

## Supplier Code of Conduct

As part of our commitment to the principles set out in the BioNTech Code of Conduct, we expect our business partners to adhere to comparable standards in their conduct. Our expectations are listed in this Supplier Code of Conduct. The standards of conduct are based primarily on the Pharmaceutical Industry Principles for Responsible Supply Chain Management of the Pharmaceutical Supply Chain Initiative (PSCI).<sup>1</sup>

**This Supplier Code of Conduct is made available to our suppliers with the goal of strengthening our mutual understanding of the behaviors that we expect in day-to-day business.**

### Compliance with the law and generally accepted standards

As a supplier to BioNTech you are expected to:

- Comply with applicable laws and regulations, including appropriate anti-corruption regulations.
- 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.

### Management systems

As a supplier to BioNTech you are expected to:

- Have a management system in place to meet the expectations of this Supplier Code of Conduct.
- Provide appropriate resources for the implementation of the concepts described in this Supplier Code of Conduct.
- Have established appropriate risk management systems in order to identify and manage the risks described in this Supplier Code of Conduct.
- Maintain appropriate documentation both to comply with applicable laws and regulations and to document the measures outlined in this Supplier Code of Conduct.
- Have a training programme that ensures an appropriate level of knowledge, skills and qualifications of managers and employees to meet the expectations set out in this Supplier Code of Conduct.
- Want to continuously improve. To this end, you set yourselves objectives, implement appropriate action plans and take necessary corrective action for deficiencies identified through internal or external assessments, inspections and management reviews.

<sup>1</sup> <https://pscinitiative.org>

**Anti-bribery and anti-corruption**

As a supplier to BioNTech you are expected to:

- Avoid participating in any form of bribery, corruption or fraud and will ensure that business decisions are not influenced by inappropriate or illegal consideration, whether in the form of cash, gifts, travel or other items of value.
- Avoid giving invitations, gifts or other items of value with the intention of influencing BioNTech employees.
- Inform BioNTech of any demands or pressures of any kind to offer bribes (any kind of advantage) directly or indirectly to public officials or other parties with the intent to exercise influence or obtain an unfair advantage.

**Accounting books and record-keeping**

As a supplier to BioNTech you are expected to:

- Maintain complete accounting books and records that accurately document all business transactions and expenses and are maintained in accordance with applicable laws and regulations.
- Avoid situations where your own interests conflict or may conflict with the business interests of BioNTech.
- Inform BioNTech immediately if you become aware of a conflict of interest. This also applies if an employee of BioNTech has a financial interest in your company or is in any other way related to your company.

**Protection of assets and information**

As a supplier to BioNTech you are expected to:

- Help protect BioNTech's assets from theft, misappropriation or unnecessary waste.
- Take necessary measures to protect confidential BioNTech data and information available to us.

### **Competition law, economic and trade sanctions as well as fair competition**

As a supplier to BioNTech you are expected to:

- Not pursue activities that are known to be anti-competitive, abusive or unfair and act in accordance with applicable anti-trust and competition laws and regulations.
- Apply fair business practices, including correct and truthful advertising
- Comply with laws and regulations governing the export and import of goods, products and services, including those related to economic and trade sanctions.

### **Insider Trading**

As a supplier to BioNTech you are expected to:

- Avoid insider trading by not buying or selling securities of BioNTech as long as you have information about BioNTech that is not available to the investor audience and that could influence an investor's decision to buy or sell securities.

### **Labor Rights**

As a supplier to BioNTech you are expected to:

- Provide jobs that meet international labor standards, in particular the ILO core labor standards
- 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 labor, and forced or compulsory labor).
- Not accept child labor. The employment of young workers under the age of 18 will only take place in non-hazardous jobs and if young workers are over the legal employment age of a country or the age specified for completion of compulsory schooling.
- Not discriminate against workers on the basis of race, colour, age, sex, sexual orientation, ethnicity, disability, religion, political affiliation, trade union membership or marital status and will take active action against all forms of discrimination.
- Encourage open communication and direct dialogue with employees to solve workplace and remuneration problems.
- Ensure collective bargaining and provide employees with written employment contracts in accordance with local legislation.

- Respect the right of employees to organise themselves freely, to form works councils and to join or not join trade unions.
- Enable employees to communicate openly with management about working conditions without the threat of retaliation, intimidation or harassment.
- Ensure that the wages, working hours, holidays and absences of employees and subcontractors are in accordance with applicable law and/or contracts and ensure compensation of your workers with a living wage according to local living conditions.

### **Data Protection**

As a supplier to BioNTech you are expected to:

- Comply with all data protection laws applicable to your organizational units and their following standards.
- Protect confidential information and use data and information only in accordance with applicable laws and regulations.
- Ensure the rights of the company, employees and patients to the protection of their data.

### **Health and Safety**

As a supplier of BioNTech you are expected to:

- Support a safe and healthy working environment for all employees and visitors through an OHS management system.
- Protect workers from overexposure to chemical, biological, physical hazards and physically demanding tasks in the workplace and in the homes provided for them.
- Have established programs to prevent or mitigate the unintended release of chemicals in the event of a critical situation.
- Identify and assess emergency situations at the workplace and in the premises provided by companies and minimise their impact by implementing emergency plans and response procedures.
- Provide individual safety information on hazardous substances – including pharmaceutical formulations and pharmaceutical intermediates – to train, educate and protect workers from hazards.

### Identification of Concerns

As a supplier to BioNTech you are expected to:

- Encourage all employees to report concerns or illegal activities in the workplace without risk of retaliation, intimidation or harassment.
- Conduct investigations as necessary and take corrective action.

### Animal Welfare

As a supplier to BioNTech you are expected to:

- Treat animals ethically and respectfully, thereby minimizing pain and stress.
- Comply with applicable animal welfare laws and the European Commission's "Ethics for Researchers" guideline<sup>2</sup> or comparable ethical guidelines for research and development.
- Adhere to the principles of the 3Rs (Replacement, Reduction and Refinement).
- Examine all planned animal experiments with regard to their necessity and minimize the use of laboratory animals by searching for alternative possibilities. You are expected to use alternatives to animal testing wherever they are scientifically valid and acceptable to the regulatory authorities.

### Environment

As a supplier to BioNTech you are expected to:

- Have environmental management systems in place.
- Act in an environmentally friendly and efficient manner and minimize negative impacts on the environment.
- Preserve natural resources and avoid the use of hazardous substances wherever possible.
- Explore the possibility of participating in reuse and recycling activities.
- Comply with all applicable environmental regulations. All necessary environmental permits, licenses, information registrations and restrictions are obtained and operating and reporting obligations are met.

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<sup>2</sup> [http://ec.europa.eu/research/participants/data/ref/fp7/89888/ethics-for-researchers\\_en.pdf](http://ec.europa.eu/research/participants/data/ref/fp7/89888/ethics-for-researchers_en.pdf)

- Have systems in place to ensure safe recycling or handling, movement, storage, reuse or disposal of waste, air emissions and wastewater discharges. You are expected to ensure waste, effluents or emissions that may affect human health and the environment are adequately managed, controlled and treated prior to a release into the environment.
- Have implemented systems to prevent and mitigate accidental spills and leaks into the environment.

### **Local Community**

As a supplier to BioNTech you are expected to:

- Respect the local community and strive to avoid or minimize negative impacts on it.

### **Trade Compliance and Conflict Minerals**

As a supplier to BioNTech you are expected to:

- Ensure that goods and materials supplied to BioNTech are not obtained illegally or unethically.
- Confirm the implementation of reasonable due diligence measures for the responsible sourcing of minerals to ensure compliance with appropriate regulations.
- Inform BioNTech in case of production, purchase or trade of regulated conflict minerals (tantalum, tin, tungsten, gold or other minerals or their derivatives that are considered to finance conflicts) from the Democratic Republic of Congo (DRC) and its neighbors.
- Provide, upon BioNTech's request, your due diligence measures and associated results to exclude the possibility of BioNTech being supplied with such minerals.

### **Standards to Your Own Suppliers**

As a supplier to BioNTech you are expected to:

- Require your own suppliers to comply with the principles set out in this Supplier Code of Conduct.
- Systematically integrate and trace this commitment into your business relationships with your own suppliers.