”: When you come across information where somebody mentions side-effects after having taken one of our drugs in a credible and identifiable way, you have to immediately forward such information to the [global Drug Safety Team](#) for further action.

7 Rules for professional online activities

Speaking “on behalf of” Roche

The following principles outline what to consider when representing Roche as an official online spokesperson:

1. **Follow the [Roche Group Code of Conduct](#) and [Communication Policy](#).** In the core of all communication engagements is our commitment to transparency, balanced information and equal treatment of all parties. All interaction should be in the spirit of our corporate values and principles, tailored to each respective audience.
2. **Approval processes for publications and communication.** All of Roche’s communications have to be correct and clear, and remain in line with our general standards for information. Principally, the same approval processes as with any other official communication and publications of Roche apply. Given the interactivity and speed of the new medium, however, it is not realistic to have each response undergo full approval by communications, legal and regulatory. Therefore, you should establish with your usual approval partners a common agreement on a bandwidth of topics and instances that may not require the normal process. Use your professional judgement as a communication expert, and if in you have any doubt about a specific message, seek advice from a senior communicator or the Social Media Advisory Board prior to posting.
3. **Mind copyrights and give credit to the owners.** Always make sure to give credit to the original authors of any content that you are publishing (text, images, trademarks, video etc.) from a 3rd party, and that Roche has the copyright or written approval for using said material.
4. **Use special care if talking about Roche products or financial data.** Communication about the revenue, future plans, or the share price of Roche as well as statements about our products (“promotional information”) is reserved to experts in the field who have been trained to do so. If you need to provide information in one of these areas, stick to available Q&A or refer to content that is available in the public domain (e.g. on a Roche website). All such information has to be approved by legal and corporate communication before being posted. This is also applicable to contributions in forums or on knowledge data bases like Wikipedia.
5. **Identify yourself as a representative of Roche.** If you are communicating on behalf of Roche it should go without saying that you must always provide your full name and function in which you are communicating. Make clear what your role is in the respective social media environment and refer to these guidelines or a specific set of rules when needed (e.g. on a proprietary Roche channel).
6. **Monitor your relevant social media channels.** Make sure that you know what is being discussed, so that you can respond when issues arise. Have rules in place to deal with potential Adverse Event reports or potentially inappropriate or illegal content appearing in your sphere of responsibility. Also, be mindful of any obligations to preserve data that may be subject to a legal hold.
7. **Know and follow record management practices.** Roche has regulatory and legal obligations to retain certain information as records. You must therefore ensure that all relevant information which will be interpreted as a Roche position is captured and will be retained in a trustworthy and admissible manner in line with the Roche Records Management Directive. Keep records of our interactions in the online social media space. Because online conversations are often fleeting and immediate, it is important for you to keep track of them when you’re officially representing Roche. Remember that online Company statements can be held to the same legal standards as traditional media communications.