

## BioNTech SE

### Modern Slavery Statement for the financial year ending 31 December 2024

#### 1. Introduction

- 2.1 This Statement is made in relation to the UK Modern Slavery Act 2015 (the “**2015 Act**”) and outlines the steps, BioNTech SE has taken in the Fiscal Year 2024 to prevent modern slavery and human trafficking in its business and supply chain.

BioNTech SE is committed to preventing modern slavery and human trafficking in its business and supply chains, and those of its subsidiaries. In the UK, BioNTech SE has two UK subsidiaries - BioNTech UK Limited and InstaDeep Ltd (“**InstaDeep**”).

This Statement applies to BioNTech SE and its subsidiaries (together, “**BioNTech**” or the “**Company**”).

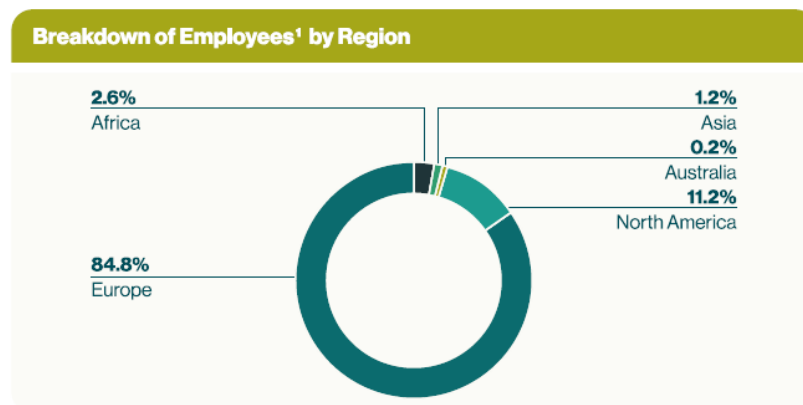
#### 3. Our Organization and Business

- 3.1 BioNTech is a global next-generation immunotherapy company pioneering novel medicines against cancer, infectious diseases and other serious diseases. Since our founding in 2008, we have focused on harnessing the power of the immune system to address human diseases with unmet medical need and major global health burden. Our fully integrated model combines decades of research in immunology, translational drug discovery and development, a technology agnostic innovation engine, GMP manufacturing, and commercial capabilities to rapidly discover, develop and commercialize our marketed products and other candidate vaccines and therapies.

- 3.2 BioNTech SE is the parent company of the BioNTech Group and American Depositary Shares, each representing one of BioNTech SE’s ordinary shares (ADSs) are listed on the Nasdaq Global Select Market under the symbol “BNTX”.

BioNTech is headquartered in Mainz, Germany and runs additional operations in sites in Germany as well as in Europe, Africa, Asia, Australia and North America.

#### Employees by region in Fiscal Year 2024



<sup>1</sup> Excluding the Management Board, trainees and interns. Employee data may differ from the employee figures in BioNTech's financial statements due to definitions specific to the sustainability reporting standards used for BioNTech's sustainability reports. Unless stated otherwise, employee data reflects headcount information for the entire BioNTech Group as of December 31 of the reporting year. For detailed information, see → page 91.

Source: BioNTech Sustainability Report 2024

Further information on BioNTech’s organization, business and shareholdings is published in the [2024 Annual Report](#).

## 4. Our Supply Chains

- 4.1 To successfully bring personalized immunotherapies and vaccines to people around the world, we believe it is crucial to have in-house manufacturing capabilities. We have manufacturing sites capable of developing fully automated production processes for on-demand production of our investigational therapies and vaccines and our approved COVID-19 vaccines. In addition, we have developed a shippable, modular and turnkey mRNA manufacturing facility, called BioNTainer, which is designed to support a decentralized and scalable vaccine production network that can address local needs.
- 4.2 BioNTech operates in jurisdictions mostly rated favourably in the [Corruption Perceptions Index](#). However, as an international biopharmaceutical company, BioNTech's direct supply chains can be complex. The bulk of goods and services are purchased by our BioNTech Global Procurement Organisation; supported and monitored by our BioNTech Product Supply department. These include raw materials used to manufacture our authorized products and investigational therapies and vaccines candidates. There are also supply chains for the equipment, packaging materials and services that are necessary to run the complex product and product candidate supply process.
- 4.3 When engaging with suppliers, BioNTech takes a risk-based approach to due diligence. In certain jurisdictions and for certain types of business relationships that we consider to be associated with increased risks, we undertake compliance due diligence before committing to engage with a supplier. We apply certain transparent criteria for this assessment, e.g., the annual Corruptions Perception Index issued by Transparency International. This process was in place throughout 2024.
- 4.4 We also require in our [Supplier Code of Conduct](#) that suppliers comply with applicable law and regulations (which includes applicable anti-slavery and human trafficking law). It includes an explicit requirement that suppliers act in accordance with generally accepted principles and standards regarding social and environmental responsibility and internationally recognized human rights, including legislation in place to prevent modern slavery. The Supplier Code of Conduct is integral part of BioNTech's Terms & Conditions; and must be accepted before entering a contractual partnership with BioNTech. The Supplier Code of Conduct was in place throughout 2024.

## 5. Our Policies and Procedures

- 5.1 To ensure a comprehensive approach to human rights in our business and supply chain, BioNTech developed its strategies and commitments based on the following leading standards:
- (a) The International Bill of Human Rights (Universal Declaration of Human Rights (International Covenant on Civil and Political Rights, International Covenant on Economic, Social and Cultural Rights),
  - (b) The UN Guiding Principles on Business and Human Rights,
  - (c) The International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.

Additionally, BioNTech is a signatory to the UN Global Compact, an initiative based on ten principles in the areas of human rights, labour, environment, and anti-corruption.

- 5.2 Human rights strategies and commitments are stated in the publicly available [Human Rights Statement](#). The statement has been in place since 2023 and is updated annually.
- 5.3 Since 2019, BioNTech has had the [Code of Ethics & Business Integrity](#) (the "Code") in place. The Code was revised in 2024 to reflect BioNTech's expansion and developments in different countries. All BioNTech employees including management board members are required to

comply with the Code and the supporting policies and guidelines, as well as the laws and regulations of the countries where BioNTech is active. This includes complying with applicable anti-slavery and human trafficking laws.

- 5.4 The Code specifies that responsible, lawful and ethical behaviour is a fundamental prerequisite for achieving BioNTech's scientific and commercial objectives – whether in the laboratory, when dealing with colleagues, collaborators and business associates, or in contact with Healthcare Professionals and patients. Acting with integrity is non-negotiable for BioNTech.
- 5.5 We believe that ethical behaviour is the foundation of our success in achieving our business objectives and we recognise that it is in our best interest to set high standards for ourselves at all times, including not engaging in modern slavery or human trafficking, and to align ourselves with agents, representatives, suppliers and partners who have similarly high standards of business conduct.
- 5.6 In case of a substantiated concern that includes a breach of policies or procedures, BioNTech defines appropriate mitigating or remedial measures. Actions to end the misconduct could include e.g. disciplinary measures, contract measures and procedural adjustments – depending on the seriousness of the violation – and are described in BioNTech's Corporate Rules Policy. No breaches of policy or procedure relating to potential modern slavery or human trafficking were identified in 2024.

## **6. Organizational Roles and Responsibilities in the Human Rights Risk Management**

Human rights risk management and compliance with human rights due diligence obligations is overseen by the Human Rights Officer (HRO). He or she reports directly to the Chief Operating Officer and provides the Management Board with a "Report of the Human Rights Officer" at least annually. The HRO sets out the human rights agenda, supervises the human rights risk management including risk analysis, preventive and remedial measures; manages reports and compliance within the compliance grievance process for human rights-related incidents, is accountable for documentation and reporting and, assesses the effectiveness of measures. In this role, the HRO supports and advises Risk Owners and Subject Matter Experts in the business areas with their responsibilities to ensure and respect human rights in own business operations and in the supply chain. Adequate staff support and a budget is available to the HRO.

## **7. Human Rights Due Diligence Process**

### **7.1 Risk identification**

BioNTech performs a regular risk analysis to identify potential and actual human rights and environment-related risks and incidents early on and to work on preventing and mitigating them accordingly. The risk analysis is conducted annually and if necessary, on an ad-hoc basis to evaluate potential risks in the event of significant changes to the Company's operations or business relationships, or when specific concerns related to human rights and environmental risks arise. The same applies for the Fiscal Year 2024.

For its own operations, BioNTech has conducted risk assessments on both abstract and concrete levels, incorporating information from external experts and internal sources. In the context of the supply chain, the risk assessment has been based on country-specific and sector-specific risk data.

## 7.2 Risk Assessment

In 2024, BioNTech carried out its second human rights risk analysis encompassing its own operations and direct suppliers. The analysis was the basis for the definition of the relevant human rights topics as stated in the [Human Rights Statement](#). Through this process, BioNTech takes the appropriate preventive measures to address the risks identified.

BioNTech is not aware of any slavery or human trafficking issues within its business or supply chains during 2024. In the 2024 financial year, no potential incidents of this type were identified or reported through internal reporting channels, audit processes, whistleblowing or otherwise.

We believe that adherence to, and compliance with, our policies and procedures, including the Code, should reduce the risks of modern slavery occurring in our business or supply chains.

On this basis, we consider the risk of slavery or human trafficking for BioNTech in its business and its supply chain as rather low. However, we recognise that the international nature of our business operations may give rise to modern slavery risks, and the consequent need to keep those risks and controls under review. Therefore, and as BioNTech is committed to preventing slavery or human trafficking in its business and supply chains, the potential risk of forced labour in the supply chain has been prioritised. Thus, should any potential issue be identified, BioNTech will act swiftly to investigate and, where appropriate, take responsive actions.

## 7.3 Preventive and Remedial Measures

Relevant preventive measures are taken as part of standard operating processes, particularly in the areas of Safety, Health & Environment and Clinical Studies. BioNTech monitors and assesses existing measures and adapts where necessary, based on its risk analysis findings and a risk-based approach.

Identified risks and violations are carefully weighed, reviewed, and prioritized to derive the appropriate engagement level and course of action. BioNTech prioritizes the implementation of effective and appropriate remedial actions to prevent, address, or minimize the effects of potential adverse impacts or violations.

## 7.4 Grievance mechanism

BioNTech strives to identify and mitigate risks both in its own operations and throughout its supply chain. The Company encourages all internal and external stakeholders to report to BioNTech any concerns or potential risks regarding human rights, environmental practices, products, corruption, etc. In accordance with the Company's *Speak-Up Policy*, these concerns are reported and handed to the responsible department, or the Human Rights Officer may be contacted directly. Concerns can be reported (anonymously) through BioNTech's whistleblowing tool, *Ethics Contact Point*. The Ethics Contact Point is open to the public worldwide, 24 hours a day, 7 days a week. [The Rules of Procedure](#) for handling concerns are published on the company's website. BioNTech is committed to protecting any person who raises his/her concern on reasonable grounds, regardless of which reporting channel was utilized.

## 8. Training

BioNTech's ethics and compliance policies e.g. the Code, are trained through repeated exercises and thorough explanations in mandatory interactive virtual training, online videos, awareness training and on-site training. Furthermore, BioNTech provides training on the policies applicable to staff roles. Specific to the Human Rights Risk Management, the responsible employees receive appropriate training and are advised and supported by internal and external human rights experts. The same applies for the Fiscal Year 2024.

**9. Current and Future Further Actions**

9.1 BioNTech commits to continuously enhance and adapt its human rights risk assessment and to monitor its effectiveness. In addition to the further establishment of corresponding formal governance structures, the further incorporation of human rights risk management processes into BioNTech’s Enterprise Risk Management was a priority in 2024.

BioNTech is committed to avoid causing or contributing to adverse human rights impacts, be it in its own operations or in its business relationships with others. Thus, BioNTech has integrated human rights and environmental expectations for suppliers into its procurement process. In 2024, the Global Procurement Department focused on the further development and implementation of an internal ESG score in the supplier selection process and a comprehensive update of the Supplier Code of Conduct. The Supplier Code of Conduct is integral part of BioNTech’s Terms & Conditions.

9.2 To document compliance with existing human rights regulations and to identify areas of improvements, an extensive internal audit of BioNTech’s Human Rights Risk Management was conducted in 2024. Measures suggested have been integrated in the human rights agenda and roadmap 2025.


**10. Approval of this statement**

10.1 This statement was approved by the Management Board of BioNTech SE on October 29, 2025.

10.2 This statement was signed by Dr Sierk Poetting, Chief Operating Officer and Management Board Member of BioNTech SE on Nov-14-2025 and by Ramón Zapata-Gomez, Chief Financial Officer and Management Board Member of BioNTech SE on Nov-14-2025 :

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Dr Sierk Poetting

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Ramón Zapata-Gomez