



MODERN SLAVERY STATEMENT

FOR THE FINANCIAL YEAR ENDING 31 DECEMBER 2025

Modern Slavery Act Statement

1. Introduction

- 1.1. This UK Modern Slavery Act 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 ending 31 December 2025 to assess and prevent modern slavery in its business and supply chain.
- 1.2. This Statement applies to BioNTech SE and its subsidiaries (together, “BioNTech”, the “Company”, or the “BioNTech Group”) and is also made on behalf of BioNTech’s subsidiaries incorporated in the UK within the BioNTech Group. In the UK, BioNTech SE has two wholly owned subsidiaries - BioNTech UK Limited (“BioNTech UK”) and InstaDeep Ltd. (“InstaDeep”). This Statement focuses on BioNTech SE’s UK subsidiaries; however, the requirements regarding ethics and modern slavery also apply to the BioNTech Group.
- 1.3. This Statement is annually reviewed and adapted if necessary. Every version of this Statement is approved by the Management Board of BioNTech SE. BioNTech engages internally and externally to raise awareness of and ensure compliance with its policies. The Modern Slavery Statement has been developed in close alignment with the Procurement Excellence team within BioNTech’s Global Procurement Organization, responsible for BioNTech’s global supplier due diligence, the Human Resources team, and InstaDeep Representatives.

2. BioNTech Business Structure

- 2.1. BioNTech is a global next-generation biopharmaceutical company pioneering novel investigative therapies for cancer and other serious diseases. Since its founding in 2008, BioNTech has focused on harnessing the power of the immune system to address human diseases with unmet medical needs 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, manufacturing that follows Good Manufacturing Practice (GMP), and commercial capabilities to rapidly discover, develop and commercialise 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 (ADSs), each representing one of BioNTech SE’s ordinary shares, are listed on the Nasdaq Global Select Market under the symbol “BNTX”.

BioNTech is headquartered in Mainz, Germany and runs additional operations at sites in Germany as well as elsewhere in the EU, the UK, Africa, Asia, Australia and the USA. As of 31 December 2025, BioNTech employed more than 8,000 people, of whom approximately 80% were based in Europe.

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BioNTech's company sites cover activities ranging from research and development to manufacturing and supporting commercial and operational functions.

Further information on BioNTech's organisation, business and shareholdings is published in the [2025 Annual Report](#).

- 2.3. In the reporting year, BioNTech procured goods and services from more than 5,000 suppliers worldwide, of which 4% were linked to InstaDeep and BioNTech UK. The majority of goods and services are procured by BioNTech's Global Procurement Organization, which is structured into seven procurement categories: Clinical Services, Indirect Procurement, IT, Program and Production, R&D and Quality, Technical Procurement, and Procurement Excellence and Operations.

Purchased products and goods include raw materials used to manufacture our authorized products, investigational therapies and vaccines candidates and the equipment, packaging materials and services that are necessary to run the complex product and product candidate supply process. Among the goods and services most frequently purchased by InstaDeep – a technology company in the area of Artificial Intelligence (AI) and Machine Learning (ML) – are goods and services with a focus on technology and science.

3. BioNTech Commitments and Policies

- 3.1. BioNTech covers modern slavery as part of its overall human rights risk management and due diligence approach. The Company therefore develops its strategies and commitments based on the following leading standards, among others:

- The *International Bill of Human Rights* – the *Universal Declaration of Human Rights* with the two Covenants (the *International Covenant on Civil and Political Rights* and the *International Covenant on Economic, Social and Cultural Rights*),
- The *UN Guiding Principles on Business and Human Rights*,
- The *International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work*, and
- The *OECD Guidelines for Multinational Enterprises on Responsible Business Conduct*.

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. As part of its commitment to ethical and responsible business practices, BioNTech strives to align its operations with these international principles and standards.

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Human Rights at BioNTech are guided by the values and expectations stated in the [Code of Ethics & Business Integrity](#) and the [Supplier Code of Conduct](#) that is applicable to most of the Company's cooperation and business partners.

BioNTech's human rights strategy, including the risk of modern slavery, is stated in the publicly available [Human Rights Statement](#). This statement is updated annually.

3.2. BioNTech does not tolerate any form of modern slavery including servitude, forced labour, involuntary prison labour, human trafficking or child labour – and aims to align itself with agents, representatives, suppliers and partners who have similarly high standards of business conduct. As anchored in BioNTech's Supplier Code of Conduct, the Company expects its suppliers and business partners among others to:

1. Not accept child labour in any form and in accordance with the provisions of the ILO Core Labor Standards as well as relevant laws.
2. Ensure fair working conditions and refrain from any form of unethical or illegal working conditions, e.g., harsh and inhumane treatment, sexual harassment, sexual abuse, physical punishment, mental or physical coercion or verbal abuse, any form of slavery, servitude, involuntary prison labour, forced or compulsory labour or human trafficking.
3. Ensure workers do not pay any recruitment fees, deposits or similar to secure a job or to receive training, tools, or personal protective equipment necessary to safely carry out their jobs.
4. Ensure workers are not required to hand over identity or other legal documents nor personal valuables, such as wedding rings, etc. If they are required to do so by law, workers should always have access to their documents.
5. Ensure workers can freely leave their place of work or worker accommodation.
6. Ensure that the wages of workers and sub-contractors meet or exceed the legal minimum standards or appropriate prevailing industry standards, whichever are higher.
7. Ensure the implementation and adherence to compensation terms established by legally binding collective bargaining agreements and that all workers are provided with the applicable terms and conditions of employment in writing in accordance with local legislation.

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8. Ensure that working hours, holidays and absences of workers and subcontractors respect the laws of the jurisdiction where the workers are employed. All overtime work by workers is on a voluntary basis. Processes and guidelines are in place for recording working time.
 9. Ensure the employees' right to rest is respected and working hours per day/week are limited with an adequate recovery time.
- 3.3. Furthermore, BioNTech expects its suppliers and business partners to provide contractual assurances that they will comply with BioNTech's requirements set out in the [Supplier Code of Conduct](#). This is confirmed through acceptance of BioNTech's Terms and Conditions and an explicit commitment. The Supplier Code of Conduct forms an integral part of BioNTech's Terms and Conditions.

As stated in BioNTech's [Supplier Code of Conduct](#), the Company expects its suppliers and business partners to strive continuously to implement and maintain the highest standards of ethical conduct in their own business operations and in relationships with business partners. Detailed information on BioNTech's supplier engagement process and procurement standards is published on the corporate supplier website: <https://www.biontech.com/int/en/home/supplier.html>.

4. Governance

- 4.1. The ultimate responsibility for compliance with human rights obligations, including those related to modern slavery, across BioNTech's own operations and supply chain lies with the Management Board of BioNTech SE.
- 4.2. BioNTech's Human Rights Officers (HROs) appointed by the Management Board of BioNTech SE for the BioNTech Group, oversee the Company's human rights and environmental risk management as well as compliance with human rights due diligence obligations. This includes the risk of modern slavery. In their role, the HROs report directly to the Chief Operating Officer and provide the Management Board with a report at least annually.

At BioNTech, Human Resources is the nominated risk owner for modern slavery in its own operations. The risk of modern slavery in the supply chain is managed by the Procurement Excellence team within the Global Procurement Organization. To strengthen and further develop BioNTech's human rights risk management, the HROs support the risk owners and the teams involved with expertise, guidance and resources.

- 4.3. The implementation of measures with the aim of preventing and minimizing the risk of modern slavery as part of BioNTech's human rights strategy spans across, among others, Corporate

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Sustainability & Responsibility, Global Procurement, Human Resources, Legal, Business Site Services, including Site Development, and Compliance & Business Ethics.

- 4.4. The effectiveness of BioNTech's human rights risk management and due diligence processes is reviewed annually and, on an ad-hoc basis, in light of upcoming or changing regulatory developments. This includes BioNTech's efforts to assess and prevent modern slavery in its business and supply chain.

5. Due Diligence Process

BioNTech's approach to identifying and addressing actual or potential modern slavery impacts across its own operations and supply chain is designed to meet the requirements of applicable regulatory and legal frameworks, including the UK Modern Slavery Act. This includes implementing appropriate due diligence measures with the aim of preventing or minimizing any modern slavery risks or of ending activities that may cause or contribute to adverse impact related to modern slavery.

5.1. Risk Assessment Process

BioNTech performs a regular proactive risk assessment to identify potential and actual human rights and environment-related risks and incidents and to work on preventing, mitigating and remediating them accordingly. The risk of modern slavery is assessed as part of BioNTech's overall human rights risk assessment. The risk analysis is conducted annually and, if necessary, on an ad-hoc basis to evaluate 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.

BioNTech applies a risk-based, two-step approach for assessing risks in own operations and direct suppliers. Risk assessments related to indirect suppliers are performed on an ad-hoc basis.

For its own operations, BioNTech conducts its risk assessment first at an abstract level, using information from external and internal sources such as recognised external indicators, e.g., the Global Slavery Index and the UNICEF Children's Rights in the Workplace Index, grievances received and internal Company data. Based on the abstract risk assessment, risk areas are evaluated on a concrete level. The risk assessment process for modern slavery-related aspects in BioNTech's own operations is steered and coordinated by Global Human Resources, closely involving the representatives of BioNTech UK and InstaDeep, and incorporates the expertise and knowledge of BioNTech representatives in the regions and markets, where feasible. The assessment considers the severity and likelihood of forced and child labour, existing preventive and remedial measures, and their effectiveness.

The supplier risk assessment is led by the Procurement Excellence team at BioNTech Global

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Procurement, incorporating insights from Procurement Category Managers and BioNTech markets. For its supplier risk assessment, BioNTech uses an IT-tool based risk assessment approach. It combines an abstract risk assessment based on recognised external indicators for country and industry risks, such as the Global Slavery Index, the UNICEF Children's Rights in the Workplace Index, Business and the Human Rights Resource Centre, at the supplier level with a concrete supplier risk assessment applying defined prioritisation criteria. In the concrete assessment, BioNTech uses supplier self-assessments through relevant questionnaires, for e.g., on working conditions, including forced labour and child labour.

In certain jurisdictions and certain types of business relationships that BioNTech considers to be associated with increased risks, compliance due diligence is carried out before committing to engage with a supplier.

BioNTech is aware that its global supply chain as well as its international business operations include certain countries with an elevated country risk of modern slavery. Based on the results of the annual human rights and environmental risk assessment in the reporting year, the potential risks of "child labour" and "forced labour" in the supply chain were identified and continue to be monitored. In the respective reporting year, no complaints were reported, and no incidents were identified through internal reporting channels, audit processes, whistleblowing, or otherwise that relate to modern slavery.

5.2. Preventive and Remedial Measures

BioNTech seeks to conduct its business with care and respect for people and the environment, as governed by the [Code of Ethics & Business Integrity](#), [Supplier Code of Conduct](#), and other internal policies, procedures and guidelines such as the BioNTech Compliance Due Diligence Guideline for Third Parties and BioNTech's Procurement Policy.

These BioNTech-specific ethical business conduct obligations apply to both BioNTech's operations and business partner relationships. They are implemented through standard operating procedures, training, upskilling, and reviews to facilitate understanding and compliance among BioNTech representatives and business partners. In the 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, for example, disciplinary measures, contract measures and procedural adjustments – depending on the seriousness of the violation – and are described in BioNTech's internal Corporate Rules Policy.

BioNTech uses an internal "Supplier ESG Score" for proactive supplier risk management in its tendering and procurement processes. The "ESG Score" also covers the risks of forced labour and child labour and must be taken into consideration in supplier selection.

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5.3. Training

BioNTech provides training on policies applicable to the roles of BioNTech representatives. Employees involved in human rights and environmental risk management receive appropriate training. Knowledge building is fostered by, e.g., thematic awareness-raising sessions and training on the IT-tool in use for supply chain due diligence. In addition, responsible BioNTech representatives are advised and supported by internal and external human rights experts. Global Procurement representatives have also been trained and advised in the application of the “Supplier ESG Score”.

6. Grievance mechanism

BioNTech encourages all internal and external stakeholders to report to the Company any concerns related to modern slavery. In accordance with the Company’s SpeakUp Policy, these concerns may be reported to the employee or department responsible, or the HROs may be contacted [directly](#).

Concerns can also 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 their concern on reasonable grounds, regardless of which reporting channel was utilised.

7. Current and Future Further Actions

BioNTech commits to continuously enhance and adapt its human rights risk assessment and to monitor its effectiveness.

In the 2025 financial year, BioNTech appointed an additional HRO to reinforce the Company’s human rights and environmental risk governance framework. This prompted a review and further refinement of our internal work processes, roles, and responsibilities. In addition, one of the strategic priorities in 2025 was the evaluation of the portfolio of current and planned preventive, mitigating, and remedial measures. With regards to training, new colleagues and selected suppliers in Australia were invited for an awareness raising webinar on modern slavery. Moreover, awareness raising sessions with a focus on sustainability due diligence in China were offered to relevant BioNTech representatives with the aim of familiarizing them with country-specifics.

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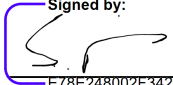
In 2026, BioNTech's human rights strategy plans to focus on the following aspects relating to modern slavery:

- Fostering a better understanding and identification of signs of the risk of modern slavery in BioNTech's value chain
- Strengthening awareness of the risk of modern slavery and its indicators through dedicated training for BioNTech representatives

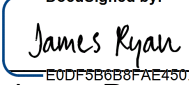
8. Approval of this statement

This statement was approved by the Management Board of BioNTech SE on Jul-31-2026.

This statement was signed on behalf of BioNTech SE and its UK subsidiaries BioNTech UK Limited and InstaDeep Ltd. by:

Signed by: 
Signature: _____ Date: Jul-27-2026
Name: Dr. Sierk Poetting,
Title: Chief Operating Officer and Management Board Member of BioNTech SE, Director of BioNTech UK and Director of InstaDeep

Signed by: 
Signature: _____ Date: Jul-31-2026
Name: Ramon Zapata Gomez
Title: Chief Financial Officer and Management Board Member of BioNTech SE and Director of InstaDeep

DocuSigned by: 
Signature: _____ Date: Jul-28-2026
Name: Dr. James Ryan
Title: Chief Legal and Chief Business Officer and Management Board Member of BioNTech SE and Director of BioNTech UK