

# Rules of Procedure for the Complaints Mechanism – “Speak Up”

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## 1 PURPOSE AND SCOPE OF APPLICATION

At CureVac, we are committed to respecting all applicable laws, regulations, and human rights principles while also safeguarding the environment. CureVac's success is interconnected with its commitment to ethical behavior. We have established an extensive range of measures to safeguard this commitment, which are outlined in our Human Rights Policy Statement on the Human Rights Strategy.

CureVac cultivates a culture of open communication, where employees, direct and indirect suppliers, as well as individuals impacted by CureVac's economic activities or those of our suppliers, or their representatives, can freely ask questions or report potential instances of misconduct without fear of retaliation. We strongly encourage everyone to engage in respectful and timely dialogue regarding any issues or concerns they may have.

This proactive approach serves as an early-warning system, enabling CureVac to address emerging risks or violations promptly and effectively. Through the implementation of suitable measures such as preventive measures or remedial actions, we aim to mitigate or resolve issues at an early stage.

Our complaints mechanism rules of procedure are designed to preserve the integrity of our Company and supply chain by ensuring the reporting and investigation of any Compliance violations or concerns, including human rights and environmental violations in the supply chain, thereby meeting our high standards of ethical behaviour at all times and protecting our reputation and avoiding financial losses.

Complaints received by CureVac will be taken into account during risk analysis and the implementation of preventive measures and remedial actions, in accordance with applicable laws and regulations such as the

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German Supply Chain Due Diligence Act (SCDDA). CureVac acknowledges the importance of addressing these complaints and incorporating the outcomes of the complaints mechanism into its decision-making processes.

These rules of procedure aim to provide clear and transparent information about the key characteristics, accessibility, process flow, and responsibilities related to our complaints mechanism, as mandated by Section 8 (2) of the SCDDA.

## 2 WHO CAN REPORT?

Violations and concerns can be reported under our complaints mechanism Speak Up by anyone – employees and third parties (e.g. suppliers).

## 3 WHICH VIOLATIONS AND CONCERNS CAN BE REPORTED?

Violations mean violations of national or international law, violations of our Supplier Code of Conduct and/or Ethics and Company policies (e.g. our CureVac Code of Conduct). Violations and concerns in the CureVac group (our own business division) as well as along our supply chain which may be reported, include, amongst others:

- Risks linked to human rights or environmental impacts
- Human rights violations;
- Environmental violations;
- Corruption offenses;
- Fraud and embezzlement as well as other property offenses;
- Infringements of data protection;

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- Competitive misconduct;
- Discrimination and harassment.

Human rights or environmental risks or (imminent) violations may in particular concern the principles and rights listed in our Human Rights Policy Statement.

All above violations and concerns are hereinafter referred to as “violations”.

### 4 HOW CAN YOU REPORT?

Information can be submitted in person, by telephone, by e-mail, by mail or via the anonymous reporting tool on the Intranet / Internet using the following link [["Speak-Up"](#)] and/or the contact details below:

Point of contact:	Compliance Officer
Email contact:	Complianceofficer@curevac.com
Telephone contact:	+49 7071/9883-3131
Postal address:	Personal/confidential Compliance Officer Friedrich-Miescher-Str. 15 72076 Tübingen Germany

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### 5 COMPLAINTS MECHANISM PROCESS

#### 5.1 GENERAL

All violations reported will be gathered and will under a first review of the Compliance Officer for preliminary be checked. During these checks, an initial assessment of the conclusiveness of the information, the nature and severity of the alleged violation and identification of the person/s (if any) involved are carried out. Based on the results of this assessment, the Compliance Officer derives the violation’s provisional categorization and will consult with the relevant functions within the company and/or forward the reported violation to the relevant experts. This is done in compliance with the relevant laws and on a strict need to know basis.

#### 5.2 COMPLIANCE COMMITTEE AND SUSTAINABILITY PANEL

CureVac has further set up an internal Compliance Committee and a Sustainability Panel to ensure the professional, swift processing of the complaints under the complaint mechanism. The Committee and/ or the Sustainability Panel support the Compliance Officer in his work where necessary. The Sustainability Panel, supervised by our Human Rights Officer (HRO) is responsible if there is a violation of human rights or environmental obligations. The Compliance Committee (together with the Compliance Officer) is responsible for all other reports.

The individuals forming the Compliance Committee and the Sustainability Panel as well as the Compliance Officer offer a guarantee of impartiality. They are independent and not bound by instructions while being bound to strict confidentiality. They are adequately trained and have sufficient time resources to deal with the complaint appropriately.

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### 5.3 INVESTIGATION OF FACTS

After the preliminary checks, the Compliance Officer conducts a deeper review. If contact details have been provided, the Compliance Officer will contact the complainant to clarify the facts. Throughout the complaints process, the complainant will be involved in an appropriate manner and may contribute to the development of preventive or remedial measures if deemed necessary.

In the event that the report cannot be substantiated, the Compliance Officer will proceed to close the case and promptly notify the complainant of the outcome.

If the Compliance Officer concludes that a further investigation into the facts is required, concerns are investigated in more detail.

If necessary for the investigation of the concern reported, the Compliance Officer will also consult with the relevant departments (e.g. Procurement, Legal & Compliance or other). This is done in compliance with the relevant laws and on a strict need to know basis.

Depending on the concern, investigations may require the company to gather further information or statements from third parties (e.g. affiliates, suppliers or other) who may in turn need some time to investigate facts further at their end.

Once the investigation has been conducted, it will be decided how the concerns and results are best dealt with and which measures may be appropriate and effective.

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### 5.4 INVOLVEMENT OF THE INDIVIDUAL IN THE PROCESS

The confidentiality of the process and the identity of the individual is ensured during the whole process. The individual submitting a report shall be notified of the results of the investigation and the proposed measures will be discussed with the individual to find the most adequate action plan.

Adequate and effective measures are afterwards implemented by CureVac.

### 5.5 INDIVIDUAL QUESTIONS; TIMELINE

- **Do I get a confirmation of receipt of my report?** When the concern is reported through the Internet / Intranet or e-mail, the complainant receives a confirmation e-mail (if a contact e-mail address is given) within the next 7 days.
- **How do reports via telephone work?** If the complainant reaches out to the Compliance Officer by telephone, the individual will be able to describe and report any concerns in German or English. If the complainant should speak another language, the Compliance Officer will organize a translator. Depending on the language, the Compliance Officer may need to schedule another call with the complainant or ask the complainant to report the concern via the Internet or e-mail.
- **How long does the investigation take?** After the concern has been noted down, the internal investigation procedure as outlined above will be initiated. CureVac shall undertake to keep the timeframe of the investigation and clarification of concerns and possible measures to be taken as short as necessary and ideally conclude it within weeks instead of months; however, an adequate and effective investigation of the facts may require deeper investigations and inquiries with third parties to which in turn an adequate time frame needs to be given in order to provide the required statements.

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- **How long until the individual hears back from the company?**

CureVac strives to be able to get in contact with the complainant to discuss proposed countermeasures within three months.

### 5.6 ANONYMITY

The individuals can decide if they wish to submit the report anonymously (e.g. via the anonymous reporting tool on the Intranet or by ticking the respective box on the Internet tool) or to disclose their own identity. Disclosure of identity makes it easier to investigate the facts of the matter but is by no means expected.

Any information supplied is treated strictly confidential and is only used for the purposes of investigating any potential violations.

### 5.7 REVIEW OF EFFECTIVENESS

The effectiveness of the complaints’ mechanism is reviewed on an ad hoc basis if needed, but at least once a year.

## 6 PROTECTION AGAINST RETALIATION

CureVac does not tolerate retaliation against anyone who reports in good faith and conscience (i.e. for non-malicious purposes). Retaliation is considered a serious offense and may result in disciplinary measures, including dismissal.

## 7 DOCUMENTATION AND DATA PROTECTION

The Compliance Officer along with all individuals involved in the complaints handling process, are bound by strict confidentiality obligations. Access to information is limited and will only be disclosed to individuals on a genuine



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need-to-know basis in order to effectively address the compliant or fulfill legal obligations of CureVac.

CureVac adheres to applicable laws and regulations concerning the collection, processing, and storage of personal data. As per relevant laws and regulations, CureVac is required to document the complaints mechanism and each complaints procedure. Sec. 10 (1) SCDDA applies.

### 8 VALIDITY

This policy was approved by the Management Board on December 1, 2023 and updated on January 16, 2024 as a corporate policy. This policy comes into effect upon publication and replaces any previous versions.