



HUMAN RIGHTS POLICY STATEMENT 2023

1. Introduction

BioNTech is committed to improving people's health worldwide with its fundamental research and its work in the development of immunotherapies utilizing the full potential of the immune system to fight cancer, infectious diseases, and other serious diseases. BioNTech supports the United Nations Sustainable Development Goals (SDGs). Its research and product development efforts make a relevant contribution to supporting the third United Nations Sustainable Development Goal (SDG 3): Ensuring healthy lives and promoting well-being for all people of all ages. This aligns with the Company's commitment to global social responsibility. Core to BioNTech's business practices is ensuring that people globally benefit from its efforts. To accomplish this, the Company intends to maintain a focus on addressing high medical needs and prioritizing equitable access to novel medicine and technological innovation in healthcare. As an environmentally and socially conscious company, BioNTech respects the UN Guiding Principles on Business and Human Rights. As a responsible corporate citizen, the Company holds itself accountable to prevent, identify and mitigate any adverse impacts on human rights within its operations and value chain.

2. Applicability

This Policy Statement applies to BioNTech SE and its affiliates (BioNTech SE together with its affiliates being "BioNTech"), including but not limited to all Management Board members, all other officers, and employees collectively referred to as "BioNTech Representatives."

The content stated in this Policy Statement is relevant for all those BioNTech Representatives (or their delegates) and business partners. BioNTech expects business partners to acknowledge and commit to all relevant human rights and environmental covenants and all BioNTech's standards set in this policy statement as well as the Supplier Code of Conduct.

3. Commitment

To ensure a solid and comprehensive approach to human rights, BioNTech developed its strategies and commitments based among others on the following leading standards: the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, UN International Covenant on Economic, Social and Cultural Rights, UN International Covenant on Civil and Political Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. Additionally, BioNTech is a signatory to the UN Global Compact, an initiative based on 10 principals in the areas of human rights, labour, environment, and anti-corruption.

4. Human rights due diligence process

BioNTech carefully conducts business in its daily operations respecting people and the environment governed by the Code of Business Conduct & Ethics, Supplier Code of Conduct, and other policies. These BioNTech-specific ethical business conduct obligations apply to BioNTech's operations and business partner relationships. Ensuring the understanding and compliance, these BioNTech-specific requirements are implemented through standard operating procedures, training, upskilling, and audits.

Risk identification

BioNTech commits to performing a proactive risk analysis, to early on identifying potential, and timely mitigating actual human rights and environment-related risks and incidents. The risk analysis will be deployed globally as well as in each country BioNTech operates in, updated annually or ad-hoc to evaluate potential risks in case of significant changes to the Company's operations or business relationships. BioNTech is implementing ad-hoc risk assessments as necessary, based on human rights and environmental risk concerns.

Grievance mechanism

BioNTech strives to identify and mitigate risks in its own operations and throughout its value chain and encourages all internal and external stakeholders to report to BioNTech any concerns or potential risks regarding human rights, environmental practices, products, corruption, etc. These concerns will be reported and handled to the responsible employee or department, or the human rights representative may be contacted directly. Additionally, concerns can be reported anonymously through BioNTech's whistleblowing tool, "Ethics Contact Point." BioNTech is committed to protecting any person who raises his/her concern on reasonable grounds, regardless of which reporting channel was utilized.

Preventive measures

Relevant preventive measures are taken as part of standard operating processes, particularly in the areas of Safety, Health & Environment, and Clinical Studies. Furthermore, the company is strengthening all its business functions related to human rights by providing adequate resources. The responsible employees receive appropriate training and are advised and supported by external human rights experts.

Remedy

Identified risks and violations are carefully weighed, reviewed, and prioritized to derive the appropriate engagement level and course of action. BioNTech will prioritize the

implementation of effective and appropriate remedial actions to prevent, minimize, or ideally end the extent of potential adverse impacts or violations.

Reporting

BioNTech will publish an annual report, addressing the identification of human rights and environmentally related risks and potential violations of due diligence obligations, according to international or national laws and standards. Furthermore, preventive and mitigation measures are taken to remedy identified potential risks or violations. Going forward BioNTech will continuously refine and adapt the assessment and derived measures while assessing impact and effectiveness. All documents on the fulfillment of BioNTech's due diligence obligations will be stored for a period of at least seven years.

5. Relevant human rights topics

The following human rights topics are the result of initial due diligence and were identified as relevant human rights topics. BioNTech continuously strives to improve and therefore, will progressively define and expand on the below listing, in the context of the risk analysis to be implemented starting in early 2023.

Right to health

Right to Health derives from Article 25 of the Universal Declaration of Human Rights. BioNTech is committed to improving people's health worldwide with its fundamental research and its work in the development and manufacturing of vaccines and immunotherapies utilizing the full potential of the immune system to fight cancer, infectious diseases, and other serious diseases.

Access

As part of this effort, BioNTech continues to focus on high unmet medical needs – especially the development of cancer therapies and vaccines against some of the world's most common infectious diseases – and equitable access to innovations in healthcare. With its research programs, the Company can potentially have a major impact on global population health and also on the population of low- and middle-income countries which are, for instance, disproportionately affected by cancer and infectious diseases, such as malaria or tuberculosis. BioNTech developed manufacturing sites capable of developing fully automated production processes for on-demand production of therapies and vaccines as well as a concept for shippable, modular, and turnkey mRNA manufacturing facility, called BioNTainer, to support a decentralized and scalable vaccine production that addresses local needs.

Clinical trials

BioNTech ensures that all clinical research activities meet or exceed the international ethical standards in respecting and protecting the rights, well-being, safety, and dignity of all participants in our clinical trials. Clinical trials are carefully designed, extensively monitored, and require prior approval by national authorities and independent ethics committees (IECs) or institutional review boards (IRBs). These trials are conducted in different regions within a single country as well as in multiple countries.

Each clinical trial is conducted according to the approved clinical trial protocol, a document that describes how a clinical trial will be conducted and ensures the safety of the trial subjects and integrity of the data collected. The protocols of BioNTech's clinical trials are in compliance with ethical principles that have their origin in the Declaration of Helsinki (2000), Council for International Organizations of Medical Sciences (CIOMS) International Ethical Guidelines, International Council of Harmonisation (ICH) for Good Clinical Practice (GCP) guidelines, and applicable laws and regulations.

Trial participants will be informed promptly if new information becomes available that may impact their well-being and/or their willingness to participate in the trial. Trial participants are only included in the trial based on their free informed consent.

BioNTech honors participant privacy by safeguarding personal data per the applicable data protection requirements. All data collected during clinical trials is kept confidential. Personal data regarding a trial participant's identity will not be transferred to BioNTech and will not be included in any reports or publications.

Irrespective of the outcome, BioNTech submits the outcomes for all primary and secondary outcome measures in clinical trials for publication in publicly accessible and reputable academic journals (in accordance with the International Committee of Medical Journal Editors (ICJME) standards). Further, BioNTech commits to disclose information about clinical data and clinical trials i.e.: "BioNTech Transparency Declaration," in line with all applicable laws and regulations, including data privacy laws.

Health and safety at work

BioNTech's success and overall operations depend on the health and well-being of its staff, its research, and its products. The Company promotes a culture of occupational safety and follows adequate safety procedures especially put in place for this. To avoid accidents and work-related illnesses, employees are provided with the necessary safety

instructions, personal protective equipment, and training, to safely and responsibly fulfill their roles and tasks. A dedicated Safety, Health, and Environment team sets standards of occupational health, safety, and environmental protection across all its sites meet or exceed the standards required by law. It also supports functions and sites and checks compliance with defined standards.

Nondiscrimination, inclusion, and diversity

Discrimination, favoritism, or harassment based on gender, political opinion, religion or belief, nationality, ethnic or social origin, age, sexual orientation, marital status, disability, physical appearance, health status or any other aspect of personal status is not tolerated.

Diversity is an important factor in BioNTech's success, as different cultures and perspectives contribute to its achievements. Moreover, the Company is a signatory of the *Charta der Vielfalt* since 2018, an initiative that promotes the inclusion of diversity in the working world in Germany.

Compensation and working hours

The development and production of BioNTech's innovative therapies and product candidates are possible due to its motivated and ambitious employees. The Company aims to be an employer of choice through its purpose and its competitive employment offer, as well as through its competitive, transparent remuneration systems.

Globally, BioNTech aims to offer a competitive wage based on local market practices. However, the minimum standard is to compensate employees in accordance with, or exceed, the legally required minimum wage.

The employees' right to rest is respected and working hours per day/week are limited. Moreover, an adequate recovery time is ensured.

Child labor

BioNTech prohibits any form of child labor (including child labor defined in ILO Convention No.138 on minimum Age and the ILO Convention No. 182 on the Worst Forms of Child Labor)", in its operations and value chain. The Company abides by the local minimum age for employment based on local compulsory schooling and not younger than 15. Young workers under the age of 18 will only be allowed to perform non-hazardous jobs. When recruiting, the Company collects and verifies relevant personal employee identification information (e.g., age, nationality) and documents the information securely in the digitalized personnel files.

Freedom of association

BioNTech respects the rights of every individual and is committed to complying with the labor laws in the markets where it operates. Employees are free to join or not join any union of their choice to represent them and engage in collective bargaining. Moreover, the Company complies at a minimum with the provisions of the ILO Core Labour Standards Nos. 87 and 98 on freedom of association and the right to collective bargaining, without prejudice to more favorable national regulation.

Forced labor

BioNTech aims to prevent or mitigate any adverse impact on human rights that are directly linked to its operations, products, or services, or that may arise from its business relationships. Forced labor practices are not tolerated and BioNTech does not partner or conduct business with any individual or company that participates in forced, bonded labor, or involuntary prison labor.

6. Governance

Human Rights at BioNTech are guided by the values and expectations in the Code of Business Conduct & Ethics, as well as the Supplier Code of Conduct for matters on the activities of the Company's business partners.

BioNTech holds itself and its business partners accountable to these standards.

Situational changes in the internal and external landscape are actively assessed and reported for political, social, or environmental changes which may adversely impact the human rights of the Company's employees and surrounding communities. Where possible and reasonable, BioNTech will offer its services and product to remedy emergencies as well as to support and protect human rights.

The Code of Business Conduct & Ethics applies to all BioNTech Supervisory Board members, Management Board members, directors of subsidiaries, and employees. The Code serves as the foundation and guideline for all BioNTech's actions and interactions. The Code of Business Conduct & Ethics is communicated to all employees at all locations. Employees need to confirm their awareness, understanding, and mandatory compliance with their signature.

The human rights risk management on the compliance with human rights due diligence obligations is overseen by the Human Rights Officer (HRO) reporting to the Management Board annually or at a higher frequency if required. The HRO is tasked with conflict management, decision-making, and setting the human rights agenda. Adequate staff support and a budget is available to the HRO.

This structure is aligned with the Code of Business Conduct & Ethics. This structure and the [Grievance Process](#) are accessible to all internal and external stakeholders to review the guiding principles and voice any potential concerns including human rights, environment, anti-corruption, etc.