



# RULES OF COMPLAINTS PROCEDURE

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## 1. Introduction to the BioNTech complaints procedure

The BioNTech SE Management Board is committed to fostering a culture of integrity and trust and encourages BioNTech Representatives and external parties to raise any concerns they may have about misconduct. Any person can report any actual or potential misconduct related to BioNTech or its business partners.

Actual or potential misconduct could be any action or omission which is not in line with:

- Laws, regulations, or industry codes applicable in any jurisdiction in which BioNTech conducts business, including, but not limited to Internationally recognized human rights or environmental regulations and standards,
- The BioNTech Code of Ethics and Business Integrity and the Supplier Code of Conduct as well as BioNTech Policies & Guidelines,
- Any other internal and formalized rule or procedure.

Potential misconduct includes reasonable uncertainties, questions, concerns etc.

These Rules of Procedure explain in detail what you can do in case of concerns about actual or potential misconduct.

The **BioNTech Ethics Contact Point** offers you a simple way to report concerns, also anonymously.

Each reported incident is treated objectively and impartially by independent examiners.

Your report can help us to avoid potential violations, support the people affected and improve risk mitigating measures.

**Your voice matters!**

## 2. What kind of incidents can you report?

You can report any concern about potential or actual misconduct to us. These can relate, for example, to the following topics (*the list is not exhaustive*):

- fraud, theft or corruption,
- breaches of financial accounting rules or tax law,
- antitrust violations and potential conflicts of interest,
- discrimination or harassment,
- unlawful working conditions,
- human rights risks or impacts, such as child labor, forced labor, disregard for health and safety protections, impact on communities' livelihoods,
- environmental risks or impacts, such as water or air pollution, excessive water consumption, mishandling of hazardous substances, improper handling of waste,
- violations of BioNTech's Code of Ethics & Business Integrity and/or Supplier Code of Conduct, and
- any breach of applicable laws and regulations.

## 3. Who can report a concern?

The BioNTech Ethics Contact Point is open to any person with concerns about potential or actual misconduct related to BioNTech and/or its business partners.

You can also report an incident or concern even if you are not directly involved. You can also ask someone to submit a report on your behalf, if you are not be able to do so.

## 4. How can you report your concerns?

Any person can report their concern through any of the following reporting channels:

- [BioNTech Ethics Contact Point](#) (see Appendix 1 for details and how to use the tool)
- via email to [compliance.business.ethics@biontech.com](mailto:compliance.business.ethics@biontech.com)
- via letter:

BioNTech SE  
Compliance & Business Ethics department  
An der Goldgrube 12  
D-55131 Mainz

- via phone:
  - Austria: 0800-017-895
  - China: 400 120 9246
  - Germany: 0800-180-6531
  - Rwanda: (+256) 41 4238183
  - Singapore: 800-492-2343
  - Turkey: 0800 621 2556
  - United Kingdom: 0800-041-8818
  - United States: 1-800-503-8361

Regardless of the submission method you choose (i.e., via the BioNTech Ethics Contact Point, email to the Compliance & Business Ethics department, letter, phone or in-person), your report will be handled with the utmost diligence and confidentiality.

You can choose to provide your identity or report anonymously via the [BioNTech Ethics Contact Point](#).

## 5. What happens once you submit a report?

BioNTech is committed to maintaining the highest confidentiality standards when dealing with your report. Additionally, we will ensure to analyze your concerns in an unbiased manner and in accordance with all applicable laws and regulations.

The reports received are analyzed by specifically trained personnel of the Compliance & Business Ethics department. All data provided to us will be processed in accordance with the applicable data privacy rules and regulations.

Below we compiled a summary of the procedural steps once you submit a report:

### 5.1 Allegations receipt

We will confirm receipt of your report within seven days of receipt.

### 5.2 Preliminary Research

Independent examiners will review your report and get back to you in case of additional questions.

### 5.3 Investigation

Trained personnel will examine the report. Depending on the topic, other experts from BioNTech (e.g., from Human Resources, Procurement, Corporate Social Responsibility, Data Privacy, etc.) might need to be involved - while always adhering to the principle of confidentiality, protection of the reporting person's identity and data privacy rules and regulations.

### 5.4 Report and Corrective Measures

BioNTech is committed to taking adequate and effective measures to address any confirmed incident. If the violation or risk concerns our company, the risk will be mitigated, and the violation will be stopped. If the reported violation or risk concerns one of our suppliers, BioNTech will seek immediate mitigation measures. Existing preventive or remedial measures are to be updated as needed should concerns provide cause to do so.

The Investigations Team within the Compliance & Business Ethics department will inform you in general terms of the corrective measures and envisaged solutions.

Corrective measures will depend on the nature and severity of the confirmed violations.

### **5.5 Closure of procedures and communication**

Three months upon receipt of your report, we will provide you with feedback on the matter you have reported. If the examination of the case takes longer than three months, we will keep you informed.

The examination of a reported incident can be closed as follows:

- there is no sufficient information to investigate the matter and/or actual or potential breach was not confirmed,
- actual or potential breach was partially or completely confirmed.

In case BioNTech can confirm the reported violations, adequate corrective measures will be implemented. These can vary depending on the seriousness of the violation and include e.g., HR measures, contract termination, procedural adjustments.

We will provide you with a notification once the examination has been completed via the messenger of the Ethics Contact Point or email (in case you have provided us with a specific contact point).

## **6. How will we protect you?**

BioNTech does not tolerate retaliation against anyone who reports an incident in good faith (i.e., the reporting person had reasonable grounds to believe that the actual or potential misconduct occurred or will occur).

This also applies to cases where the reported incident has not been confirmed.

If you experience retaliation because of your report, please do not hesitate to contact us either through the BioNTech Ethics Contact Point or via the other channels as described above.

## **7. Who is responsible for the complaints procedure?**

BioNTech's complaint procedure is steered centrally by the Global Investigations team within the Compliance & Business Ethics department of BioNTech SE.

### **Where can you get more information on BioNTech's commitments and expectations?**

If you would like to know more about our own commitments and our expectations towards our business partners, please refer to:

- [Code of Ethics & Business Integrity](#)
- [Supplier Code of Conduct](#)
- [Human Rights Statement](#)

**Your voice matters!**

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

Compliance & Business Ethics

**Contact Details:**

[SpeakUp@biontech.com](mailto:SpeakUp@biontech.com)

## Appendix 1: The BioNTech Ethics Contact Point and how to use it

Our BioNTech Ethics Contact point tool allows you to report any concern regarding any actual or potential misconduct at any time. You can either provide your name or send the report anonymously.

The tool is available in the countries in which we conduct business. Currently, the tool is available in German, English and French.

You can reach the tool here: [BioNTech Ethics Contact Point](#)

If you prefer not to disclose your identity in your report, you can set up a password and case ID to communicate with the examiner responsible within the Investigations Team of the Compliance & Business Ethics department.

To access your report, you should provide the case ID and the password. The examiners will have access to the information provided and will not be able to identify you unless you reveal your identity. There are four steps in the reporting process:

1. You will be asked about the specific nature of your concern and information you might have about it.
2. In a second step, you will be asked about the type of incident you would like to report along with the time/period it occurred and involved person.
3. You will then be asked about people who are potentially aware of the situation.
4. We also kindly ask you to provide us with any document or other evidence that supports your report via the upload function of the online form below.
5. Once you have submitted a report via the online form, you will receive a confidential case report number and password. With these credentials you can log in to the Ethics Contact Point to check for changes to the status of your case and/or communicate (anonymously, if preferred) with BioNTech's Compliance & Business Ethics department via the chat function.

If you prefer to report your concern via the hotline, you have to choose one of the available phone numbers, as per the list provided on the [BioNTech Ethics Contact Point](#).

Upon your request, you can resort a different language than English to provide your report. You can provide your report in the following countries: Germany, United States, United Kingdom, Rwanda, Turkey, Austria, China and Singapore.



During the call, you will receive a confidential case ID number and a password. With this information you can log in into the BioNTech Contact Point and check updates and messages from the examiners.