

## ETHICS HOTLINE POLICY

### 1. INTRODUCTION TO AND PURPOSE OF THE BAVARIAN NORDIC ETHICS HOTLINE POLICY

At Bavarian Nordic, we believe that a commitment to honesty, integrity and ethical conduct is essential to build trust with our patients, customers, suppliers, collaboration partners, employees, shareholders, and the communities in which we operate. Our Code of Conduct describes the ethical principles that characterize our company and the expectations to our employees, our Executive Management and our Board of Directors.

The purpose of this ethics hotline policy ("**Ethics Hotline Policy**") is to describe the Bavarian Nordic Ethics Hotline.

Bavarian Nordic encourages an open and honest culture and will take violations of our Code of Conduct and applicable laws and regulations seriously, listen carefully to anyone who reports possible or actual violations, investigate diligently, when necessary, take appropriate corrective action when needed and protect those who raise their concern about possible violations.

### 2. WHO TO REPORT TO?

If you have knowledge of, or suspect a violation of, the Code of Conduct or relevant laws, you have an obligation to speak up.

As a Bavarian Nordic employee (including volunteers, trainees, or temporary staff working in or for Bavarian Nordic, as applicable), you can do this by reaching out or reporting your concern to any of these (at your own choice):

- your manager
  - *your manager may be able to help investigate or address the concern. If you are not comfortable speaking to your manager, or if appropriate action is not taken to address an issue, you should use one of the other options to raise a concern/report an issue*
- a member of Bavarian Nordic's Business Ethics Compliance Committee
  - *a list of the members is available on Bavarian Nordic's intranet*
- the Legal department
- a member of Executive Management

Whether you are a Bavarian Nordic employee or whether you fall within any of the other categories listed in section 3 below, you always have the option to report your concern through:

- Bavarian Nordic's Ethics Hotline, or
- Any applicable external whistleblower scheme, such as the whistleblower scheme managed by the Danish Data Protection Agency.

We encourage you to use Bavarian Nordic's Ethics Hotline as this will allow us to respond to the reported matter effectively and quickly. However, you are not restricted from using an external whistleblower scheme.

### 3. WHO CAN USE BAVARIAN NORDIC'S ETHICS HOTLINE?

You can use the Ethics Hotline if you are:

- An employee
- A member of the Executive Management or the Board of Directors, or a shareholder
- A former employee or a job applicant
- A volunteer or a trainee (paid or unpaid) working in or for Bavarian Nordic
- A consultant or temporary staff member working in or for Bavarian Nordic

- A person working under the supervision and management of a third party with professional or contractual relationship with Bavarian Nordic, such as contractors, subcontractors, and suppliers
- A customer

#### 4. WHICH MATTERS CAN BE REPORTED?

You can only use the Ethics Hotline to report possible or actual violations of our Code of Conduct and applicable laws and regulations or suspected serious misconduct in activities related to Bavarian Nordic.

The following overview provides examples on what may be reported through the Ethics Hotline:

| What can be reported   | What should <u>not</u> be reported<br>(as outside the scope of the Ethics Hotline)   |
|--|--|
| Violations of Bavarian Nordic’s Code of Conduct, e.g., <ul style="list-style-type: none"> <li>• Misuse of confidential information or intellectual property rights</li> <li>• Serious conflicts of interest</li> </ul>   | <ul style="list-style-type: none"> <li>• Dissatisfaction with pay or lack of promotion</li> <li>• Dissatisfaction with employment terms</li> <li>• Disagreements with colleagues</li> <li>• Minor safety issues in the workplace / Bavarian Nordic facilities</li> <li>• Violations of Bavarian Nordic policies on e.g., dress-code, smoking, alcohol, internet behavior</li> <li>• Customer complaints, product complaints, or adverse events (side effects)</li> </ul> |
| Serious criminal offenses, e.g., <ul style="list-style-type: none"> <li>• misappropriation of funds or assets, including theft</li> <li>• fraud, or forgery of documents</li> <li>• deliberate errors in the preparation of financial statements or records,</li> <li>• misuse of inside information</li> </ul>  |  |
| Bribery or violations of Bavarian Nordic’s business ethics standards, e.g., <ul style="list-style-type: none"> <li>• Payment of bribes or facilitation payments</li> <li>• Unethical gifts, payments, or other transfers of value to Healthcare Professionals (HCPs), Healthcare Organizations (HCOs), or government officials</li> <li>• Misconduct in interactions with HCPs, HCOs, or government officials</li> </ul> |  |
| Serious or repeated violations of legislation and/or serious misconduct related to: <ul style="list-style-type: none"> <li>• Good Clinical Practice (GCP), Good Pharmacovigilance Practice (GVP), Good Manufacturing Practice (GMP), and Good Distribution Practice (GDP)</li> <li>• Environmental laws and regulations</li> <li>• Health &amp; safety laws and regulations</li> </ul>                                   |  |
| Violations of applicable data protection laws<br><i>Note: Personal data breaches must be reported by other means, i.e., Breach Form on the company’s intranet for employees or by contacting Bavarian Nordic DPO at <a href="mailto:dpo@bavarian-nordic.com">dpo@bavarian-nordic.com</a></i>   |  |
| Violations of regional or local antitrust/competition laws   |  |
| Serious misconduct against a Bavarian Nordic employee in the workplace such as: <ul style="list-style-type: none"> <li>• Physical or psychological abuse,</li> <li>• Discrimination,</li> <li>• Harassment, including any form of unwarranted sexual attention</li> </ul>  |  |

## 5. WHO PROCESSES THE REPORT?

Our Ethics Hotline is a secure and confidential reporting channel managed by an independent provider, Got Ethics A/S, and the law firm of Kromann Reumert, who is used to handle such reports confidentially.

If Kromann Reumert's initial screening shows that the report falls within the scope of this Ethics Hotline Policy, it will be forwarded to and further processed by a dedicated and independent Ethics Hotline Committee.

The Ethics Hotline Committee will be subject to strict confidentiality and cannot without your prior consent share your identity with persons outside the Ethics Hotline Committee. See more information under section 10.

## 6. HOW TO REPORT THROUGH THE ETHICS HOTLINE?

### 6.1 Where to submit the report?

You can report via the following link:

<https://bavarian-nordic.whistleblownetwork.net/frontpage>.

The reporting system is available in English, Danish, and German, and you can submit the report in the same languages.

All reports are treated confidentially.

### 6.2 Can the report be submitted anonymously?

You have the option to report anonymously and to remain anonymous in your contact with the Ethics Hotline, although providing your identity may assist the Ethics Hotline in investigating your concern.

If you wish to remain anonymous, you should copy the link into a browser on a private device (not using a Bavarian Nordic device).

Please note that if you wish to report anonymously, you cannot report directly to Bavarian Nordic by any other means.

**Bavarian Nordic cannot guarantee sufficient anonymity and security if you use any other means for reporting than the Ethics Hotline.**

## 7. WHAT INFORMATION SHOULD I INCLUDE IN THE REPORT?

We encourage you to provide as much information as possible about the incident (e.g., how the actions or omissions violate Bavarian Nordic's Code of Conduct or relevant laws and regulations), the person(s) involved, places, dates, and any documentation that you might have to support your report.

The more information you provide the more effective can we investigate and the faster can we take the necessary actions.

All reports must be made in good faith. You should therefore only use the Ethics Hotline to make a report if you have reasonable grounds to believe that the information on breaches reported is true and that such information falls within the scope of this Ethics Hotline Policy.

## 8. HOW IS THE REPORT PROCESSED?

When you make a report via the Ethics Hotline you will receive confirmation of receipt within 7 days. You will also receive feedback from the Ethics Hotline Committee about the steps taken soonest possible and no later than 3 months following the confirmation of receipt of your report.

The report will first be registered and handled by Kromann Reumert.

The law firm will assess whether the report falls within the scope of this Ethics Hotline Policy, and if so, notify Bavarian Nordic's Ethics Hotline Committee, who will then decide whether and how to initiate further investigation into the reported matter.

If the report proves clearly unfounded, it will be rejected, and you will be notified about the rejection as soon as possible after a decision of rejection has been made.

If the preliminary investigation concludes that the report cannot be characterized as clearly unfounded, the reported matter will be investigated further. Further investigation could include collection and review of further information, interviews with the involved employees/persons, or reporting to the police, and it could lead to consequences for the employment of the involved persons.

Unless prevented by the circumstances, the Executive Management will be informed of possible investigations.

Your personal data and identity will not be disclosed to anyone outside the Ethics Hotline Committee, including the Executive Management, without your prior consent.

The person(s) subject to a report will be notified of the report as soon as possible, given the potential investigation, unless Bavarian Nordic's essential business interests, e.g., because of the investigations to be conducted, override the interests of that person.

#### **9. POLICY AGAINST RETALIATION**

Bavarian Nordic does not tolerate retaliation against anyone who raises a concern in good faith about possible misconduct, cooperates or assists with an investigation, or refuses to do something that would violate the Code or the law, even if the refusal results in loss of business to Bavarian Nordic.

Any employee or manager who engages in retaliation will face disciplinary action which could include termination of employment.

#### **10. PERSONAL DATA PROTECTION**

Bavarian Nordic's Ethics Hotline ensures a high level of confidentiality and protection of your personal data.

Your personal data as well as the personal data of the person(s) being reported will be processed in accordance with Bavarian Nordic Ethics Privacy Policy available here: <https://www.bavarian-nordic.com/privacy/ethics-hotline.aspx>.

All personal data will be deleted by the Ethics Hotline when no longer necessary to facilitate investigation or as evidence.

This means we will delete personal data *immediately* when it has been concluded that no sanction will be issued, e.g., because, upon investigation, the matter is concluded to be unsubstantiated or because the matter might be substantiated but not of such severity that a sanction is deemed appropriate.

If the matter leads to a disciplinary sanction against a Bavarian Nordic employee, for example a warning or dismissal, we will store the personal data for in the employee personal file for up to five years after termination of employment.