



# HUMAN RIGHTS STATEMENT

## 2026

## 1. Introduction

BioNTech is committed to improving people's health worldwide with its fundamental research and its work in the development of immunotherapies and mRNA vaccines utilizing the full potential of the immune system to address cancer, infectious, and other serious diseases. BioNTech supports the *United Nations Sustainable Development Goals* (SDGs). Its research and product development efforts aim to make a relevant contribution to supporting the third *United Nations Sustainable Development Goal* (SDG 3): Ensure healthy lives and promote well-being for all people 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, BioNTech intends to maintain a focus on addressing high medical needs and contributing to equitable access to innovative vaccines targeting infectious diseases globally. As an environmentally and socially conscious company, BioNTech aligns its practices with 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" or "the Company"), 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 February 19<sup>th</sup>, 2026. This Statement is annually reviewed and adapted if necessary. Every version of this Statement is approved by the full Management Board of BioNTech SE.

The Statement is relevant for all BioNTech Representatives 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 BioNTech's *Supplier Code of Conduct*.

### 3. Commitment

BioNTech aims to prevent or mitigate any adverse impacts on human rights that may arise or result from its operations or business relationships. To ensure a solid and comprehensive approach to human rights, BioNTech developed 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, labor, 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 wherever feasible.

Where local laws impose lower compliance standards than those outlined in international principles, BioNTech seeks to honor the international standards to the greatest extent possible, provided such adherence does not conflict with mandatory local legal requirements. In cases where local laws prevent full alignment with international standards, BioNTech remains committed to promoting ethical practices and advancing compliance beyond the minimum legal requirements wherever practicable.

Human Rights at BioNTech are guided by the values and expectations stated in the [Code of Ethics & Business Integrity](#), as well as the [Supplier Code of Conduct](#) which is applicable for most of the Company’s cooperation and business partners.

BioNTech holds itself, its Representatives 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.

Changes in the internal and external landscape along political, social, or environmental dimensions which may adversely impact the human rights of the Company’s employees and surrounding communities are actively assessed.

#### 4. Roles and Responsibilities

The ultimate responsibility for compliance with human rights and environmental obligations across BioNTech's own operations and supply chain lies with the Management Board.

The Human Rights Officers (HROs), appointed by the Management Board for the BioNTech Group, oversee the Company's human rights and environmental risk management as well as compliance with human rights due diligence obligations. The HROs, in their function, report directly to the Chief Operating Officer and provide the Management Board with a report at least annually.

Nominated Risk Owners are responsible for human rights and environmental risk management for specific risk areas. To support risk management, they can assign dedicated tasks within their area of responsibility. To strengthen and further develop BioNTech's human rights and environmental risk management, the HROs support Risk Owners and involved teams with expertise, guidance and resources.

#### 5. Human Rights Due Diligence Process

BioNTech's approach to identifying and addressing actual or potential human rights and environmental impacts across its own operations and supply chain is designed to meet the requirements of applicable regulatory and legal frameworks, including full compliance with the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz, "LkSG"). This includes implementing appropriate due diligence measures with the aim of preventing or minimizing any risks to human rights or environment-related risks or of ending the violation of human rights-related or environment-related obligations.

The Company seeks to conduct its business in its daily operations 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.

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.

##### 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 as well as to work on preventing, mitigating and remediating them accordingly.

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 on abstract level, using information from external and internal sources such as recognized external indicators, grievances received and internal Company data. Based on the abstract risk assessment, risk areas are evaluated on a concrete level, incorporating, among other aspects, local expertise and knowledge where possible.

For its supplier risk assessment, BioNTech uses a combination of abstract risk assessment, based on recognized external indicators for country and industry risks at the supplier level, with a concrete supplier risk assessment applying defined prioritization criteria and following a risk-based approach. In the concrete assessment, BioNTech opts for supplier self-assessments via respective questionnaires.

The consideration of potentially affected people is reflected in various processes of risk assessment, e.g., via taking into account BioNTech's Representatives profiles per country and site at abstract levels, via the consideration of potentially vulnerable groups per risk area at country and site-level in the concrete risk analysis, or via external country and industry risk indicators in the supplier risk assessment.

BioNTech assesses, weighs and prioritizes human rights and related environmental risks primarily based on severity (scale – scope – irremediability) and likelihood.

## 5.2. Relevant Human Rights Areas

Based on the annual human rights and environmental risk assessment, BioNTech focuses particularly on the following risk areas<sup>1</sup>:

### ***Health and Safety at Work***

BioNTech's success and overall operations depend on the health, safety and well-being of its staff, its research, its products, and its product candidates. The Company promotes a culture of occupational safety and follows bespoke adequate safety procedures in line with its [Statement on Environment, Energy and Occupational Health & Safety](#). To avoid

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<sup>1</sup> Prioritized risks, in accordance with the German Supply Chain Due Diligence Act.

accidents and work-related illnesses, employees are provided with the necessary safety instructions, personal protective equipment, and training so that they can safely and responsibly fulfill their roles and tasks. BioNTech equally requires its suppliers and business partners to maintain a safe and healthy work environment as stated in BioNTech's *Supplier Code of Conduct*.

### ***Environmental Impact***

BioNTech is committed to environmental and climate protection. The company sets ambitious standards with its own internal Sustainability Guideline for new buildings and in line with the [Statement on Environment, Energy and Occupational Health & Safety](#). The same way, suppliers are expected to have an environmental management system in place to minimize adverse impacts on the environment.

### ***Equal Treatment and Non-Discrimination***

BioNTech does not tolerate any 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. BioNTech equally requires its suppliers and business partners to take action against all forms of discrimination.

Diversity, Equity, Inclusion, and Belonging (DEIB) are important factors in BioNTech's success, as different cultures and perspectives contribute to BioNTech's achievements. Moreover, the Company has been 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***

BioNTech respects its employees' right to rest and emphasizes work-life balance, with a focus on managing working hours per day and week. The Company seeks to accommodate the needs of employees for a balanced professional and personal life. BioNTech suppliers and business partners are similarly expected to ensure their employees' right to rest is respected and working hours per day/week are balanced with an adequate recovery time.

### ***Child Labor***

BioNTech prohibits any form of child labor in its operations and supply chain, as defined in ILO Convention No. 138 on Minimum Age and the ILO Convention No. 182 on the Worst Forms of Child Labour. As set forth in the *Supplier Code of Conduct*, BioNTech expects its suppliers and business partners to not accept any form of child labor and to require BioNTech's indirect suppliers to comply with these principles.

***Freedom of Association and the Right to Collective Bargaining***

BioNTech respects the right of all employees to freedom of organization and collective bargaining, as defined in ILO Core Conventions Nos. 87 and 98, and is committed to dialogue-based industrial relations in which employees can express their views without fear of retaliation. BioNTech expects its suppliers and business partners to hold themselves accountable to the same principles.

***Forced Labor***

Any form of forced labor and modern slavery including servitude, involuntary prison labor, human trafficking or child labor is not tolerated – and BioNTech does not form any partnership or business relationship with companies or individuals that might be involved in such practices.

As a global immunotherapy company pioneering novel medicines against cancer, infectious diseases and other serious diseases, BioNTech also focuses on the following human rights aspects:

***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 dedicated to translating science into survival by harnessing the potential of the human immune system to improve the health of people worldwide through innovative immunotherapies and mRNA vaccines targeting cancer, infectious diseases and other serious diseases.

***Access to Innovative Vaccines for Infectious Diseases***

As part of this effort, BioNTech aims to address high and unmet global medical needs, including diseases with pandemic potential – mostly affecting low- and lower-middle income countries.

In line with the Company's ambitions to increase access to novel medicines, if successfully developed and authorized by regulatory authorities, BioNTech plans to work with partners to provide access to potential tuberculosis, malaria, and mpox vaccines to low- and lower-middle income countries.

***Clinical Trials***

BioNTech is committed 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 participants and integrity of the collected data. The protocols of BioNTech's clinical trials comply 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 other applicable laws and regulations.

BioNTech's Ethical Standards, the Company's Transparency Declaration and publication policy are published on the Company's website at <https://clinicaltrials.biontech.com/our-commitment>.

### 5.3. Preventive and Remedial Measures

#### ***Addressing Human Rights in Business Processes***

Relevant preventive measures are taken as part of standard operating processes and company policies and guidelines particularly in the areas of Safety, Health & Environment, Human Resources, Global Security & Protection and Clinical Studies. For proactive supplier risk management, BioNTech uses an internal "Supplier ESG Score" in its tendering and procurement processes that has to be taken into consideration in the supplier selection. Standard operating procedures have been adjusted accordingly.

BioNTech continuously monitors and evaluates its measures to identify, prevent, mitigate, and remediate adverse human rights and environmental impacts, adapting them as necessary in response to findings from its risk analysis and due diligence processes.

Identified risks and impacts are carefully weighed, reviewed, and prioritized to derive appropriate measures in accordance with the principle of adequacy. BioNTech prioritizes the implementation of effective and appropriate remedial actions to prevent, address, or minimize the effects of potential adverse impacts.

#### ***Capacity Building and Training***

BioNTech provides training on policies applicable to BioNTech's Representatives roles. BioNTech's policies, e.g., the *Code of Ethics & Business Integrity*, are trained through repeated exercises and thorough explanations in mandatory interactive virtual training, on-site training, online videos, and awareness training.

Employees involved in human rights and environmental risk management receive appropriate training; knowledge building is fostered by, e.g., thematic awareness-raising sessions. Procurement colleagues are also trained and advised in the application of the "Supplier ESG Score".

Furthermore, responsible employees are advised and supported by internal and external human rights experts.

#### ***Risk-based Control Measures***

BioNTech conducts risk-based audits. Any findings will be mitigated through appropriate measures.

### **5.4. 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 *SpeakUp Policy*, these concerns are 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 utilized.

### **5.5. Reporting, Monitoring and Documentation**

BioNTech regularly publishes information on its human rights due diligence obligations, for example in its Sustainability Report. The Sustainability Report as well as the Human Rights Statement and respective Modern Slavery Statements can be accessed on the Company website <https://investors.biontech.de/corporate-governance/overview>.

The effectiveness of BioNTech's human rights and environmental risk management and due diligence processes is reviewed annually and, on an ad-hoc basis. BioNTech commits to retain corresponding documentation for seven years to respond to legal requirements.

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

Human Rights Officer

#### **Contact Details:**

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