

BioNTech SE

Transparency in Supply Chain Statement for the financial year ending 31 December 2022

1. Introduction

- 1.1 BioNTech SE is committed to preventing modern slavery and human trafficking in its business and supply chains, and those of its subsidiaries.
- 1.2 In accordance with its obligation under the Modern Slavery Act 2015 (the “**2015 Act**”), BioNTech SE sets out below a statement of the steps taken in the 2022 financial year to ensure slavery and human trafficking is not taking place in any part of BioNTech's business or in any of its supply chains.
- 1.3 BioNTech SE has a UK subsidiary, BioNTech UK Limited. BioNTech UK Limited does not meet the criteria which would trigger the obligation to make an annual modern slavery statement pursuant to s.54 of the 2015 Act. However, this statement includes actions taken in respect of BioNTech SE and its subsidiaries, including BioNTech UK Limited (together “**BioNTech**”).

2. Our business

- 2.1 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.
- 2.2 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 multiple other sites in Germany, including Idar-Oberstein, Marburg, Martinsried, Neuried, Halle and Berlin. It has further research locations in Cambridge, Massachusetts (BioNTech's North American headquarters) and Gaithersburg, Maryland. In addition, BioNTech has operations in the UK, Australia, Israel, Singapore, Mainland China, Austria, Turkey and Rwanda.

3. Our supply chains

- 3.1 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.
- 3.2 BioNTech operates in jurisdictions mostly rated favourably in the [Corruption Perceptions Index](#). However, as an international medical sciences company, BioNTech's direct supply chains can be complex. The bulk of goods and services are supported and monitored by our BioNTech Product Supply department. These include raw materials used to manufacture our authorized products and investigational 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.

- 3.3 When engaging with suppliers, BioNTech takes a risk assessment-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 2022.
- 3.4 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. Our Supplier Code of Conduct principles are based primarily on the Pharmaceutical Industry Principles for Responsible Supply Chain Management of the Pharmaceutical Supply Chain Initiative (“PSCI”). The Supplier Code of Conduct was in place throughout 2022. In 2022, we started a review process of the Supplier Code of Conduct .
- 3.5 In accordance with our Supplier Code of Conduct, BioNTech does not partner or conduct business with any individual or company that participates in:
- (a) Forced, bonded or indentured labour or involuntary prison labour;
 - (b) The exploitation of children (including child labour as defined in the ILO Convention No. 138 on minimum age and the ILO Convention No.182 on the Worst Forms of Child Labour);
 - (c) Harassment or discrimination;
 - (d) Harsh or inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers or the threat of any such treatment; or
 - (e) Human trafficking or any other form of modern slavery.
- 3.6 BioNTech expects suppliers and partners to:
- (a) Pay workers according to applicable wage laws, including minimum wage, overtime and mandatory benefits;
 - (b) Respect the rights of workers in compliance with local laws to associate freely, to join or not join labour unions, to seek representation, and to join workers' councils; and
 - (c) Protect the workers' health and safety.

4. Our controls

4.1 Policies and procedures

- (a) 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: the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the UN International Covenant on Economic, Social and Cultural Rights, the 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 principles in the areas of human rights, labour, environment, and anti-corruption.

- (b) BioNTech had a Code of Business Conduct & Ethics ("**the Code**") in place throughout 2022, and it remains in force. All staff 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.
- (c) 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 doctors and patients. Acting with integrity is non-negotiable for BioNTech.
- (d) 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.

4.2 Training

- (a) We provide training on the policies applicable to staff roles.

4.3 Breach of Policies

- (a) BioNTech has a disciplinary procedure in place should potential breaches of policies or procedures be identified, and individuals are subject to disciplinary measures up to and including termination of employment with BioNTech. No breaches of policy or procedure relating to potential modern slavery or human trafficking were identified in 2022.

4.4 Reporting processes

- (a) 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, or related issues. These concerns may be reported to and handled by the responsible employee or department, or the human rights representative may be contacted directly. Additionally, concerns can be reported anonymously through the BioNTech's whistleblowing tool, the "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, in accordance with applicable law. The Ethics Contact Point offers reporting of concerns, including those relating to modern slavery. Reports can be made either via phone hotline or online via web intake (both anonymously, if preferred). The Ethics Contact Point is globally available twenty-four hours a day/seven days a week.
- (b) BioNTech takes every report seriously and confidentially. Furthermore, BioNTech assures that the reporting person remains protected against any kind of retaliation, regardless of which reporting channel is utilized.

5. Risk assessment and due diligence

- 5.1 BioNTech is not aware of any slavery or human trafficking issues within its business or supply chains during 2022. In the 2022 financial year, no potential issues of this type were identified or reported through internal reporting channels, audit processes, whistleblowing or otherwise.
- 5.2 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.

5.3 On this basis, we consider the risk of slavery or human trafficking for BioNTech in its business and its supply chain continues to be 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. BioNTech is committed to preventing slavery or human trafficking in its business and supply chains. As such, should any potential issue be identified, BioNTech will act swiftly to investigate and, where appropriate, take responsive actions.

6. Current and future further actions

6.1 In 2022, a human rights and environmental due diligence gap analysis was carried out for the Company, together with the relevant internal stakeholders. The purpose of the analysis was to assess the current due diligence approaches in place and identify any potential gaps in preparation for 2023. Initial action plans to strengthen human rights due diligence were developed and agreed with project managers and responsible executives. On this basis, BioNTech will proactively consider what further steps could be taken in 2023 to ensure modern slavery and human trafficking is not occurring in its business and supply chains.

- (a) **Policy:** An internal Human Rights Policy and a public Human Rights Policy Statement 2023 were prepared in accordance with Section 6 (2) of the German Supply Chain Act (*Lieferkettensorgfaltspflichtengesetz, "LkSG"*) in 2022, approved by the Management Board, and published on BioNTech's website on 30 December 2022. The Human Rights Policy is supplemented by BioNTech's human rights commitments contained in its Code of Business Conduct and Ethics and by its Supplier Code of Conduct.
- (b) **Supplier Commitments:** Adequate preventive measures with regard to due diligence in BioNTech's supply chain were defined in the fourth quarter of 2022. An appropriate risk analysis for the supply chain will be carried out in 2023. Furthermore, a revision of the Supplier Code of Conduct and the implementation of a digital supply chain platform in Procurement is planned. This solution maps a comprehensive spectrum of sustainability risk management, providing our Procurement team with screening and mapping of supply chain risks, scorecards with actionable ratings, and improvement management. BioNTech is aware that digital solutions should be seen as just one of many measures and do not relieve the Company of its responsibility within its own operations and supply chain. **Risk identification:** BioNTech commits to performing a proactive risk analysis, to identifying potential human rights and environment-related risks and incidents early on, and to timely mitigating actual human rights and environment-related risks and incidents. The risk analysis will be deployed globally as well as in each country in which BioNTech operates, updated annually to evaluate potential risks in case of significant changes to BioNTech's operations or business relationships. BioNTech is also implementing ad-hoc risk assessments as necessary, based on human rights and environmental risk concerns.
- (c) **Reporting:** BioNTech intends to annually publish a 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, we intend to take measures to prevent, mitigate or remedy identified potential or actual risks or violations. Going forward, BioNTech intends to continue to refine and adapt the assessment and resulting measures while assessing impact and effectiveness. All documents on the fulfilment of BioNTech's due diligence obligations will be stored for a period of at least seven years.
- (d) **Governance:** The human rights risk management on the compliance with human rights due diligence obligations will be overseen by the Human Rights Officer ("HRO"), reporting to the Management Board at least annually in accordance with LkSG. 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.

7. **Approval of this statement**

7.1 This statement was approved by the Management Board of BioNTech SE on 3 December 2023.

7.2 This statement was signed by Dr Sierk Poetting, Chief Operating Officer and Management Board Member of BioNTech SE on December 22, 2023:

Signed: