

CODE OF BUSINESS CONDUCT & ETHICS



BIONTECH

TABLE OF CONTENTS

INTRODUCTION BY THE MANAGEMENT BOARD

OUR VALUES

Corporate values 8

Our corporate mission and values 10

Ethical decision making 10

Speak up culture 12

Where to go for help 12

OUR PARTNERS IN THE HEALTHCARE COMMUNITY

Interactions with healthcare professionals 16

Interactions with government officials 17

Interactions with patients and the patient community 17

Patient safety and product quality 19

Product promotion 20

Publications 20

OUR PLACE IN THE GLOBAL COMMUNITY

Fair competition 24

Trade compliance 25

Bribery and entertainment .. 26

Conflicts of interest 27

Fraud and anti-money laundering 28

Data privacy and personal information 30

Third-party relationships and management 31

Diversity and respect in the workplace 33

OUR DUTY TO EACH OTHER

Discrimination and harassment 38

Health and safety in the workplace 43

OUR DUTY TO THE INVESTOR COMMUNITY

Company assets 46

Patents, trademarks and copyrights 46

Confidential and proprietary information 47

Social media 49

Information systems 49

Accurate books, records and financial controls 51

Disclosure commitment and insider trading 51

OUR DUTY AS CORPORATE CITIZENS

Human rights 54

Transparency and cooperation 56

Tax compliance 56

Treatment of animals 56

The environment 56

FURTHER INFORMATION AND REMINDERS

INTRODUCTION BY THE MANAGEMENT BOARD

BioNTech develops, produces, and distributes highly innovative biopharmaceuticals and bio-marker-based diagnostics for the treatment of cancer, infectious diseases and rare genetic diseases. As a research-driven biotechnology company, we set out to achieve both scientific and commercial success. In doing so, we are guided by a very clear mission – to bring highly effective, individualized, and innovative therapies to market and make them available to patients around the globe.

Responsible, lawful and ethical behavior is a fundamental prerequisite for achieving these objectives – whether in the laboratory, when dealing with colleagues, collaborators and business associates, or in contact with doctors and patients. We must continue to be a partner that our patients, the healthcare community, our collaborators and our shareholders can trust.

This Code of Conduct comprises a set of principles that serve as a yardstick for our own performance and help us make correct decisions in our daily work. It provides guidance on our business

standards and practices so that it is clear what we expect of you and what you should expect from your colleagues and co-workers. Equally, it should give you confidence that BioNTech is committed to doing the right thing, even when faced with difficult choices.

In conjunction with our objectives, our mission, and our vision, this Code of Conduct forms the framework within which we operate. It is intended to support each of us in understanding the values and ethical principles of our Company and putting them into practice.

In our efforts to achieve this success, full legal compliance and a strong sense of ethical responsibility underpin everything we do. Acting with integrity is non-negotiable for BioNTech.

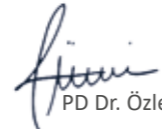
Every day, we call on each of our staff members and partners to apply this mindset to their own activities.

BIONTECH




Prof. Dr. Ugur Sahin – CEO & Founder




PD Dr. Özlem Türeci – CMO




Dr. Sierk Poetting – CFO & COO




Sean Marett – CBO & CCO



OUR VALUES

Corporate values

Our corporate mission and values

Ethical decision making

Speak up culture

Where to go for help

CORPORATE VALUES

Our Code of Conduct should be used as a guide on how to behave when performing your work for BioNTech.

It provides an overview of important laws, regulations, and BioNTech's internal policies, that apply to us and our work. As an innovative company working in a fast-paced and highly regulated industry, we count on every employee, officer and Board member to follow our Code of Conduct and make decisions that will preserve the trust our partners and patients have placed in us. We expect nothing less from our business and scientific partners, including our suppliers, distributors, consultants, service providers, HCPs, academic and research institution partners, collaborators and joint venture partners.

Our Code of Conduct ensures respect for our core values, even if it does not cover every situation you may face as a BioNTech employee or partner. Instead, it lays the foundation for how we must conduct business in critical areas. Therefore, it is key to use good judgement in everything you do. Please ask for help if you are unsure about the right course of action. Often, we will also point

to additional policies where you can find more information. Additionally, you should always feel comfortable to approach your line manager, the Legal Department or Compliance Department if you are unsure.

Not sure?

Ask yourself:

- > Does it reflect our values?
- > Is it good for BioNTech and my co-workers?
- > Would I be comfortable if someone knew about this?

If you can answer YES to all these questions, it is probably safe to move forward.

But if you answer NO or NOT SURE to any of them, stop and reconsider.

In any situation, always feel free to ask for help!



OUR CORPORATE MISSION AND VALUES

Our corporate mission is to develop and bring to market highly effective, individualized, and innovative therapies and make them available to patients around the globe.

Our corporate values represent what we consider to be important and what we want to stand for as a Company. They serve as a practical compass, shaping our corporate identity and underpinning how we should act to achieve our corporate mission.

BioNTech stands for visionary thinking and pioneering spirit – with our work we strive to revolutionize cancer immunotherapy.

Innovation and innovative thinking in all areas of work is the cornerstone of our success.

Passion and enthusiasm guide our daily work and everything we do.

Unidarity* serves as the basis to achieve our ambitious goals, with the support of our employees and partners.



ETHICAL DECISION MAKING

No matter what job you do, you are BioNTech, and we could not be innovative without you. Think about that as you do your job. Make sure your actions always reflect our corporate values.

Follow our Code of Conduct and the supporting policies and guidelines, as well as the laws and re-

gulations of the country where you work. If norms from different countries contradict each other, apply the stricter rule. We will provide you with training on these policies and relevant laws and regulations applicable to your role. We expect you to complete your assigned training, as it is the best way to stay updated and protect what we have built together.

Misconduct affects all of us; therefore, no concern is too minor to report. If you observe a behavior that could be illegal, unethical or not in line with our corporate values, policies or Code of Conduct, promptly share your concerns with your line manager, the Legal or Compliance Department, or through our confidential reporting line – the contact details are provided on page 13. We will listen to your concerns and promptly address them in an appropriate manner.

If you manage people, you have an even greater responsibility to ensure compliance with our corporate values and Code of Conduct. As part of the BioNTech management team, you are expected to lead by example and ensure that your team members understand and can reference this Code of Conduct. Remember, there should be no differ-

ence between what is expected of you and what you should expect from your colleagues, co-workers and team members. Create a working environment where team members feel comfortable sharing concerns or asking questions. Never retaliate against anyone for sharing their concerns. If you do not follow this Code of Conduct, you may face disciplinary or corrective actions. Such actions may include termination of employment with BioNTech.

What if?

I suspect that someone is violating the Code of Conduct, but I am not certain? Should I keep my concern to myself?

- > No. If you suspect a violation, speak up. It's better to raise a concern and come forward honestly even if, after an investigation, it turns out that you were mistaken.

* Unidarity is a neologism derived from unity and solidarity

SPEAK UP CULTURE

We know it takes courage to come forward and raise your concerns. Therefore, we do not tolerate retaliation against anyone who shares their concerns or asks questions.

WHERE TO GO FOR HELP

Do you have a question, problem or concern? In most situations, your manager should be your first point of contact. Your manager is most likely to be in the best position to understand your concerns and to take appropriate action. If you prefer to speak with someone else, or if you feel your concerns have not been addressed by your manager, reach out to any member of the groups listed below or directly to our reporting line given on the next page:



Regardless of who you contact, you can be sure that you are doing the right thing for BioNTech. Your concerns will be managed promptly and in an appropriate manner. At BioNTech, we will

thoroughly investigate reports of misconduct and will only disclose information to those who need access to it to resolve the problem.

THE REPORTING LINE IS ALSO A RESOURCE AVAILABLE TO YOU

You may contact the reporting line anytime, by phone, email or web intake, to speak up with questions or concerns regarding violations of this Code of Conduct, our policies or procedures, or the law. You may submit a concern confidentially.

- email: corporatecompliance@biontech.de
- phone:
 - > from Germany: 0800 000 8972
 - > from the US: 844 901 0271
 - > from other countries: +1 757 278 0107
- web intake: <https://biontech.gan-compliance.com/caseReport>



OUR PARTNERS IN THE HEALTHCARE COMMUNITY

- Interactions with healthcare professionals
- Interactions with government officials
- Interactions with patients and the patient community
- Patient safety and product quality
- Product promotion
- Publications

INTERACTIONS WITH HEALTHCARE PROFESSIONALS

Working with healthcare professionals (HCPs) who are experts in their fields is an important way in which BioNTech ensures appropriate product quality and patient usage. The safe and effective use of our products is our main goal. Our relationships

with HCPs should be professional, and our interactions with them should always be conducted with integrity. To do so, we must never improperly influence HCPs, as every one of their decisions should be made in the best interests of their patients. Your interactions with HCPs should always be aligned with ethical and professional standards.

MAINTAIN INTEGRITY

How can I maintain integrity in my relationships with HCPs?

You should always consider these following points when interacting with an HCP:

- > All communications must be accurate and balanced: no aspirational, misleading or false statements should be made.
- > Always comply with medical, legal and regulatory standards.
- > Trust HCPs and respect their judgement.
- > All communications should be documented.

Refer to the appropriate local codes of practice.

If you do not know which standards and codes of practice apply to your interaction, think – am I the right person to be having this conversation? Should I seek some guidance first?

Engaging HCPs is an important responsibility. HCPs are selected very carefully through evaluating criteria such as medical expertise, professional experience, and medical specialization. An HCP’s compensation should always be carefully determined and should be based on fair market value. Transfer of value for items such as meals and travel should only be provided if necessary to facilitate a business discussion, not to build rapport or relationships. Remember – always comply with anti-bribery and corruption laws as well as international and national transparency and regulatory notification requirements when dealing with HCPs.

INTERACTIONS WITH GOVERNMENT OFFICIALS

Because we bring science forward, we believe it is our responsibility to share relevant data and insights to inform the public debate and lawfully interact with government bodies, elected officials and government employees. However, we want these dialogues to be based only on relevant, conclusive, and honest information and proven scientific data to address challenges in the healthcare environment and its regulatory framework.

No gifts, entertainment or hospitality should be offered or proposed to a government official, even if it is a genuine gift that is made without mentioning the Company.

We expect the same adherence to ethical and transparent approach by all of our partners, from employees through vendors to research centers, when interacting with government officials.

INTERACTIONS WITH PATIENTS AND THE PATIENT COMMUNITY

Ethics.

Integrity.

Professionalism.

The core of our work revolves around the interaction we have with patients and the solutions we are bringing to them. BioNTech places its relationship with patients at the center of its work. Our Company and products thrive on our patients’ feedback. Therefore, everyone working within our Company should be committed to the benefit of our patients and their care.



We must never influence the patient-doctor relationship. It is important to trust that the HCP and the patient are collectively making decisions in line with the patient's needs. Offering patients good solutions is only possible by listening to them and doing our best to give them all the information they need to make an informed decision.

We are dedicated to transparent interactions with patient advocacy organizations to provide solutions and information that meet the needs of the patient community. If a patient advocacy organization contacts you about our Company or product, whether in a positive or negative manner, please share this interaction with the internal teams responsible for patient engagement. It is important to stay professional and to keep in mind the patients' best interests.

Patients participating in research studies and clinical trials are treated in accordance with our policies. All clinical trials are conducted in compliance with the GCP, GMP, GLP, GDP, and GVP to ensure the best conditions for the patients.

Please read our Anti-Bribery and Anti-Corruption Policy, our Guidelines on External Interactions, our Fair Market Value Policy and our Purchasing Guidelines for further advice on these topics.

PATIENT SAFETY AND PRODUCT QUALITY

We want to revolutionize the treatment of patients through the delivery of quality products. For us, it is key that we meet or exceed regulatory requirements regarding patient safety and product quality in all our activities including research, development, manufacturing, packaging, testing, supplying and marketing of our products.

At BioNTech, quality means delivering products of the highest medicinal value. We believe in nurturing a culture of continuous improvement in which individuals strive for the highest quality in every step of the process.

We recognize and report adverse events, so that we help keep our products safe and fulfill our legal responsibilities.

PRODUCT PROMOTION

We believe in five principles regarding product promotion:

1

We do not promote a product before the product is approved for use under applicable laws.

2

We comply with all applicable laws, regulations, and BioNTech policies when promoting our products.

3

We ensure that promotional discussions involve only useful, accurate, and scientifically-sound information.

4

We ensure that promotional information is presented honestly, in a fair and balanced manner, and consistently with the product's label and prescription laws.

5

We never promise or give anything of value with the purpose of encouraging an HCP to prescribe or recommend our products. We never accept anything of value from an HCP.

PUBLICATIONS

We believe that our publications should be accurate, and information should be communicated in a timely and proper manner to the appropriate audience. But remember to protect any confidential or personal information from publication and to secure all intellectual property rights before publication.





OUR PLACE IN THE GLOBAL COMMUNITY

Fair competition

Trade compliance

Bribery and entertainment

Conflicts of interest

Fraud and anti-money
laundering

Data privacy and personal
information

Third-party relationships
and management

Diversity and respect
in the workplace

FAIR COMPETITION

We are convinced that our science enables us to outperform our competition fairly and honestly. We are successful based on our own merits, and we avoid any conduct that could be perceived as unfair competition. We are committed to adhering to all relevant competition laws and regulations in the markets where we operate.

While we expect BioNTech employees to compete vigorously, we also require them to compete fairly, and never use deception or misrepresentation to gain an unfair advantage over our competitors. When we talk to HCPs, government employees, patients or any external individuals, we must only provide information that is truthful and approved for external communication. We must never make disparaging comments about our competitors. Please see our Guidelines on External Materials and Guidelines on External Interactions for further information.

What if?

At a local industry association happy hour, I am approached by a sales representative from a BioNTech competitor who suggests that we meet for coffee next week to “coordinate” field activities in our shared sales territory. Can I meet him for coffee?

- > Trade association meetings are intended to have legitimate purposes. However, interactions between competitors may give the appearance of anti-competitive agreements. Although your attendance at the happy hour event would not require legal approval and clearance, any meetings with competitors for business reasons would require the individual to consult with the Legal Department to clarify appropriate topics for discussion.

TRADE COMPLIANCE

Governments around the world impose trade restrictions to support their economic, strategic, or national security interests. Our products, in their various stages of production, are subject to additional restrictions in many locations. To safely and lawfully provide our products to the patients who need them around the world, we must com-

ply with any trade controls that apply in the areas where we travel or do business.

Follow Company procedures and controls, including due diligence procedures, to make sure that you conduct business only with individuals or companies who have not been sanctioned and agree to comply with relevant obligations.

COMPETE FAIRLY

- > Comply with competition laws in the countries in which we operate.
- > Deal fairly with our customers, vendors, and competitors.
- > Compete based on the quality of our science and products.
- > Do not share our science, intellectual property, prices, business or pricing strategies, or plans with competitors.
- > Never enter into an arrangement with a competitor to:
 - raise or hold prices on our products
 - divide territories or markets
 - prevent another company from entering our market
 - refuse to deal with a customer or supplier
 - restrict production or sales
 - force patients or doctors to use our product by tying it to something they need.
- > Seek competitive information only from public sources.
- > Be fair, factual, and transparent in what you say and do. Do not make unapproved comparative claims.

BRIBERY AND ENTERTAINMENT

At BioNTech, we believe in working with honesty and integrity. We don't offer bribes, or let others bribe us. We expect our employees and partners to prevent bribery. This is because as a Company, we are not only responsible for our

own actions, but also for the actions of any third parties who represent us. For us, it's simple: bribery – of anyone, at any level, at any organization – is never acceptable. Always be mindful of the perception of your actions. When in doubt, please consult our Anti-Bribery Policy and associated guidance and training documentation.

WE DON'T GIVE OR RECEIVE ANYTHING INAPPROPRIATE

- > Use good judgment! Any gift that compromises professional judgment is always inappropriate.
- > Do not offer anything if it is being given to influence a decision or if it would give the appearance of something improper (even if the value is aligned with BioNTech policy).
- > Recognize there are strict rules around providing gifts or courtesies to HCPs and government employees; always check the applicable Company policy before offering anything of value to them.
- > Never ask anyone for a gift, meal or entertainment, and if someone is asking you, do not oblige.
- > Where it is permissible to make gifts, gifts should:
 - be inexpensive
 - be infrequent
 - be permitted by laws and policies of both BioNTech and the employer(s) of the person receiving the gift
 - not reflect poorly on BioNTech
 - never be cash, gift card, check, loan or stock
 - be recorded accurately in our books and records.

CONFLICTS OF INTEREST

A conflict of interest occurs any time an event happening outside of the workplace interferes with our work at BioNTech. We are all responsible for acting in the Company's best interests. We must avoid even the appearance of a conflict of interest. Employees must follow our Conflicts of Interest Policy. Members of the Supervisory Board or Management Board must take particular care regarding conflicts of interest.

If you discover that a personal activity, investment, interest, or association could have an impact on your objectivity – or even appear to impact it – disclose it immediately to your line manager, HR, or the Legal or Compliance Department. Many conflicts can be avoided or addressed easily if they are disclosed on time and managed appropriately.

If you are unsure of a situation, contact the Legal or Compliance Department or consult our Conflicts of Interest Policy to review the situation and receive guidance on the next steps regarding the situation.

What if?

I have been approached to sit on the Advisory Board of a patient association. Do I need to seek approval from someone at the Company prior to accepting this position?

- > Yes. You should inform your manager and contact the Legal or Compliance Department to review the situation and receive guidance on the next steps regarding the situation.

FRAUD AND ANTI-MONEY LAUNDERING

Countries may have different definitions of fraud, which includes data fraud and money laundering, but at BioNTech, we perceive fraud as deliberately deceiving a person or organization to unjustly obtain an unauthorized benefit, which could be money, property, or services. We encourage our employees and our partners to help us detect fraud and prevent it before it happens.

Examples of fraud include:

- theft of funds, products, or any other BioNTech assets (including physical and intellectual property and trade secrets)
- data fraud, such as manipulation of records, accounting information, or financial statements (including falsifying expense reports; understating liabilities; or overstating revenue, earnings and assets)
- misuse or forgery of documentation.

All employees are required to:

- conduct due diligence before engaging a new customer or vendor
- be alert, and only conduct business with organizations or individuals who are willing to provide us with appropriate information so that we can determine if the payments are legitimate
- not make any payment to an organization or accept payment from one that is not party to the contract or is not legally entitled to receive payments for the services, unless we receive prior approval from the Legal or Compliance Department
- not accept payments in cash.



DATA PRIVACY AND PERSONAL INFORMATION

We respect the privacy of our employees, customers, patients and any other individuals with whom we do business. We follow all applicable privacy laws such as the European Union General Data Protection Regulation (GDPR) and Germany's privacy law (Federal Data Protection Act).

When patients, customers or other individuals do business with us, they entrust us with their personal information. Having access to this information is key for our business and the advancement of science; therefore, we take responsibility for collecting, using and processing any personal information only for legitimate business purposes while protecting the data from possible misuse, inappropriate disclosure and loss.

Know the kinds of information that are considered private: Personal information is any information that could be used to identify a person, either directly or indirectly.

PROTECT PERSONAL INFORMATION

Protect our co-workers: Ensure that we protect the personal information of our colleagues in the same manner in which we would protect our own from deliberate or accidental disclosure. Whether we intentionally work with this information or come across it by accident, we must do all we can to handle it in a lawful and ethical manner.

Protect our customers: We take pride in having transparent relationships with customers. We want to make sure any disclosure of personal information is either required by law, or individuals have given their consent to the disclosure of this information.

Protect our patients: Patients provide us with crucial personal data without which we could not exist. Therefore, we must all be committed to use this information with care and only for the purposes of its collection.

In case of concerns, contact our Data Protection Officer: data.privacy@biontech.de

What if?

Someone accidentally emailed me a clinical report that includes names of patients and their DNA data. Should I just close it and forget I saw it?

> **No. If it was accessed by you, it could be accessed by other individuals who don't have the right to access this data. Contact our Data Protection Officer or the Legal or Compliance Department to help ensure protections are in place.**

THIRD-PARTY RELATIONSHIPS AND MANAGEMENT

At BioNTech, we work with vendors and partners, and these relationships are key to the development, production, promotion and commercialization of our innovative products. Choosing the right partners and making procurement decisions objectively is key to our success. We expect our employees to base their decision-making on objective

criteria such as quality, service, price, availability and reliability.

We rely on our partners and expect them to abide by the principles of our Code of Conduct and perform their business in a lawful manner. We also expect our employees to make partnership selection decisions by first completing appropriate investigation as stipulated in our Vendor Management Policy and training materials.

We also work with distributors and collaborate with research centers that interact directly with HCPs, government officials, and patients. Requirements under these contracts are often stricter than those of our other contracts, as we want to ensure that our partners follow the rules and never cut ethical corners.

We expect all our employees and partners to comply and cooperate with government requests for information, inspections and investigations. If you are contacted directly by a government official, contact our Legal or Compliance Department. If you are responsible for responding to a government request, be honest, do not be misleading, do not impede the request and do not alter or destroy any document.



ENSURING GOOD BUSINESS RELATIONSHIPS

> **If you are responsible for a relationship with a vendor:**

Follow our procurement and due diligence policies and processes.

Ensure the vendors know and intend to comply with the principles of our Code of Conduct.

Monitor contracts with vendors and ensure vendors meet their obligations and we meet ours.

Speak to the Legal or Compliance Department if you suspect any vendor misconduct.

> **Promote our integrity:**

Never share or seek confidential information before a contract is signed unless a confidential disclosure agreement is in place.

Never share other vendors' non-public or proposal information.

Never discuss employment or business opportunities with government procurement officials.

DIVERSITY AND RESPECT IN THE WORKPLACE

BioNTech is successful today because of our remarkable team members. We represent many ideas, experiences, and backgrounds. This is our strength, and we value each other's contributions and believe that everyone has an equal chance to succeed. This is essential for us to grow and deliver highly innovative biopharmaceuticals and biomarker-based diagnostics for individualized treatment of cancer and other serious diseases.



OUR DUTY TO EACH OTHER

Discrimination
and harassment

Health and safety in the
workplace

Our employees are our greatest asset and the key to our success. Their knowledge and commitment determine the quality of our work.

We thus strive to maintain an environment in which every staff member can feel confident of fair and respectful treatment, ensuring equal opportunities from hiring through compensation to professional development.

Particularly given our Company history, we are keenly aware that diverse cultures and perspectives enrich our business.

Accordingly, we embrace diversity as a valuable aspect of our Company culture – stretching across gender, age, and cultural background.



DISCRIMINATION AND HARASSMENT

At BioNTech, we do not tolerate discrimination, favoritism or harassment on the basis of gender,

race, religion or belief, nationality, ethnic or social origin, age, sexual orientation, marital status, disability, physical appearance or any other aspects of personal status. We strive to ensure a respectful environment with equal opportunities in all areas,

including recruitment and selection to professional development and succession planning as well as compensation. We perceive discrimination as unjust or unfair actions that are made either directly or indirectly against individuals or groups,

which may cause a hostile, intimidating or offensive working environment. Be aware that anyone who discriminates against or harasses another person may face corrective actions, up to and including termination of employment with BioNTech.

EXAMPLES OF UNACCEPTABLE BEHAVIORS				
Discrimination	Favoritism	Abuse of authority	Harassment	Sexual harassment
Not hiring, not granting fair terms and conditions, or not renewing a contract because of: gender, race, religion or belief, nationality, ethnic or social origin, age, sexual orientation, marital status, disability, or other aspects of personal status	Hiring people based on preferred backgrounds (national, racial, religious, etc.)	Repeatedly requesting subordinates to take non-urgent matters outside of regular working hours and /or weekends and holidays	Unfair treatment	Physical contact, such as assault, touching, blocking, hugging, kissing, patting, grabbing etc.
	Giving preferential treatment to extended family members or friends regardless of their qualifications		Requesting individuals to monitor and respond to non-urgent emails	
Limiting opportunities or making inappropriate comments and permitting inappropriate language or behavior in the workplace				Deliberately undermining a BioNTech employee by excessive and persistent criticism
			Insulting language or actions	

> **How do I help to eliminate inappropriate behaviors?**

Communicate clearly to others about conduct you find offensive.

Speak up against incidents that could be harassment, and support those affected.

Help limit the damage of such behaviors by taking an active role, and report any wrongdoing.

Act as a role model by maintaining high standards of personal conduct (treat everyone with respect and courtesy).

Never excuse or minimize disrespectful or harassing behavior.

> **Focus on the role of managers and supervisors:**

Communicate clearly that harassment is not accepted at BioNTech.

Take appropriate managerial action to address any concerns.

Promptly document and report any wrongdoing.

Intervene promptly when alerted to potential harassment actions.

Assist in the rehabilitation of working relationships when possible.





HEALTH AND SAFETY IN THE WORKPLACE

Our business operations depend on the safety, health and well-being of our staff, our research, and our products. Ensuring a safe environment and appropriate working conditions for our employees is a key element of our Code of Conduct. We follow our safety procedures and promote a culture of safety.

Our efforts to avoid accidents or damage include general safety instructions and supplementary training. In addition to compulsory medical examinations and required vaccinations for laboratory staff, we offer voluntary screening options. These are designed to enable prevention or early detection of visual disturbances, eye diseases, musculoskeletal symptoms and conditions or neurological disorders, for instance. Every employee is empowered to take immediate actions to ensure safety regardless of role, title or responsibility. If you see a situation that could put others at risk, take action! And at all times, in all places, work to keep yourself and your co-workers injury-free.

Having or using alcohol or illegal drugs at work is also prohibited because these can impact your judgment, your performance, and the safety of those who work with you. There may be occasions during which alcoholic drinks are permitted while conducting BioNTech's business, but make sure to comply with all applicable laws (such as those on drinking and driving, and operating machinery) and BioNTech's values and policies. Always exercise both moderation and good judgment.

The scientific and technical conditions in our laboratories are checked and monitored by experts to rule out any biological, chemical, or physical risks or hazards.

At BioNTech, we are fortunate to have a dedicated Safety, Health and Environment team that works directly on behalf of the Management Board to ensure our standards of occupational health, safety and environmental protection, across all of our sites, meet or exceed the standards required by law. Further details on the support this team offers can be found on the intranet.



OUR DUTY TO THE INVESTOR COMMUNITY

Company assets

Patents, trademarks and
copyrights

Confidential and proprietary
information

Social media

Information systems

Accurate books, records
and financial controls

Disclosure commitment
and insider trading

COMPANY ASSETS

BioNTech’s employees are its most important asset. We are vital to BioNTech’s scientific and commercial success. BioNTech relies on us to carry out its vision of making cancer manageable and bringing individualized cancer and other therapies to market. We are also responsible for helping to maintain BioNTech’s strong reputation. To do this, we must fully embrace the importance of complying with all relevant internal and external regulations, and we must maintain a strong sense of ethical responsibility.

BioNTech’s assets include both tangible and intangible assets:

- > Our people
- > Our reputation
- > Our intellectual property
- > Our physical property (buildings, furniture, equipment, etc.)

We are all responsible for safeguarding BioNTech’s assets and reporting any loss, theft, fraud, or misuse.

PATENTS, TRADEMARKS AND COPYRIGHTS

Our intellectual property (IP) is vital to protecting advancements and driving innovation. Our IP includes patents, trademarks and copyrights. At BioNTech, we have generated a strong and diverse patent portfolio with over 130 patent families comprising over 1,000 patent applications that cover our core technologies and key products.

What if?

I am a manager recruiting new employees. I interviewed a candidate who is a senior researcher for one of our competitors. She has extensive experience and knows a lot about our competitor’s product pipeline. Is it ok if I hire her?

- > Yes, we can typically hire from competitors. However, we cannot hire anyone with the expectation that they will share proprietary or confidential information. Additionally, we need to take steps to ensure that we do not improperly elicit, receive or use this information. Unauthorized use of a competitor’s data may damage our own IP position.

What if?

I am at the airport, and I overhear BioNTech employees discussing proprietary Company plans in an airport lounge. Should I do anything?

- > Yes, you should introduce yourself and let them know that they can be overheard. It is everyone’s responsibility to help protect confidential and proprietary information.

CONFIDENTIAL AND PROPRIETARY INFORMATION

In addition to our patents, trademarks and copyrights, BioNTech also has IP in the form of confidential and proprietary information, such as trade secrets. This information can include marketing strategies and plans; sales, marketing, and other corporate databases; sales information; IP plans and strategy; non-public corporate financial information; customer and employee records; manufacturing techniques; and research and data regarding new product development.

In addition to BioNTech’s own proprietary information, we must also maintain the confidential and proprietary information of third parties, including our customers, suppliers and business partners.

What if?

I am speaking to a friend who works at another biotechnology company, and she asks me about my role and what I am working on. How should I respond?

- > Be careful what information you share. You may only disclose publicly available information. Even though she is your friend, BioNTech’s confidential information is not protected if you disclose it to her.

It is everyone’s responsibility to safeguard BioNTech’s IP to ensure that unauthorized disclosure of IP doesn’t damage its value and give an unfair advantage to others outside of BioNTech.



SOCIAL MEDIA

Don't speak on behalf of our Company!

At BioNTech, we aim for nothing less than fundamentally changing the science around cancer treatment. Therefore, our words are powerful, and we need to share information carefully.

What can I do?

> **Refer all media inquiries to the External Communications Department.**

> **When using social media:**

Clearly state that any opinions you have about BioNTech are your own and do not reflect the Company's vision.

Do not disclose confidential information about BioNTech or our partners (may they be HCPs, patients, organizations, vendors or strategic partners).

Don't post anything confidential, discriminatory, or that would be a threat, intimidation, harassment or bullying.

Additionally, the core of our business is highly regulated, and we must ensure the information we share about our Company is consistent, accurate and complete.

Unless you are an authorized spokesperson for BioNTech, do not make any public statements on BioNTech's behalf.

INFORMATION SYSTEMS

BioNTech uses information systems to capture and store a variety of information including study data, patient information, financial records, research and other types of information.

We are responsible for ensuring that these systems are properly utilized and that the data in these systems is properly maintained, taking into consideration applicable privacy laws such as HIPAA, GDPR and others.

- > Treat Company-issued property with the utmost care.
- > Protect all mobile phones, laptops, or other pieces of Company property at all times.

- > Don't visit external websites or use third-party software or apps that are inappropriate, illegal, or not approved by the Company.
- > Follow all policies and procedures for securing your personal devices.
- > Use good judgment if using a Company-issued device for personal reasons. Make sure that your use does not put the Company in a bad position or interfere with your job responsibilities.
- > Inform IT immediately if you suspect you or someone else may have inadvertently put the Company's systems at risk. Actions can be taken to protect the Company if we are quick to act.

What if?

I was contacted by the media around a rumored acquisition. I have heard discussions in the office about the deal, and passing along what I have heard might close the deal. Is it a good idea to tell the reporter what I know?

- > **No. Unless you are an official BioNTech spokesperson, do not answer to reporters, and do not comment on rumors. The information you heard may be incomplete or incorrect or could even constitute insider information, and it is not your role to share it.**

I saw a blog post that's critical of our Company and contains inaccurate information about our innovative science. I know the facts about that product well and want to set the record straight – is it okay for me to reply online?

- > **No. Unless you are an official BioNTech spokesperson, do not comment online about our Company. Notify the Legal or Compliance Department so that the appropriate individual can address the situation.**

ACCURATE BOOKS, RECORDS AND FINANCIAL CONTROLS

Our long-term success is highly dependent on how well we manage our business. Our books and records are here to meet our financial commitments and pay our employees. They are also the basis on which we make important strategic decisions. That is why we need clear, complete and accurate records of our business transactions.

Each BioNTech employee is responsible for following all internal controls in recording and documenting our books and records. We also ask everyone to be alert for any suspicious financial transactions, and for this it is key to know your customers and partners and understand their operations to prevent illegal activity (e.g. money laundering).

Employees of BioNTech are also responsible for knowing and following our Records Management and Records Retention Policies.

DISCLOSURE COMMITMENT AND INSIDER TRADING

At BioNTech, we value transparency and fully comply with all applicable disclosure requirements. Employees of BioNTech are responsible for ensuring that required disclosures are complete and accurate.

Insider trading is prohibited regardless of whether a company is publicly or privately held, and all BioNTech employees, including all managers, officers, and Board members must comply with all relevant laws regarding the prohibition of insider trading.

For more information, please consult our Disclosure and Insider Trading Policies.



OUR DUTY AS CORPORATE CITIZENS

Human rights

Transparency and cooperation

Tax compliance

Treatment of animals

The environment

HUMAN RIGHTS

We respect the rights of every individual and are committed to respecting the employment laws in the markets where we operate.

We comply with the Universal Declaration of Human Rights, the Fundamental Labour Rights as stipulated by the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the 10 UN Global Compact Principles and the UN Guiding Principles on Business and Human Rights ("UNGP").

We avoid causing or contributing to adverse human rights impacts through our own activities, and address such impacts when they occur. We seek to prevent or mitigate adverse human rights impacts that are directly linked to our operations, products or services by our business relationships, even if they have not contributed to those impacts.

We do not partner or conduct business with any individual or company that participates in:

- > forced, bonded or indentured labor or involuntary prison labor
- > the exploitation of children (including child labor)

- > harassment and discrimination
- > harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers or threat of any such treatment
- > human trafficking or any form of modern slavery

We expect our suppliers and partners to:

- > pay workers according to applicable wage laws, including minimum wages, overtime hours and mandated benefits
- > respect the rights of workers, as set forth in local laws, to associate freely, join or not join labor unions, seek representation and join workers' councils
- > protect their workers' health and safety.

We have codified our expectations of suppliers in a Supplier Code of Conduct. It will become part of the contractual basis for future suppliers and is to be agreed successively with existing suppliers.



TRANSPARENCY AND COOPERATION

BioNTech maintains a fair, open and transparent information and communication policy.

We act in a transparent and cooperative manner vis-à-vis investigating and supervisory authorities within the framework of legal obligations and expect in return that the relevant procedural rules are observed in all official activities.

TAX COMPLIANCE

In all countries in which BioNTech is active, it is ensured that it meets its tax obligations in full and on time.

BioNTech ensures effective and risk-oriented monitoring of tax-relevant business processes. The implementation of suitable measures ensures compliance with tax obligations.

In all tax matters, BioNTech cooperates with the relevant tax authorities in a trustworthy and transparent manner.

TREATMENT OF ANIMALS

We are committed to the ethical and respectful treatment of research animals: pain and stress should be minimized. Not only is protecting animal welfare the law, it's also the right thing to do.

All employees involved in developing and conducting animal studies must be properly trained and qualified.

Additionally, all planned animal studies are evaluated to verify necessity and minimize the use of research animals by looking for alternative research methods whenever possible, scientifically valid and acceptable to regulators. In addition to complying with all relevant laws, we abide by the principals of the 3Rs (Replacement, Reduction and Refinement) and the European Commission's Ethics for Researchers guideline.

THE ENVIRONMENT

We act in an environmentally responsible manner and avoid the use of hazardous substances wherever possible. Compliance with all applicable environmental regulations is a matter of course for us.

FURTHER INFORMATION AND REMINDERS

POLICIES AND GUIDANCE

All policies and guidance documents referenced in this Code of Conduct can be obtained by contacting the Legal or Compliance Department and in time will be made available on the intranet.

HELP AND ADVICE

If you have any questions regarding the information covered in this Code of Conduct including how to report violations of this Code of Conduct, contact your Manager, the Compliance Department, or the reporting line as detailed on page 13.

SPEAK UP

At BioNTech, we expect all employees to uphold responsible, lawful and ethical standards in all that you do. If you have a good faith belief that someone has done, is doing, or may be about to do something that violates this Code of Conduct, speak up by using the available channels outlined above.

What can I do?

- > **Treat others with respect and dignity.**
- > **Follow employment laws where you work.**
- > **Be alert to abuses.**
- > **Speak up if you see or suspect possible labor law or human rights violations.**





BIONTECH

BioNTech SE

An der Goldgrube 12

55131 Mainz

Germany

Phone: +49 6131 9084-0

Fax: +49 6131 9084-390

Email: info@biontech.de

www.biontech.de