

## BioNTech SE

### Transparency in Supply Chain Statement for the financial year ending 31 December 2023

#### 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 2023 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 two UK subsidiaries, BioNTech UK Limited and InstaDeep Ltd (“**InstaDeep**”). Neither BioNTech UK Limited nor InstaDeep Ltd independently meets 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 (together, “**BioNTech**” or the “**Company**”).

#### 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 locations in the United States, including Cambridge, Massachusetts (BioNTech's North American headquarters) and Gaithersburg, Maryland. In addition, BioNTech has operations in Australia, Austria, France, Israel, Luxembourg, Mainland China, Nigeria, Rwanda, Senegal, Singapore, South Africa, Spain, Switzerland, Taiwan, Tunisia, Turkey, the UAE and the UK.

#### 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 2023.
- 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. The Supplier Code of Conduct was in place throughout 2023. In 2022, we started a review process of the Supplier Code of Conduct that continued in 2023.

#### **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) Human rights strategies and commitments are stated in the publicly available [Human Rights Statement](#) which is updated annually. The statement was in place throughout 2023.
- (c) BioNTech had a [Code of Business Conduct & Ethics](#) ("**the Code**") in place throughout 2023, 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.
- (d) 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.
- (e) 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

We provide training on the policies applicable to staff roles.

#### 4.3 Breach of Policies

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 2023.

### 5. Human rights due diligence

#### 5.1 Risk identification

BioNTech performs a regular proactive 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. 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.

#### 5.2 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 employee or department, or the human rights representative 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. BioNTech is committed to protecting any person who raises his/her concern on reasonable grounds, regardless of which reporting channel was utilized.

#### 5.3 Preventive 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, in particular based on its risk analysis findings. Furthermore, the company is strengthening all its business functions related to human rights by providing adequate resources. The responsible employees receive appropriate training and are advised and supported by internal and external human rights experts.

#### 5.4 Remedy

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.

### 6. Risk assessment

#### 6.1 BioNTech is not aware of any slavery or human trafficking issues within its business or supply chains during 2023. In the 2023 financial year, no potential issues of this type were identified or reported through internal reporting channels, audit processes, whistleblowing or otherwise.

6.2 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.

6.3 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.

## **7. Roles and responsibilities**

7.1 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 at least annually. 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. Nominated Risk Owners perform risk management for specific risk topics, supported and consulted by the HRO.

## **8. Current and future further actions**

8.1 In 2023, BioNTech carried out its first 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.

8.2 With the completion of BioNTech's acquisition of InstaDeep, a leading global technology company in the field of artificial intelligence and machine learning, on July 31, 2023, an ad-hoc human rights risk analysis for InstaDeep was triggered and executed. The results are being addressed as part of the further integration of InstaDeep into the BioNTech Group.

8.3 BioNTech plans to continuously enhance and adapt its human rights risk assessment and monitor its effectiveness. A focus of the human rights management process in 2023 was the discussion and preparation for integrating human rights risks into BioNTech's Enterprise Risk Management. Further integration and the establishment of corresponding formal governance structures will continue in 2024.

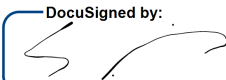
8.4 BioNTech is committed to avoid causing or contributing to adverse human rights impacts, be it in its own operations or in its business relationships with others. BioNTech has integrated human rights and environmental expectations for suppliers into its procurement process. The results of the risk analysis will be used to further strengthen the process using a risk-based approach. In 2023, the Company began integrating regulatory requirements in a targeted manner. This included the development of an internal ESG score for the supplier selection process, a comprehensive revision of the Supplier Code of Conduct, and the integration of a digital sustainability supply chain risk platform. The Supplier Code of Conduct was published in the first quarter of 2024 on BioNTech's website. Following the publication of the revised Supplier Code of Conduct, BioNTech will adapt the relevant processes. To strengthen sustainability in purchasing processes, the Purchasing Department will add a further sustainability expert as of March 1, 2024.

8.5 In 2023, the Company investigated reports of human rights concerns stemming from observations and concerns raised by departments or individual employees. None of the investigated concerns were substantiated as actual human rights violations. Consequently, they did not have an influence on the re-assessment of the related risk topics. BioNTech has updated its Human Rights Statement based on the results of the human rights risk analyses in 2023.

**9. Approval of this statement**

9.1 This statement was approved by the Management Board of BioNTech SE on January 20, 2025.

9.2 This statement was signed by Dr Sierk Poetting, Chief Operating Officer and Management Board Member of BioNTech SE on 29-Jan-2025 and by Jens Holstein, Chief Financial Officer and Management Board Member of BioNTech SE on 29-Jan-2025:

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Dr Sierk Poetting

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