



# HUMAN RIGHTS STATEMENT

## 2024

## 1. Introduction

BioNTech is committed to improving people's health worldwide with its fundamental research and its work in the development of immunotherapies utilizing the full potential of the immune system to fight cancer, infectious, and other serious diseases. BioNTech supports the United Nations Sustainable Development Goals (SDGs). Its research and product development efforts make a relevant contribution to supporting the third United Nations Sustainable Development Goal (SDG 3): Ensure healthy lives and promote well-being for all at all ages. This aligns with the Company's commitment to global social responsibility. Core to BioNTech's business practices is ensuring that people globally can potentially benefit from its efforts. To accomplish this, the Company intends to maintain a focus on addressing high medical needs and prioritizing equitable access to innovative medicines in healthcare globally. As an environmentally and socially conscious company, BioNTech respects the UN Guiding Principles on Business and Human Rights. As a responsible corporate citizen, the Company holds itself accountable to prevent, identify and mitigate any adverse impacts on human rights within its operations and value chain.

## 2. Applicability

This Statement applies to BioNTech SE and its affiliates (BioNTech SE together with its affiliates being "BioNTech"), including but not limited to all Management Board members, all other officers, and employees, collectively referred to as "BioNTech Representatives."

The current version of this Statement is effective as of January 1<sup>st</sup>, 2024. BioNTech's Human Rights Officer will review this Statement annually and adapt it as necessary. Every version of this Statement is approved by the full Management Board of BioNTech SE.

The content stated in this Statement is relevant for all those BioNTech Representatives (or their delegates) and business partners. BioNTech expects business partners to acknowledge and commit to all relevant human rights and environmental covenants and all BioNTech's standards set in this statement as well as the Supplier Code of Conduct.

## 3. Commitment

To ensure a solid and comprehensive approach to human rights, BioNTech developed its strategies and commitments based among others on the following leading standards: the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, UN International Covenant on Economic, Social and Cultural Rights, UN International Covenant on Civil and Political Rights and the International Labour Organization's (ILO) 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, labor, environment, and anti-corruption.

#### 4. Human rights due diligence process

BioNTech takes its human rights and environmental due diligence responsibilities seriously. The Company seeks to conduct its business in its daily operations with care and respect for people and the environment. The company's daily operations are governed by the Code of Business Conduct & Ethics, Supplier Code of Conduct, and other policies and guidelines.

These BioNTech-specific ethical business conduct obligations apply to BioNTech's operations and business partner relationships. They are implemented through standard operating procedures, training, upskilling, and reviews to facilitate understanding and compliance.

##### ***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.

##### ***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.

##### ***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.

***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.

***Reporting***

BioNTech will publish an annual report on its human rights due diligence obligations. This report will provide, among other information, the identification of human rights and environmentally related risks and potential violations of due diligence obligations, according to international or national laws and standards. The report will present information on preventive and mitigation measures that BioNTech takes to prevent identified potential risks or to remedy violations. BioNTech will continuously refine and adapt the assessment and derived measures while evaluating and reporting on their impact and effectiveness. Documents on the fulfillment of BioNTech's due diligence obligations will be stored. The report will be publicly accessible on the Company's website for a period of at least seven years.

**Relevant human rights topics**

The following human rights topics are the result of the annual human rights and environmental-related risk analysis conducted in 2023 and have been prioritized considering nationally and internationally accepted criteria in alignment with the German Act on Corporate Due Diligence Obligations for the Prevention of Human Rights Violations in Supply Chains (Lieferkettensorgfaltspflichtengesetz, LkSG). BioNTech strives to continuously improve this process. If necessary, this includes adjustments or extensions to the following list.

***Right to health***

The "Right to Health" derives from Article 25 of the Universal Declaration of Human Rights and is recognized in the International Covenant on Social, Economic and Cultural Rights, Article 12. BioNTech is committed to improving people's health worldwide with its fundamental research and its work in the development, evaluation, review and use of vaccines and immunotherapies utilizing the full potential of the immune system to fight cancer, infectious diseases, and other serious diseases.

***Access to innovative medicines***

As part of this effort, BioNTech continues to focus on high unmet medical needs – especially the development of cancer therapies and vaccines against some of the world's

most prevalent infectious diseases – and equitable access to innovative medicines. With its research programs, the Company can potentially have a major impact on global health, particularly in lower and middle-income countries (LMICs) which carry disproportionate amount of the global burden of disease. [According to the World Bank](#), LMICs, which account for nearly 80% of the world’s population, face the highest morbidity and mortality rates due to infectious diseases and a rising proportion of global cancer-related mortality.

### ***Clinical trials***

BioNTech ensures that all clinical research activities meet or exceed international ethical standards in respecting and protecting the rights, well-being, safety, and dignity of all participants in our clinical trials. Clinical trials are carefully designed, extensively monitored, and require prior approval by national authorities and independent ethics committees (IECs) or institutional review boards (IRBs).

Each clinical trial is conducted according to the approved clinical trial protocol, a document that describes how a clinical trial will be conducted and ensures the safety of the trial subjects and integrity of the data collected. The protocols of BioNTech’s clinical trials are in compliance with ethical principles that have their origin in the Declaration of Helsinki (2000), Council for International Organizations of Medical Sciences (CIOMS) International Ethical Guidelines, International Council of Harmonisation (ICH) for Good Clinical Practice (GCP) guidelines, and applicable laws and regulations.

Trial participants will be informed promptly if new information becomes available that may impact their well-being and/or their willingness to participate in the trial. Trial participants are only included in the trial based on their free informed consent.

BioNTech honors participant privacy by safeguarding personal data per the applicable data protection requirements. All data collected during clinical trials is kept confidential. Personal data regarding a trial participant’s identity will not be transferred to BioNTech and will not be included in any reports or publications.

Irrespective of the outcome, BioNTech submits the outcomes for all primary and secondary outcome measures in clinical trials for publication in publicly accessible and reputable academic journals (in accordance with the International Committee of Medical Journal Editors (ICMJE) standards). Further, BioNTech commits to disclose information about clinical data and clinical trials i.e.: “BioNTech Transparency Declaration,” in line with all applicable laws and regulations, including data privacy laws.

***Health and safety at work***

BioNTech's success and overall operations depend on the health and well-being of its staff, its research, and its products. The Company promotes a culture of occupational safety and follows adequate safety procedures especially put in place for this. To avoid accidents and work-related illnesses, employees are provided with the necessary safety instructions, personal protective equipment, and training, to safely and responsibly fulfill their roles and tasks. A dedicated Safety, Health, and Environment (SHE) team sets standards of occupational health, safety, and environmental protection across all its sites meet or exceed the standards required by law. It also supports functions and sites and checks compliance with defined standards.

With the aim of achieving a stable and high-quality standard of holistic employee wellbeing, the SHE team collaborates with relevant entities in the company to create health-promoting working conditions, identify and address risks to psychosocial health at the earliest possible stage, and promote knowledge and awareness about mental health and wellbeing through training and information campaigns.

***Non-discrimination, inclusion, and diversity***

Discrimination, favoritism, or harassment based on gender, political opinion, religion or belief, nationality, ethnic or social origin, age, sexual orientation, marital status, disability, physical appearance, health status or any other aspect of personal status is not tolerated.

Diversity is an important factor in BioNTech's success, as different cultures and perspectives contribute to its achievements. Moreover, the Company is a signatory of the *Charta der Vielfalt* since 2018, an initiative that promotes the inclusion of diversity in the working world in Germany.

***Working time and rest breaks***

The employees' right to rest is respected and work-life balance is emphasized, with a focus on managing working hours per day and week. Efforts are made to accommodate the needs of employees for a balanced professional and personal life.

***Child labor***

BioNTech prohibits any form of child labor (including child labor defined in ILO Convention No. 138 on Minimum Age and the ILO Convention No. 182 on the Worst Forms of Child Labour) in its operations and supply chain. The Company abides by the local minimum age for employment based on local compulsory schooling and does not employ individuals younger than 15. Young workers under the age of 18 will only be allowed to perform non-hazardous jobs. When recruiting, the Company collects and verifies relevant personal employee identification information (e.g., age, nationality) and documents the information securely in the paper based and digitalized personnel files.

***Freedom of association***

BioNTech respects the rights of every individual and is committed to complying with the labor laws in the markets where it operates. Employees are free to join or not join any union of their choice to represent them and engage in collective bargaining. Moreover, the Company complies, at a minimum, with the provisions of the ILO Core Convention Nos. 87 and 98 on Freedom of Association and the Right to Organize and Collective Bargaining, without prejudice to more favorable national regulation.

***Forced labor***

BioNTech aims to prevent or mitigate any adverse impact on human rights that are directly linked to its operations, products, or services, or that may arise from its business relationships. Forced labor practices are not tolerated and BioNTech does not partner or conduct business with any individual or company that is known to participate in forced, bonded labor, or involuntary prison labor.

***Environment and Climate Protection***

BioNTech is committed to environmental and climate protection. BioNTech supports the Paris Agreement's target of limiting global temperature increase to 1.5 °C. To contribute to these efforts, the Company has set targets for reductions in its greenhouse gas emissions by 2030. It is committed to holding its most important business partners – in terms of greenhouse gas emissions – to the same science-based standards. Suppliers are expected to have an environmental management system in place and to minimize adverse impacts on the environment. Based on the results of the abstract risk analysis in the supply chain, the environmental topics "substances of concern" and "waste" will be further assessed.

**5. Roles and Responsibilities**

Human Rights at BioNTech are guided by the values and expectations in the Code of Business Conduct & Ethics, as well as the Supplier Code of Conduct for matters on the activities of the Company's business partners.

BioNTech holds itself and its business partners accountable to these standards by reflecting the principles of this Statement in the agreements concluded with business partners. More stringent requirements than outlined in this Statement may apply according to local laws and regulations.

Situational changes in the internal and external landscape are actively assessed and reported for political, social, or environmental changes which may adversely impact the human rights of the Company's employees and surrounding communities.

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.

This structure and the [Grievance Process](#) are accessible to all internal and external stakeholders to review the guiding principles and voice any potential concerns including human rights, environment, anti-corruption, etc. To voice any form of concerns, please refer to the *Speak-Up Policy*.

**Questions or concerns? Please contact us:**

Corporate Social Responsibility

**Contact Details:**

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