

# Supplier Code of Conduct

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# Introduction



CureVac is pioneering the development of therapeutic products based on the messenger RNA molecule. As the RNA people, we are developing sustainable RNA products for the benefit of our society, and we are committed to operating in accordance with the highest ethical standards. To this end, we continuously strive for sustainability and ethical behavior in products and solutions, and combine economic success, social responsibility and environmental protection in our business operations to enable our customers and patients to meet the current and future needs of society. Our suppliers have expertise and capabilities that we use to improve our efficiency, effectiveness and business continuity to deliver medical innovations that meet the needs of our customers and patients, and benefit society. Accordingly, CureVac seeks to conduct business with third parties including, but not limited to, complementary workers, advisers, suppliers, and other business partners (collectively, "**Suppliers**") who share our commitment to the highest ethical standards and operate in a sustainable, responsible and ethical manner.

This Supplier Code of Conduct is part of the contractual relationship with all suppliers and forms the basis for the cooperation between CureVac and its Suppliers. In this Code of Conduct, CureVac defines the requirements that must be met by all of its Suppliers. The cooperation between CureVac and its Suppliers is based on a culture of trust, mutual respect, openness, a fair balance of mutual interests and equal opportunities. Both parties are aware that compliance with applicable laws and regulations and the observance of social and environmental standards are the basis for a lasting and successful business cooperation.

We expect our Suppliers to fully comply with applicable laws and to adhere to internationally recognized environmental, social and corporate governance standards (ESG standards). Ensuring that these principles are enforced in our supply chain is important to us. Therefore, we require our Suppliers to comply with these principles and to develop and adapt their supply chains accordingly. Subsequently, we expect our Suppliers to ensure that their own suppliers adopt standards that cover the same principles as contained in our Supplier Code of Conduct.

We particularly expect our Suppliers to support, embrace and enact the ESG standards, which are based in particular on the Pharmaceutical Industry Principles for Responsible Supply Chain Management, the Ten Principles of the United Nations Global Compact, the United Nations Guiding Principles on Business and Human Rights, OECD Guidelines for Multinational Enterprises and the conventions of the International Labour Organization.

Suppliers and employees, managers, and comparable personnel of Suppliers are encouraged to report suspected violations of law, regulations, this Supplier Code of Conduct and CureVac policies and guidelines either through internal reporting channels or through CureVac's "Speak Up" channels. This includes reporting misconduct by CureVac's employees, managers, members of the board, directors or comparable personnel ("**CureVac Personnel**") with whom they do business.

This Supplier Code of Conduct contains general requirements that apply to all CureVac Suppliers. Individual supplier contracts may contain more specific provisions addressing some of these requirements. Nothing in this Supplier Code of Conduct is intended to supersede more specific provisions in a particular contract, and to the extent there is any inconsistency between this Supplier Code of Conduct and other provisions of a particular contract, the contractual provision shall prevail. If local laws, regulations or customs are stricter than this Supplier Code of Conduct, these local laws, regulations and customs shall prevail.

In case of violations of applicable laws and/or regulations, this Supplier Code of Conduct or CureVac's policies and guidelines by a Supplier, CureVac shall be entitled to terminate, in accordance with the applicable contracts, laws and/or regulations, the entire cooperation and all existing business relationships with the Supplier, including all existing framework and individual contracts, submitted purchase orders or similar legal relationships.

If a Supplier becomes aware of a violation of the values or principles contained in our Supplier Code of Conduct by one of its suppliers operating in its supply chain in connection with CureVac, the Supplier shall immediately inform CureVac and shall ensure that the situation is immediately remedied (e.g., by terminating the engagement of the relevant supplier or suspending the contractual relationship until the deficiency has been remedied).

As part of Suppliers onboarding process, as well as for on-going Supplier relationships, CureVac reserves the right to conduct supplier screenings to ensure compliance with this Supplier Code of Conduct. As part of the screening process, Suppliers are required, at CureVac's request, to complete a self-assessment questionnaire and submit it to CureVac in a timely manner. CureVac may further verify compliance by its Suppliers with this Supplier Code of Conduct through inspection of documentation and records of the respective Supplier and/or an on-site visit at the premises of the respective Supplier. Such audit right exists during the usual opening hours at the Supplier's premises and can be exercised by CureVac or by third parties commissioned by CureVac.

## Key required actions for Suppliers:

- Understand CureVac's requirements, all applicable laws and regulations, and CureVac's policies and guidelines.
- Report all facilities that manufacture products, provide services and conduct an approved audit of these facilities.
- Take immediate action in the event of violations of human rights and environmental standards established in particular in this Supplier Code of Conduct.
- Be committed to upholding human rights and environmental standards in their subsequent supply chain and encourage their suppliers to uphold and continuously improve human rights standards.
- Develop a corrective action plan to address issues related to human rights and environmental standards established in this Supplier Code of Conduct.
- Continuously monitor working conditions within their own company and in relation to their own subsequent supply chain.



## Human rights and labor

Suppliers shall respect the human rights of their employees and treat them with dignity and respect. We also expect our Suppliers to adhere to core international labor standards that are in line with the International Labour Organization (ILO) conventions. What we expect from our Suppliers includes:

## Human rights

Suppliers must support and respect the protection of internationally proclaimed human rights in their company and in their subsequent supply chain and ensure that they do not participate in any form of human rights violations.

## Freely chosen employment

Our goal is to have a positive impact on the lives of our employees, their families and the communities in which we operate, and we expect the same commitment from our Suppliers.

Suppliers shall not use forced labor, bonded or indentured labor, or involuntary prison labor. Suppliers shall provide their employees with written employment contracts in compliance with local legislation. Suppliers' employees may also not be required to provide deposits upon commencement of work. In addition, employees shall have the right to terminate their employment relationship with the Supplier after giving a reasonable period of notice.

## Child labor and young employees

Suppliers shall not use child labor. The employment of young employees under 18 years of age may only take place for non-hazardous work, provided that the local working hours for young employees are observed and the

young employees are above the legal minimum age for employment in the relevant country or the age for completion of compulsory education.

## Non-discrimination

Suppliers shall provide a workplace free of harassment and discrimination. Discrimination for reasons such as color, age, gender, sexual orientation, ethnicity, disability, religion, belief, political affiliation, union membership or marital status is not tolerated.

## Fair treatment

Suppliers shall provide a workplace free from harsh and inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse, bullying of employees and any threat of such treatment.

## Working environment

We expect our Suppliers to maintain open communication and direct dialogue with their employees to resolve workplace and compensation issues.

## Wages, benefits and working hours

Suppliers shall ensure that the wages (including overtime pay), working hours, vacations and absences of employees and subcontractors comply with applicable laws and/or

contracts and shall ensure that their employees are paid a living wage in accordance with local living conditions. Suppliers shall communicate with their employees the basis on which they are being compensated in a timely manner. Suppliers are also expected to communicate with their employees whether overtime is required and the wages to be paid for such overtime. Regular working hours and overtime may not exceed the statutory maximum limits. If required by law or requested by CureVac, Suppliers must provide written agreements in their native language that include all minimum information required by law.

## Freedom of association and representation

Open communication and direct engagement with employees to resolve workplace and compensation issues is encouraged. Suppliers shall respect the rights of employees, as set forth in local laws, to associate freely, join or not join labor unions, seek representation, join workers' councils and to voice their concerns about important issues in a lawful manner. Employees shall also be able to communicate openly with management regarding working conditions without threat of reprisal, intimidation or harassment. The right to negotiate collectively may not be restricted.

## Human rights management system

Suppliers shall have a human rights management system in place to ensure that these standards are met.



# Ethics

Suppliers must conduct business in an ethical manner and act with integrity. What we expect from our Suppliers includes:

## Business integrity

All forms of bribery, corruption, extortion and embezzlement are prohibited. Suppliers shall not pay or accept bribes or engage in bribery or other illegal inducements in business relationships or government relationships.

We believe in building mutually beneficial relationships with our Suppliers based on integrity, trust and respect.

## No bribery and no corruption

We comply with all applicable laws and regulations of the countries in which we operate, and we expect our Suppliers to do the same.

Conducting business may occasionally involve business-related entertainment or exchanges of gifts of nominal value. However, Suppliers shall not offer any gift, meal or entertainment to CureVac Personnel or a third party (including public officials) in a situation where it could influence or appear to influence the decisions of CureVac Personnel or the third party (including public officials) *vis-à-vis* the Supplier.

## Duty to notify CureVac of bribery/corruption

Suppliers shall inform CureVac of any solicitation, demand, pressure or coercion of any kind to offer bribes (any kind of advantage) directly or indirectly to public officials or other parties (including CureVac Personnel) with the intent to influence or obtain an improper advantage.

## Fair competition

Suppliers shall conduct business in a fair, equitable and competitive manner and in accordance and compliance with all applicable antitrust and competition laws and regulations. Suppliers shall strictly comply with the letter and spirit of antitrust and competition laws and regulations in all applicable jurisdictions. Suppliers shall also engage in fair business practices, including accurate and truthful advertising.

## Insider information

Suppliers should never communicate externally about CureVac's prospects, performance, policies or guidelines, nor disclose inside information that could affect the price of CureVac securities without appropriate prior authority. Suppliers are also prohibited from publicly disclosing confidential or proprietary information relating to any aspect of CureVac's business.

## Conflict of interest

Suppliers shall avoid interactions with CureVac Personnel that conflict, or appear to conflict, with the CureVac Personnel's actions in the best interest of CureVac. For example, Suppliers should not employ or otherwise make payments to any such CureVac Personnel in a transaction between the Supplier and CureVac that is not governed by a CureVac contract. If a Supplier or any of its employees, managers, members of the board, directors or comparable personnel has a relationship with CureVac Personnel that could potentially constitute a conflict of interest, the Supplier shall disclose that fact to CureVac.

## Product quality

Suppliers involved in the development, manufacture and testing of materials/products shall ensure compliance with all agreed quality requirements and all otherwise applicable quality standards (namely good manufacturing practices and good laboratory practices) for the markets for which the materials/products are intended. Suppliers may implement changes to the development, manufacture and testing of materials and products only with the prior consent of CureVac, except to the extent expressly otherwise agreed. Critical issues that may adversely affect the quality of materials/products made for or supplied to CureVac must be notified immediately to CureVac and remedied without delay. Documentation or data relevant to the development, manufacturing and testing of materials and products shall be original, accurate, legible, controlled, retrievable, and protected from intentional or unintentional tampering or loss. Suppliers shall also comply with all record retention requirements established by local authorities and those specified by CureVac.

## Animal welfare

At CureVac, we believe we have a moral responsibility for the welfare and treatment of animals. Animals must be treated humanely, minimizing pain and stress. Animal testing shall be conducted using accepted and state-of-the-art methods, considering whether to replace animals as test subjects, replace the number of animals, reduce the number of animals used, or refine procedures to minimize animal distress. Alternatives should always be used if they are scientifically proven and acceptable to regulatory authorities.



## Export and import regulations, sanctions and embargoes

Suppliers shall comply with all applicable laws and regulations governing the export and import of goods, products and services, including those relating to economic and trade sanctions and embargoes to the extent permissible under German and EU antiboycott laws.

## Responsible supply chain

To ensure a responsible supply chain for goods and services with respect to human rights and environmental standards, Suppliers involved in CureVac's supply chain must establish and adhere to compliance processes and procedures in accordance with the German Supply Chain Act (*Lieferkettensorgfaltspflichtengesetz [LkSG]*), the Dutch Child Labor Due Diligence Law (*Wet zorgplicht kinderarbeid*) and comparable applicable laws and/or regulations, including such EU Member State laws enacted so as to implement an EU Directive on Corporate Sustainability Due Diligence. All suppliers along the supply chain – from the extraction of raw materials / rendering of services to the delivery to the end customer – must comply with the standards of the German Supply Chain Act, the Dutch Child Labor Due Diligence Law and other comparable applicable laws and/or regulations and inform their personnel and subsequent suppliers thereof, even if it is not directly applicable to the supplier. Subsequently, we expect our Suppliers to ensure that their own suppliers adopt standards that cover the same principles as contained in our Supplier Code of Conduct.

## Supplier diversity

Suppliers shall embrace the social and economic diversity of their suppliers through inclusive procurement processes that promote equal opportunity.

## Accuracy of business records

All financial books and records of our Suppliers shall conform to generally accepted accounting principles and applicable laws and regulations. Records shall be complete and accurate in all material respects. Records must be legible and transparent and reflect actual transactions and payments. Suppliers must not use "unofficial" or similar means.

## Cooperation with government agencies

Suppliers shall cooperate with government agencies responsible for enforcing compliance with laws or regulations to the extent required by local laws or regulations. If necessary, Suppliers shall notify the appropriate government agency when they receive credible information that an employee, supplier, contractor or subcontractor has violated local laws or regulations.

## Intellectual property and trade secrets

CureVac delivers medical RNA technology-based innovations that improve people's health and quality of life by partnering with Suppliers who can best meet our business needs and requirements in terms of cost, innovation, integrity, quality, suitability, credibility and sustainability. As a Supplier supporting CureVac's efforts, Suppliers must respect CureVac's intellectual property rights, protect CureVac's trade secrets and confidential

information, and safeguard patient and customer information. Suppliers must therefore handle technology and know-how in a manner that protects intellectual property rights, proprietary rights and trade secrets.

## Privacy

Suppliers shall adequately protect confidential and personal information of, e.g., the company, suppliers, employees, contractors, patients and customers. In any case, the use and disclosure of such confidential and personal information must be limited to the purposes for which it was obtained in order to protect the privacy of individuals.

## Identification of concerns

All Supplier employees, managers and comparable personnel should be encouraged to report concerns or illegal activities in the workplace without threat of reprisal, intimidation or harassment. Suppliers shall then investigate incidents and take corrective action as needed.



## Health and safety

Suppliers shall provide a safe, secure and healthy working environment for its employees and the community. What we expect from our Suppliers includes:

## Protection of employees

Suppliers shall provide safe and hygienic working conditions in accordance with all applicable laws and regulations.

Suppliers must protect their employees from unnecessary exposure to chemical, biological and physical hazards, as well as from physically demanding tasks in the workplace and in company-provided living quarters.

It is important to us that Suppliers provide a safe and healthy work environment for employees and the community.

## Process safety

Suppliers shall have programs in place to prevent or contain hazardous chemical releases. Suppliers shall have programs in place to prevent and mitigate catastrophic incidents related to their operations and processes. These programs shall be appropriate to the risks of their production facilities.

## Training and emergency preparedness

Employees shall be trained to contribute to a safe work environment. Suppliers shall additionally have programs in place to prevent accidents and to prevent or reduce the release of chemicals.

Suppliers shall identify and assess emergency scenarios in the workplace and in company-provided housing and minimize their impact through the implementation of emergency plans and response procedures.

## Hazardous materials information

Safety information on hazardous materials – including pharmaceutical compounds and pharmaceutical intermediates – shall be available to educate, train and protect employees from hazards.





## Protection of our environment



Suppliers shall operate in an environmentally friendly and efficient manner and work efficiently to avoid adverse impacts on our environment. Suppliers are required to conserve natural resources and energy, avoid or reduce the use of hazardous materials and participate in activities that promote reuse and recycling. Suppliers are encouraged to promote social and economic development and environmental protection in their company and in their subsequent supply chain and to contribute to the development of sustainable communities in which the companies of the CureVac supply chain are located. What we expect from our Suppliers includes:

## Environmental standards

Our objective is to make a positive contribution to ensuring that all people live in a healthy environment. Therefore, we strive to conserve our environmental resources and reduce our carbon footprint. We expect the same commitment from our Suppliers.

Suppliers shall be committed to a precautionary approach to environmental protection. Suppliers shall therefore support and respect the protection of our environment (in accordance with applicable local standards) and commit to the sustainable use of resources in their business and subsequent supply chain. Suppliers shall also ensure that they do not engage in any form of pollution or wasting of resources. Suppliers shall in particular also abide by the restrictions set forth in the Minamata Convention on Mercury and the Stockholm Convention on Persistent Organic Pollutants.

## Environmental permissions and authorizations

Suppliers must comply with all applicable environmental regulations and laws. All required environmental permits, licenses, information, registrations and restrictions shall be obtained and their operating and reporting requirements followed.

## Waste and emissions

Suppliers shall have systems in place to ensure the safe handling, transfer, storage, recycling and reuse of waste, air emissions and wastewater discharges. Any waste, wastewater or emissions that have the potential to adversely affect human health or the environment shall be appropriately managed, controlled and treated prior to release into the environment. Supplier must in particular abide by the restrictions set forth in the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal.

## Spills and releases

Suppliers shall have systems in place to prevent, minimize and contain accidental spills of fuels, raw materials, chemicals, intermediates, products and other hazardous substances into the environment.

## Environmental management system

Our Suppliers shall have an environmental management system in place to ensure that these standards are met.

## Management system



We expect our Suppliers to have a management system in place that meets the requirements of this Supplier Code of Conduct and is designed to enable continuous improvement and compliance with the expectations of these principles. What we expect from our Suppliers includes:

## **Commitment and accountability**

Suppliers shall demonstrate their commitment to the concepts outlined in this Supplier Code of Conduct by providing adequate resources.

## **Legal and customer/patient requirements**

Suppliers shall identify and comply with applicable laws, regulations, standards and relevant patient and customer requirements and resolve identified gaps in a responsible and timely manner.

## **Risk assessment and risk management**

Suppliers shall have mechanisms in place to identify, assess and manage risks in all areas addressed in this Supplier Code of Conduct.

## **Supplier selection and monitoring**

The standards and values of this Supplier Code of Conduct are the basis of our actions, and we expect that these standards and values are also effectively embedded in the management of our Suppliers.

Suppliers shall apply the principles of this Supplier Code of Conduct in selecting their own suppliers. Suppliers shall have effective systems in place to monitor compliance by their suppliers with applicable laws and regulations as well as with the requirements of this Supplier Code of Conduct. The laws and regulations to be observed also comprise compliance with the applicable supply chain legislation (such legislation exists, for example, in Germany, the UK, France and the Netherlands), including the due diligence of the supply chain. Suppliers shall

confirm to CureVac the implementation of appropriate due diligence measures for the responsible sourcing of goods, products and services throughout their supply chain to ensure compliance with relevant supply chain legislation. Suppliers shall disclose, upon CureVac's request, their supply chain due diligence measures to prevent human rights or environmental violations and to comply with applicable supply chain legislations, and the results thereof, in order to eliminate the possibility of CureVac being supplied with such goods, products or services.

## **Fraud prevention and reporting**

Suppliers shall implement a robust fraud prevention and reporting program. Suppliers are required to report to CureVac all fraud – actual or investigated – affecting CureVac's business, regardless of its significance.

## **Non-retaliation**

Suppliers shall adhere to the principle of non-retaliation, including the expectation that concerns can be reported without fear of reprisal. CureVac will take action, in accordance with local laws and regulations, against any third party who threatens or engages in retaliation or harassment against an individual who has reported or is considering reporting a concern in good faith.

## **Documentation**

Suppliers shall maintain the necessary documentation to demonstrate conformance to the values, expectations and principles outlined in this Supplier Code of Conduct and compliance with applicable laws and regulations.

## **Training and competence**

Suppliers shall have a training program that achieves an appropriate level of knowledge, skills and abilities in management

and staff to meet these expectations. Suppliers shall also ensure that their management and employees have the necessary qualifications, resources and authority to meet these expectations.

## **Identification of concerns**

Suppliers shall offer employees the opportunity to report concerns or illegal activities in the workplace through formal reporting structures. Suppliers shall investigate reported concerns and take corrective action as necessary.

## **Continuous improvement**

Suppliers are expected to continuously improve their operations by setting performance targets, correction plans and taking necessary remedial actions for deficiencies identified at the Supplier or in its supply chain through internal and/or external assessments, inspections, and management reviews.

## **Business continuity plan**

Suppliers are responsible for developing and implementing appropriate business continuity plans for the operations and supply chains that support CureVac's business. These plans should be designed and kept up to date so that partially or fully disrupted critical functions and supply chains can be restored promptly to minimize disruption to CureVac's business and to protect CureVac's reputation.

## **Application to business partners**

Finally, Suppliers shall also impose the values and principles of this Supplier Code of Conduct on their business partners and suppliers.