

# **Roche Directive on the Use of Roche Electronic Communication Tools**

**Version 1.2, 21 February 2012**

## Document Information

### General Information

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### Use of the document

<b>Internal use only</b>	<b>Intranet</b>	<b>Internet</b>	<b>...</b>
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### Document History

<b>Version</b>	<b>Reason for Change</b>	<b>Date effective</b>
Draft	Legal retention and storage requirements, new services	Draft
1.0	Roche Directive on the Use of Roche Electronic Communication Tools, approved by Corporate Executive Committee	September 2000
1.1	Roche Directive on the Use of Roche Electronic Communication Tools, amendment of sections 2 and 6	27 March 2009
1.2	Roche Directive on the Use of Roche Electronic Communication Tools, amendment of sections 2 and 6	21 February 2012

## *Global Roche Directive*



Approved by the Corporate Executive Committee in September 2000

# **Roche Directive on the Use of Roche Electronic Communication Tools**

## **1. Objective**

This Roche Directive on the use of Roche electronic communication tools ("Directive") outlines the main rules of conduct to be observed by Roche employees when using Roche electronic communication tools.

## **2. Definitions**

- The term "Roche electronic communication tools" covers the company's own:
  - Hardware such as telephones, fax machines, handhelds and computers and
  - Social media and collaboration tools, e.g. e-mail- messenger-, intranet- and internet-systems such as blogs, wikis, forums, etc.
- The term "personal use" means every instance of use that is not directly related to Roche's business purposes.

## **3. Application**

- Roche electronic communication tools are to be used in principle and primarily for business purposes.
- In exceptional cases, Roche employees may use Roche electronic communication tools for their own personal use, as long as all of the following preconditions are met:
  - the employee's personal performance at work is not impaired;
  - other employees' work is not negatively affected;
  - Roche does not incur significant additional costs;
  - only a minimum of IT system resources are used;
  - the use is in keeping with due care, confidentiality and legal compliance as set forth in article 5 below.
- Under no circumstances may Roche electronic communication tools be used for purposes aimed at the pursuit of a private business in order to obtain income.

## **4. Security**

- Employees who have access to Roche electronic communication tools must handle these with due care and ensure that they are not damaged, lost or otherwise displaced.
- Mobile electronic communication tools made available by Roche to its employees can be taken away from the company's premises or rather brought back to the company's premises without special

permission. However, the security staff may check the legality of the import/export.

## **5. Due care, confidentiality and legal compliance**

- Content created when using Roche electronic communication tools must always be worded with the due care appropriate to each particular case.
- Content shall be provided only to those persons, both inside and outside the company, who actually need to have access.
- Content may only be kept as long as needed and must be discarded and/or deleted immediately after. Or better: Content in the form of official records must be stored in compliance with the Roche Global Records Directive. All other content must be discarded and/or deleted when it is no longer needed.
- Confidential information must be treated with the necessary caution. In using electronic communication tools via the internet-system, the confidentiality of content cannot be guaranteed unless it is encrypted.
- The following types of content may not be created or provided:
  - when the content may be illegal, indecent, discriminatory, harassing, derogatory, dishonourable, threatening or morally offensive;
  - when using documents and/or computer software made in breach of copyrights;
  - in connection with chain letters;
  - when the author's identity has been changed or concealed.

## **6. Content ownership**

The owner of a social media and collaboration tool is responsible for the management of the records stored within the respective social media and collaboration tool. This includes taking the appropriate steps when realising that content of the records is not in line with these guidelines (informing the legal department or compliance officer). Appropriate steps must also be taken when information becomes outdated or becomes subject to legal or regulatory retention requirements (in line with Roche Global Directive on Records Management).

## **7. Data privacy**

- The use of Roche communication tools and social media and collaboration tools by individual users is subject to data privacy laws. Roche is entitled to access and process content in the context of inspections/investigations or audits and in the course of maintenance operations that are necessary to remedy a malfunction or to secure data in the respective system. Roche and its IT staff are allowed to make the information obtained in this manner accessible to third parties only if privacy is assured and if such a disclosure is absolutely necessary for the completion of the job in question.
- Data privacy is not unreservedly guaranteed. Data privacy may be rescinded for individual users in accordance with the applicable local legal requirements. For example such a step can be considered if there are legal grounds such as the prevention or limitation of damage which Roche or Roche employees might otherwise incur or in the context of inspections/investigations and audits. It is up to the legal department and the Roche IT-security department to decide, in consultation with the relevant human resources manager, on a case by case basis to what extent such measures can be taken.

## **8. Measures**

- All companies in the Roche Group must take the necessary technical and organisational steps to guarantee compliance with this Directive.
- This Directive does not affect the provisions of the Roche IT security policy and other detailed regulations in force at department or any other level; such regulations must always be observed.

## **9. Enforcement**

- All individual Roche companies are responsible for enforcing this Directive.
- All Roche employees must be informed accordingly.

## **10. Entry into force**

This Directive regarding the use of Roche electronic communication tools was adopted by the Corporate Executive Committee in September 2000 and entered into force the same day.