

BIONTECH

**Code of  
Ethics &  
Business  
Integrity**



EN



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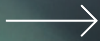
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# INTRODUCTION

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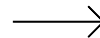
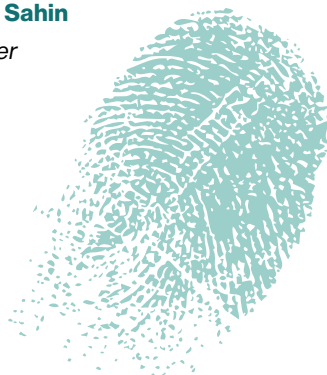
## Message from the Management Board

At BioNTech, we aspire to harness the power of the immune system to develop novel therapies against cancer, infectious diseases and other severe diseases. We believe in scientific rigor, innovation and passion as driving forces. We are committed to improving the health of people worldwide with our fundamental research and our work in the area of development of immunotherapies.

Our vision guides our thinking and actions. Our vision calls on all of us to act in a lawful and ethical manner – when dealing with colleagues, collaborators, business partners, the health-care community and, just as importantly, towards our society and environment.



**Prof. Dr. Ugur Sahin**  
CEO & Founder



## Before We Start

The Code applies to all employees and directors (together: "BioNTech Representatives"). Some activities covered in this Code are the subject of internal BioNTech policies and guidelines which outline the more specific requirements that govern the underlying conduct.

If local laws set higher standards than the Code in a particular situation, local laws shall prevail. In Germany, Switzerland and Austria, the German version of the Code applies.

All BioNTech Representatives are expected to behave in line with the standards set forward in this Code and may face disciplinary and/or corrective actions if they fail to do so.

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»In our efforts to achieve this success, full legal compliance, integrity and a strong sense of ethical responsibility underpin everything we do. Acting with integrity is non-negotiable for BioNTech.«

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The BioNTech **Code of Ethics & Business Integrity** (the "Code") lays out our ethical standards and principles which help us to make the right decisions in our daily business. It provides an overview of applicable laws and regulations, in alignment with BioNTech's internal policies and guidelines.



## Our Values

Our corporate mission is a commitment to improve the health of people worldwide and, harnessing the full potential of the immune system, to develop drugs to fight diseases with high or unmet medical need.

Our core values form the basis of everything we do. They serve as a guide, shaping our corporate identity and underpinning how we should act to achieve our corporate mission.



### We are

#### **Innovative:**

Innovation and innovative thinking in all areas of our work are, therefore, the cornerstone of our success.

#### **Passionate:**

Passion and enthusiasm guide our day-to-day work and everything we do.

#### **United:**

Being united is the foundation for achieving our ambitious goals successfully as a team – both between colleagues and interacting with our partners.





## Ethical Decision-Making

We make decisions at work every day – thereby affecting people, our company and our community. To do the right thing and to achieve our mission, our decisions should be based on our three key principles: Integrity, transparency and responsibility.



### Integrity

means we are committed to doing the right thing.

### Transparency

means we are focused on demonstrating our integrity by making our actions and business decisions visible and verifiable.

### Responsibility

means we are considering the impact of our actions on all internal and external stakeholders.



## What is my Responsibility as a People Manager?

If you are a people manager, you have additional responsibilities to ensure compliance with our Code.

- Lead by example and ensure that your team members understand and can reference this Code and the supporting policies and guidelines.
- Create a working environment where team members feel comfortable asking questions or offering a different perspective.
- Never retaliate against anyone for sharing their concerns.

Consider the following framework for ethical decision-making:

First, try to gather facts and identify the issue and stakeholders who are likely to be affected by the decision. Second, apply the relevant legal, corporate, and ethical framework.

- Is the decision aligned with this Code, BioNTech's supporting policies and guidelines and applicable laws and regulations?
- Is the decision in line with corporate values and principles?
- Would I be comfortable if my decision was to be published in public?

If you are unsure about the right action to take, consult your line manager, the respective organizational function/department or the Compliance & Business Ethics department.



## Speak-Up Culture

At BioNTech, we believe that acting ethically and with integrity is not just the right thing to do but is also in the best interests of all our employees, our company, and our external stakeholders.

BioNTech has established reporting channels at all sites in accordance with applicable whistleblower protection laws. You can refer to these reporting channels if you identify a situation that is associated with potential misconduct. Potential misconduct refers to a known or suspected violation of applicable law and/or our values, policies, guidelines, standards or principles set out in this Code.

As a whistleblower acting in good faith, you are protected from retaliation and negative consequences by the relevant legal regulations on whistleblower protection. You also have the option of remaining anonymous.



## Contact Points for Support

The applicable legal regulations stipulate that various reporting channels must be set up. This has been implemented at BioNTech. Accordingly, you can choose from the following reporting options:

- Your (BioNTech) line manager or above,
- The (BioNTech) organizational function/ department that is responsible for the potentially violated process or regulation,
- The BioNTech Ethics Contact Point (allows for anonymous reporting): <https://biontech.gan-compliance.com/p/Case?>,
- The BioNTech Ethics Contact Point – Phone Hotline: <https://biontech.gan-compliance.com/p/Case/call-hotline>,
- The BioNTech Compliance & Business Ethics department, either in person or at [compliance.business.ethics@biontech.com](mailto:business.ethics@biontech.com) or
- Any member of the (local) management.



## What if?

I suspect that someone is violating the Code, but I am not certain. Should I keep my concern to myself?

- No. If you suspect a violation, speak up. It's better to raise a concern even if, after an investigation, it turns out that your initial suspicions were unsubstantiated.





# 02



## OUR PARTNERS IN THE HEALTHCARE COMMUNITY

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## Interactions with Healthcare Professionals and Healthcare Organizations

Interactions with Healthcare Professionals (HCPs) and Healthcare Organizations (HCOs) are essential for BioNTech's success. They provide important expertise, professional services, and practical insights that allow us to understand unmet medical needs in disease areas and the clinical use of products, help us to plan product lifecycle management or R&D initiatives, and support BioNTech by managing other healthcare-related topics.

Our business relationships and interactions with HCPs and HCOs are professional, based on our ethical standards and aligned with our principles: Integrity, responsibility, and transparency. To do so, we must not influence or appear to influence

HCPs or HCOs, as each of their decisions should be made in the best interests of the patients. The HCPs we work with are selected very carefully by evaluating criteria such as medical expertise, professional experience, and medical specialization. HCPs' compensation must always be carefully determined and should be based on Fair Market Value (FMV). Transfer of value for items such as meals and travel should only be provided if necessary to facilitate a business discussion and not to build rapport or relationships. We always comply with anti-bribery and corruption laws as well as applicable international and national transparency and/or regulatory notification requirements and other applicable laws when dealing with HCPs and HCOs.



## How can I maintain Integrity, Responsibility, and Transparency in my Business Relationships with HCPs or HCOs?

You should always consider these following points when interacting with an HCP or HCO on behalf of BioNTech:

- Always comply with compliance, medical, legal and regulatory standards.
- Every interaction with HCPs or HCOs must be organized responsibly and with a clear and transparent intention.
- Do not offer anything of value to HCPs or HCOs to influence their medical judgement, purchasing practices, or communication towards patients.
- All communications must be accurate and balanced: No aspirational, misleading, or false statements should be made.
- Make sure that all transfers of value made to HCPs and HCOs are appropriate and legitimate and comply with applicable local codes of practices and legal requirements.
- Refer to the respective local codes of practice. If you do not know which standards and codes of practice apply to your interaction, think – am I the right person to be having this conversation? Should I seek some guidance first?





## Interactions with Patients and the Patient Community

To develop novel therapies and bring our broad pipeline of innovative immunotherapies and vaccines to people around the world to improve the standard of care for a wide range of indications, our work focuses on the unmet need of patients and their feedback. When working together with patients, HCPs, HCOs, and patient organizations to develop potential treatments, we are fully committed to the well-being of our patients and their medical care.

We recognize that our patients' doctors are in the best position to recommend approaches and trust that doctors and patients are collectively making the right decisions based on the doctor's medical judgement and in line with the patient's needs. Thus, we never attempt to exert

undue influence on the patient-doctor relationship. We act with the intention of assisting patients and their physicians by listening carefully and doing our best to provide them with relevant objective and factual information that can facilitate an informed decision.

To identify unmet patient needs and to increase transparency and awareness of our clinical trials, we collaborate with patient organizations that independently represent and/or support the needs of patients and/or caregivers. These collaborations are strictly limited to scientific and/or medical activities and do not have any commercial or promotional purpose. Awareness campaigns are based on applicable, balanced, fair, objective, and complete, as well as scientifically and medically substantiated information to ensure accuracy and transparency.

Our interactions with patients participating in research studies and clinical trials are governed by our policies and are conducted in compliance with GxP requirements to ensure the best conditions for the patients.

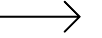




## Product Quality

Meeting or even exceeding regulatory requirements regarding product quality is a key objective of our company. It extends to all our activities through the entire lifecycle of our products from development, through clinical studies, clinical and commercial manufacturing and post-marketing activities.

We believe in continuous improvement in which individuals strive for the highest quality in every step of the process.



## Medical Safety & Pharmacovigilance

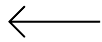
The safety of our products and devices is of critical importance for BioNTech and has the highest priority. We collect, evaluate and report safety information in compliance with applicable laws and regulations worldwide. We monitor the safety of our products continuously to ensure that the benefit-risk assessment is kept up to date and that any changes are implemented without delay at every stage of the product-lifecycle.

All BioNTech Representatives are required to ensure that all legal requirements and regulations are complied with. To report violations, please refer to the reporting channels set up in accordance with the legal provision on whistleblower protection. We also expect our business partners to comply with our standards.

## Product Promotion

We believe in five principles regarding product promotion:

- We do not promote a product before the product is approved for use under applicable laws.
- We comply with all applicable laws, regulations, and BioNTech policies and guidelines when promoting our products.
- We ensure that promotional discussions involve only useful, accurate, and scientifically sound information.
- We ensure that promotional information is presented honestly, in a fair and balanced manner, and consistently with the product's label and prescription laws.
- We never promise or give anything of value with the purpose of encouraging HCPs to prescribe or recommend our products. We never accept anything of value from HCPs.



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## Business Relationships with Third Parties

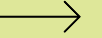
Our business partners – e.g., suppliers, service providers, distributors, and collaboration partners around the globe – are essential to the development, production, and commercialization of our products worldwide. They play a crucial role in our success.

We only engage with reputable and qualified business partners who meet our high expectations in quality, service, price, delivery, reputation, and reliability and who share our commitment to human rights, the environment, sustainability, diversity as well as lawful and ethical business practices.

To uphold these high standards, our employees may only engage with business partners who have been thoroughly evaluated against our standards, carefully selected solely based on

objective, documented criteria, and contracted with a written agreement.

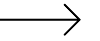
As part of our commitment set out in this Code, we expect our business partners to adhere to our standards set out in BioNTech's *Supplier Code of Conduct* available on BioNTech's website.



## How you ensure successful Business Relationships with Integrity

When selecting new business partners:

- Acknowledge that as a business owner (BioNTech Representative with a specific business need), you are ultimately accountable for managing the risks of a new business relationship. Familiarize yourself with all applicable policies and processes to support compliance.
- Use a predefined set of strictly objective selection criteria to ensure impartial decision-making and an unbiased choice and always select the business partner who best aligns with BioNTech's standards and values. Follow the "4 eyes principle" (oversight by at least two individuals).
- Ensure that our business partners understand and agree in writing to adhere the requirements stated in our *Supplier Code of Conduct*.
- Never disclose or request confidential information before a written contract is signed unless a valid confidential disclosure agreement (CDA) is already in effect. Ensure that all business relationships are governed by written agreements that meet BioNTech's legal and compliance standards and are properly recorded in the relevant systems.
- Continuously monitor all agreements with business partners to ensure that our business partners meet their contractual obligations and our ethical standards, and we meet ours.
- Immediately report any suspected misconduct by a business partner to the Compliance & Business Ethics department or through one of BioNTech's Speak-Up channels, including anonymous reporting options, if preferred.



## Human Rights

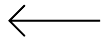
As a responsible company, we are committed to avoid causing or contributing to any adverse impacts on human rights, be it in our own operations or our business relationships with third parties. We encourage BioNTech Representatives to voice any concerns in this context via prior-mentioned Speak-Up channels or directly, by contacting the Human Rights Officer: [humanrightsofficer@biontech.com](mailto:humanrightsofficer@biontech.com).

We seek to identify potential and actual human rights and environment-related risks and incidents at an early stage and to work on preventing and mitigating them accordingly. Identified risks and violations are carefully weighed, reviewed, and prioritized to derive the appropriate engagement level and course of action. Our strategies and commitments are stated in our *Human Rights Statement*.

As part of our commitment to the principles set out in this Code as well as in our *Human Rights Statement*, we expect our business partners to adhere to our or comparable standards in their own operations and business relationships. Our expectations are reflected in the *Supplier Code of Conduct*.

## Local Communities

We respect the local community and strive to avoid or minimize negative impacts on it. We embrace our responsibility as corporate citizens and are committed to supporting our local communities through donations, sponsorships, volunteer activities, and more. We encourage BioNTech Representatives to participate in volunteer activities.



## Fair Competition

We believe that our science enables us to earn business fairly, lawfully and honestly. We believe that we are successful based on our own merits, and we avoid any conduct that could be perceived as unfair competition.

While we expect BioNTech Representatives to compete vigorously, we also require them to compete fairly, follow applicable antitrust and competition laws, and never use deception or misrepresentation to gain an unfair advantage over our competitors.

When we talk to HCPs, government officials, patients or any other external individuals, we must only provide information that is truthful and approved for external communication. We must never make disparaging comments about our competitors.



### What if?

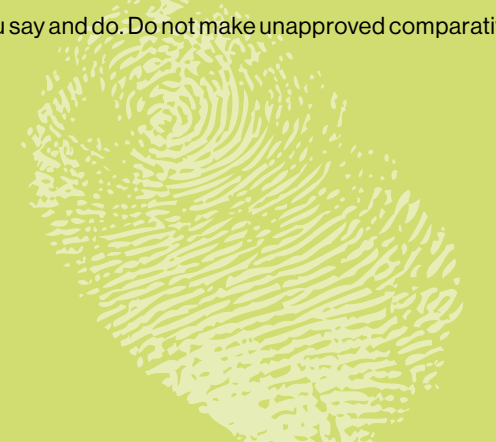
At a local industry association happy hour, I am approached by a sales representative from a BioNTech competitor who suggests that we meet for coffee next week to “coordinate” field activities in our shared sales territory. Can I meet him for coffee?

- Trade association meetings have legitimate purposes. However, interactions between competitors may give the appearance of anti-competitive agreements.
- Although your attendance at the happy hour event would not require legal approval and clearance, any meetings with competitors for business reasons would require any BioNTech Representative to consult with the Legal Department to clarify appropriate topics for discussion and this proposed coffee meeting topic would not be appropriate.



### Compete fairly

- Comply with antitrust and competition laws in the countries where we operate.
- Deal fairly with our customers, vendors, suppliers, business partners and competitors.
- Compete based on the quality of our science and products.
- Do not share our science, intellectual property, prices, business or pricing strategies, allocations of customers or sales territories or plans with competitors.
- Never enter into an arrangement with a competitor to
  - raise or hold prices on our products,
  - divide territories or markets,
  - prevent another company from entering our market,
  - refuse to deal with a customer or supplier,
  - restrict production or sales or
  - force patients or doctors to use our product by tying it to something they need.
- Seek competitive information only from public sources.
- Be fair, factual, and transparent in what you say and do. Do not make unapproved comparative claims.



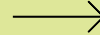


## Anti-Corruption and Anti-Bribery

Engaging or participating in any form of bribery or corruption is strictly prohibited. We do not promise, give, or offer nor accept or request anything of value with the intent to unlawfully or unethically influence a person's decision making

or behavior. BioNTech does not differentiate between government officials, HCPs, business partners, or private individuals; corruption and bribery are not tolerated regardless of the position of the giver or recipient.

We also expect our clients and business partners to prevent corruption and bribery. This is because as a company, we are not only responsible for our own actions, but also for the actions of any third parties who represent us. For us, it's simple: Corruption or bribery – of anyone, at any level, at any organization – is never acceptable.



## We don't give or receive anything inappropriate

- Any courtesy that could compromise professional judgment is always inappropriate.
- Do not offer anything if it is being given to influence a decision or if it would give the appearance of something improper (even if the value is aligned with BioNTech policy).
- Recognize that there are strict rules around providing benefits to HCPs and government officials; always check the applicable BioNTech policies and guidelines before offering anything of value to them. And you can always reach out to the Compliance & Business Ethics department when in doubt.
- When doing business on behalf of BioNTech, never ask anyone for a gift, meal or entertainment, and if anyone asks you for a similar benefit, do not oblige.





## Conflicts of Interest

All BioNTech Representatives, including Management and Supervisory Board Members, may be exposed to situations in which personal interests – in either a financial or non-financial capacity – conflict, or appear to conflict, with BioNTech's interests.

Whenever such a situation arises, we make this conflict of interest transparent and take appropriate measures to ensure that we always act with integrity and in the best interests of BioNTech. Every business decision or activity at BioNTech must be independent of personal or subjective interests.

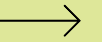


## Interactions with Government Officials

Because we work to bring science forward, we believe it is our responsibility to share relevant data and insights to inform the public debate, including lawful interactions with government bodies, elected officials, and government officials.

We want these dialogues to be based only on relevant, conclusive, and honest information and proven scientific data to address challenges in the healthcare environment and its regulatory framework.

Therefore, any interaction with government officials must comply with all applicable laws and BioNTech's internal policies and guidelines.



### What if?

What do I have to consider before handing out any kind of food or beverages at industry events?

- Please consider whether there is any possibility of government officials attending the industry event. If you cannot rule out their attendance, please follow our internal policies and guidelines.





## Fraud

At BioNTech, we perceive fraud as deliberately deceiving a person or organization to unjustly obtain an unauthorized benefit, which could be money, property, or services. We encourage BioNTech Representatives and our partners to help us detect fraud and prevent it before it happens. Examples of fraud include:

- theft of funds, products, or any other BioNTech assets (including physical, intellectual property, and trade secrets) and
- data fraud, such as the manipulation of records, accounting information, or financial statements (including falsifying expense reports, understating liabilities, or overstating revenue, earnings and assets).

## What should I consider?

- Conduct due diligence before engaging with a new customer or vendor and
- Be alert, and only conduct business with organizations or individuals who are willing to provide us with the appropriate information so that we can determine if the transaction is legitimate.



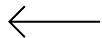
## Anti-Money Laundering

Money laundering is the smuggling of illegally generated funds or property into the legitimate economy through use of deceptive transactions and business practices.

BioNTech is committed to conducting business in accordance with the highest ethical and legal standards and does not tolerate conduct that violates or appears to violate anti-money laundering laws. We should carefully analyze business partners and transactions and report any concerns or suspicions to the relevant legal authorities.

If a unique situation arises where a transaction involves the above practices, you must receive approval from the Compliance & Business Ethics department in order to proceed with the transaction.





## Data Privacy

Data Privacy is of high importance for us and affects essential areas of our company. We respect the privacy of our patients, BioNTech Representatives, customers and any other individuals with whom we do business. We comply with all applicable data privacy laws.

Patients, employees, customers, or other third parties entrust us with their (sensitive) personal data. We collect, retain, process, or transmit such data with great care and strict confidentiality. Having access in particular to the sensitive personal data of patients is essential for our operations and the advancement of science, as is the personal data of all our BioNTech Representatives. Therefore, we take responsibility for collecting, using and processing any personal information only for legitimate purposes and in accordance with a legal basis while protecting the data from possible misuse, inappropriate disclosure and loss.



### Who can I contact?

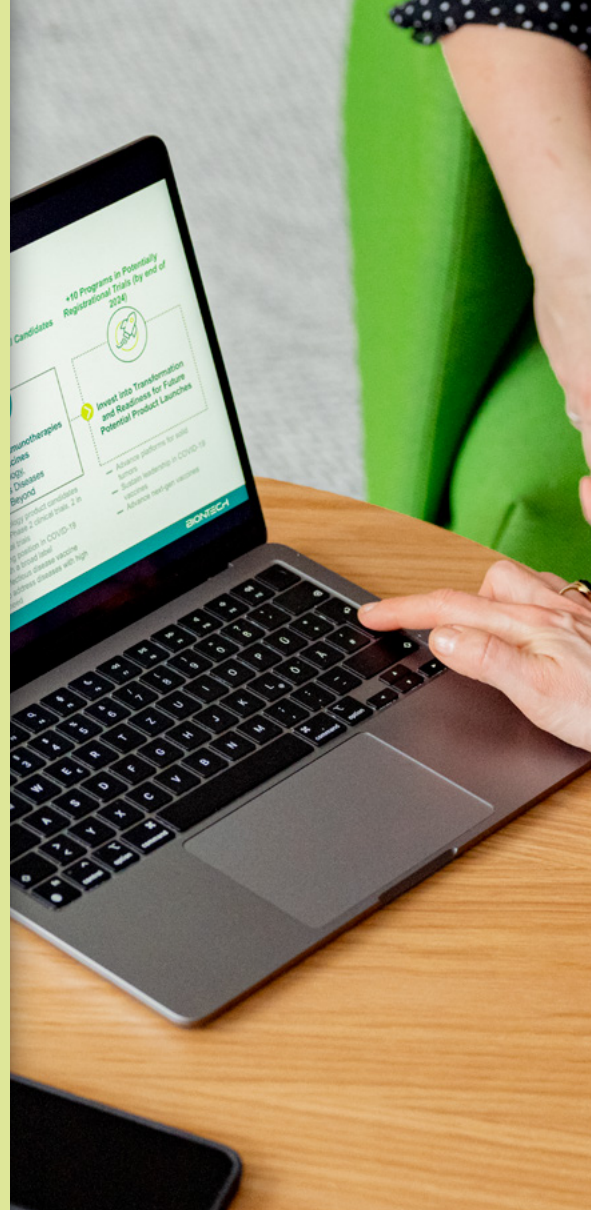
In case of concerns, contact our Data Protection Officer:

[data.privacy@biontech.de](mailto:data.privacy@biontech.de)

### What if?

Someone accidentally emailed me a clinical report that includes names of patients and their DNA data. I suspect a breach of data protection law – what should I do?

- Contact our Data Protection Officer immediately to ensure that appropriate protective measures are taken and that BioNTech's data protection (reporting) obligations are properly fulfilled.



## Cyber and Information Security

The significant and growing volume of sensitive information that BioNTech receives, generates and stores – such as trial, patient, employee, financial and research data – requires robust cyber and information security capabilities across the organization. BioNTech's security approach seeks to adequately protect all information, systems, assets, physical locations, and people.

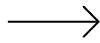
We all have a responsibility to ensure that our systems are used properly and that the data they contain is properly maintained. If you suspect that there may be a threat to our information systems, please contact the Cyber and Information Security department immediately via the ServicePortal to help protect us: [it-helpdesk@biontech.de](mailto:it-helpdesk@biontech.de). A quick response is key to ensuring the confidentiality, integrity and availability of our information at all times.



## The Environment

Our aim is to achieve our mission and to create value within planetary boundaries. We are responsible for future generations and are following our path in line with the Paris climate protection agreement and in an environmentally conscious way.

Our Management Board has adopted binding climate protection targets for CO<sub>2</sub>e emissions in our own area of responsibility and for our supply chain. These targets have been independently validated by the Science Based Targets initiative (SBTi). Our environmental and energy management and our decarbonization strategy are linked to these targets. BioNTech's group-wide environmental management system is largely certified and is based on relevant international standards. We contribute to climate protection, use natural resources responsibly and expect the same from BioNTech Representatives and business partners.





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## Diversity, Equity, Inclusion and Belonging

Diversity, Equity, Inclusion and Belonging play important roles in BioNTech's success, as different cultures and perspectives contribute to its achievements. Moreover, BioNTech is a signatory of the "Charta der Vielfalt," an initiative that promotes diversity in the working world in Germany.

At BioNTech, we do not tolerate discrimination, favoritism, or harassment based on gender, religion or belief, nationality, ethnic or social origin, political opinion, age, sexual orientation, marital status, disability, physical appearance, health status or any other aspect of personal status. Discrimination is unjust or unfair actions that are made either directly or indirectly against individuals or groups that may cause a hostile, intimidating, or offensive working environment.

We strive to ensure a respectful environment with equal opportunities in all areas, including recruitment and selection to professional development and succession planning as well as compensation. Be aware that anyone who discriminates against or harasses another person may face disciplinary actions, up to and including termination of employment with BioNTech.

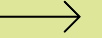
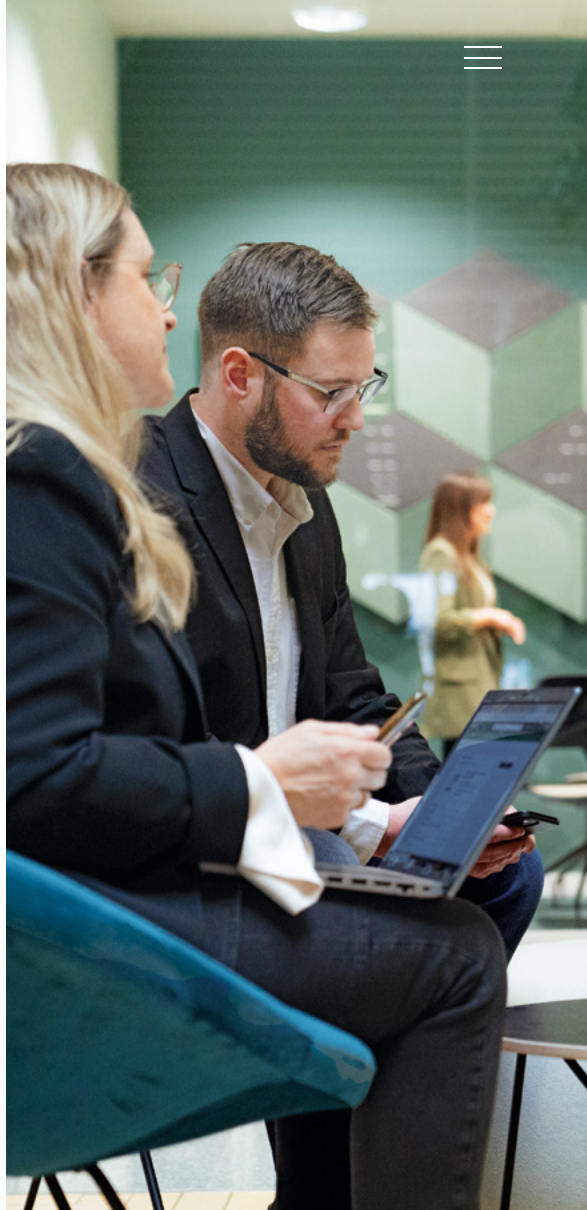




## Respect in the Workplace

No matter which job you do, you belong to BioNTech. We respect all ideas, experiences, and backgrounds. Belonging and mutual respect is our strength, and we value each individual and their contributions. We maintain an environment in which every BioNTech Representative can expect fair and respectful treatment.

We offer different formats to foster open dialogue within our company and provide regular (strategic) updates and guidance.



We strive to treat others how we would like to be treated ourselves. In order to ensure mutual respect, we are guided by the following aspects:

- We treat each other with kindness, politeness and empathy. An important part of this is the language we use, written or spoken.
- We take responsibility for our own communication, written and spoken, including language, tone, expressions, and body language, even when disputing and resolving disagreements.
- We encourage all colleagues to share their thoughts irrespective of rank in the organization without a fear of any risks and in the confidence that they will be taken seriously.
- We support our colleagues in their mission tasks in sharing all relevant information they need, valuing transparency in our decision-making. We ensure that we include all colleagues in all relevant events and meetings.
- If we share feedback, we do it in a supportive and constructive manner. We encourage our colleagues to engage in honest and open conversations if we feel they might be stuck in miscommunication.
- Resolving conflicts, we focus on the issue at hand, and respecting different perspectives. We acknowledge each other's emotions because we value our colleagues as human beings. We actively reach out to correct misunderstandings and apologize when needed.
- We value people's achievements and show appreciation in our daily work.

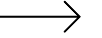


## Health and Safety in the Workplace

The safety, health, and well-being of our staff, research, and products are critical to the success of our business operations. To ensure that we meet our highest standards, we diligently follow our safety procedures and foster a culture of health and safety throughout our organization.

We conduct regular risk assessments to identify potential hazards and implement appropriate measures to mitigate them. These measures include first aid and rescue procedures, occupational health consultations, and other services as needed.

In addition to our focus on physical health, we place particular emphasis on the mental health of all BioNTech Representatives as part of our comprehensive corporate health management program. By prioritizing the well-being of our team, we are better positioned to achieve our goals and continue to drive innovation in our industry.



## Protection of People

BioNTech Representatives are urged to actively participate in ensuring the security of BioNTech's people, patients, assets, products, supply chains and property. A holistic approach to averting deliberate danger and damage is vital. Your collaboration is essential in creating a secure workplace environment and safeguarding our patients.

## Treatment of Animals

We are committed to the ethical and respectful treatment of animals in our activities. The responsible use of animals during all steps of the development of medicines, vaccines and healthcare products is essential. At our sites we comply with applicable animal welfare laws and the European Commission's "Ethics for Researchers" guidance for research and development to avoid animal pain and distress. We believe that good animal care and good science go hand in hand.

In our modern facilities, all animals receive high standards of housing, husbandry, handling and care, state-of the art practices are employed.

We fully adhere in animal studies to the 3R principles: Replacement, Reduction and Refinement. In this context, all planned animal studies are evaluated to verify necessity and minimize the use of laboratory animals by searching or implementing alternative research methods whenever possible, scientifically valid, and acceptable to regulators. We also expect our business partners to adhere to these statements when commissioned work involves animals.





# OUR DUTY TO THE INVESTOR COMMUNITY

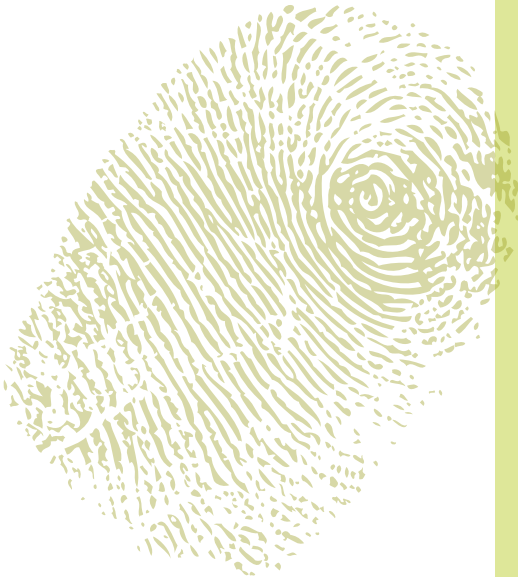
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## Patents, Trademarks and Copyrights

Our intellectual property (IP) is vital to protecting advancements and driving innovation. Our IP includes patents, trademarks, and copyrights. At BioNTech, we have generated a strong and diverse patent portfolio that covers our core technologies and key products.



### What if?

I am a manager recruiting new employees. I interviewed a candidate who is a senior researcher for one of our competitors. She has extensive experience and knows a lot about our competitor's product pipeline. Is it okay if I hire her?

- Yes, we can typically hire from competitors. However, we cannot hire anyone with the expectation that they will share proprietary or confidential information.
- Additionally, we need to take steps to ensure that we do not improperly elicit, receive, or use this information. Unauthorized use of a competitor's data may damage our own IP position.





## Confidential and Proprietary Information

In addition to our patents, trademarks and copyrights, BioNTech also has confidential and proprietary information, such as trade secrets, scientific or technical information, IP plans and strategy, sales, marketing, and other corporate databases, research and data regarding new product development and related concepts, business plans (both current and under development), client lists, promotion and marketing programs, or any other confidential or proprietary information relating to development programs, costs, revenues, marketing, investments, sales activities, promotions, non-public financial information, manufacturing processes, techniques and financing methods.

We protect confidential information from unauthorized disclosure and use.

In addition to BioNTech's own confidential and proprietary information, we must also maintain the confidential and proprietary information of third parties, including our customers, suppliers, and business partners.



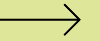
## What if?

I am on the train and a colleague calls me. What do I need to consider?

- You should ensure that no confidential information can be overheard by third parties. If this is not possible in the specific situation, inform the caller if necessary that the call must be postponed. Under no circumstances should confidential information be mentioned on the phone if there is a risk that third parties could overhear.

I am speaking to a friend who works at another biotechnology company, and he/she asks me about my role and what I am working on. How should I respond?

- Be careful what information you share. You may only disclose publicly available information. Even though he/she is your friend, BioNTech's confidential information is not protected if you disclose it to him/her. Such disclosure may result in legal action.
- It is the responsibility of all of us to safeguard BioNTech's confidential and proprietary information and IP to ensure that unauthorized disclosure of confidential and proprietary information and IP doesn't damage its value and give an unfair advantage to third parties outside of BioNTech.





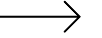
## Disclosure Commitment and Insider Trading

As a company publicly listed on a U.S.-based stock exchange, BioNTech is responsible for providing information on a level playing field to all investors. At BioNTech, we value transparency and fully comply with all applicable disclosure requirements. BioNTech Representatives are responsible for ensuring that required disclosures are complete, accurate, and not misleading.

BioNTech Representatives may have access to information that is not available to the general public. The law prohibits the use of such insider information when trading in securities or other tradable financial instruments, as well as the disclosure of insider information to third parties for such purposes.

Insider trading is prohibited regardless of whether a company is publicly or privately held, and all BioNTech Representatives, including all managers, officers, and board members, must comply with all relevant laws prohibiting

insider trading. The scope of the regulations on insider trading may vary from country to country. BioNTech Representatives are prohibited from trading or tipping on the basis of material, nonpublic information. Certain employee transactions must be reported to the Legal department and pre-cleared. BioNTech Representatives faced with questions regarding insider trading restrictions should contact the Legal department.



## Publications

We ensure that our publications are accurate, and that information is communicated in a timely and proper manner to the appropriate audience. However, remember to protect any confidential, personal and/or patentable information from publication.

Using the publication review process for any external or public material will assist in securing intellectual property rights, protecting confidential information and personal data before publication occurs. As an author you are responsible for ensuring that the content of any material adheres to the above principles.





## Social Media

As a global company, we are committed to effectively building and managing our reputation. Engagement in online communication and media outlets is an essential and powerful tool for communicating with the global community, as well as for managing our reputation.

However, as a publicly traded company in a highly regulated industry, we have various legal and regulatory obligations with respect to how, with whom, and when we communicate. Violation of these obligations can create significant financial, legal and reputational damage.



### What if?

I was contacted by the media regarding a rumored acquisition. I have heard discussions in the office about the deal and passing along what I have heard might close the deal. Is it a good idea to tell the reporter what I know?

- No. Unless you are an official BioNTech spokesperson, do not answer reporters' questions or comment on rumors. The information you heard may be incomplete or incorrect or could even constitute insider information, and it is not your role to share it.

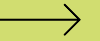
I read a blog post that is critical of our company and contains inaccurate information about our innovative science. I know the facts about that product well and want to set the record straight – is it okay for me to reply online?

- No. Unless you are an official BioNTech spokesperson, do not comment online about our company. Notify the Legal or Corporate Communications department so that the appropriate individual can address the situation.

### What should I consider?

Refer any media inquiries to the Corporate Communications department.

- Be transparent about your affiliation with BioNTech on your private social media profiles if you are planning to comment on (or otherwise actively engage with) any content related to BioNTech.
- Separate your personal view from BioNTech's view: Clearly state that any opinions you have about BioNTech are your own and do not reflect the company's opinion.
- Do not disclose any confidential or sensitive information about BioNTech or our business partners (HCPs, patients, organizations, vendors, or strategic partners).
- Always act in a respectful manner when engaging on social media.
- You can comment on, share or like content that has been posted by BioNTech.
- You must not disclose confidential information and/or sensitive information under any circumstances.
- You must not make any comments on the safety or efficacy of any product candidate or approved product.





## Accurate Books, Records and Financial Controls

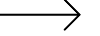
Our long-term success is highly dependent on how well we manage our business. Our books and records are the basis of our financial position on which we make important strategic decisions. That is why we need clear, complete, accurate and timely records of our business transactions which must be authorized and recorded in compliance with IFRS and statutory requirements.

Each BioNTech Representative is responsible for following all internal controls in recording and documenting our books and records. We also ask everyone to be alert for any suspicious financial transactions; to do this it is essential to know your customers and business partners and understand their operations to prevent illegal activity (e.g., money laundering).

We have developed adequate controls within our internal control system regarding financial reporting and cooperate with our internal audit function to ensure the accuracy and integrity of our financial reporting.

## Tax & Customs

In all countries in which BioNTech is active, we seek to ensure that BioNTech meets its tax obligations in full and on time. BioNTech undertakes effective and risk-oriented monitoring of tax-relevant business processes. The implementation of suitable measures ensures compliance with tax obligations. In all tax matters, BioNTech cooperates with the relevant tax authorities in a trustworthy and transparent manner.



## Trade Compliance

Governments around the world impose trade restrictions to support their economic, strategic, or national security interests. To safely and lawfully provide our products to the patients who need them around the world, we must comply with any trade controls that apply in the areas where we travel or operate.

We are responsible for complying with import, export control and economic sanctions laws that govern the transfer of certain products, software, and technologies, as well as the performance of some services and interactions with third parties.





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