

DATA ETHICS POLICY

1. INTRODUCTION TO AND PURPOSE OF THE BAVARIAN NORDIC DATA ETHICS 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.

As a fully integrated vaccines company Bavarian Nordic is focused on the development, manufacturing, and commercialization of life-saving vaccines. In a data driven world this involves collection and use of necessary data to ensure health and safety of patients as well as commercialization of our products, a desirable and safe workplace and commercial relations with existing and new customers and partners. Where Bavarian Nordic relies on personal data, we have a responsibility to ensure the protection of the rights and privacy of natural persons involved such as employees, patients, customers, healthcare professionals and partners.

Therefore, Bavarian Nordic has a strong focus on assessing risks, addressing them through appropriate measures and maintaining a high level of information security and compliance with applicable data protection law.

This Data Ethics Policy describes Bavarian Nordic's commitment to a high standard of data processing and summarizes in a transparent manner our ethical values and morals in relation to data and privacy.

2. SCOPE

This Data Ethics Policy applies to all data processing activities carried out by any legal entity within the Bavarian Nordic Group.

Furthermore, to the extent possible, Bavarian Nordic will ensure that third parties carrying out data processing activities on behalf of Bavarian Nordic adhere to the standards set out in this Data Ethics Policy.

3. THE ETHICAL PRINCIPLES GUIDING OUR DATA PROCESSING ACTIVITIES

The following principles form the basis of Bavarian Nordic's responsible processing of data and complement the security and personal data protection measures Bavarian Nordic has already implemented.

3.1 Dedication of the Bavarian Nordic Executive Management

Bavarian Nordic Executive Management has appointed an ESG Committee, which comprises key employees and Members of the Executive Management and which works closely with the Executive Management in ensuring, among others, that our data ethical principles are integrated into our daily work.

Bavarian Nordic Executive Management ensures that the commercial interests of Bavarian Nordic and the use of new data processing technologies within Bavarian Nordic are balanced against the ethical principles set forth in this Data Ethics Policy. In case of activities where the commercial interests of Bavarian Nordic may override the ethical principles set forth in this Data Ethics Policy, the Bavarian Nordic Executive Management shall be notified by the ESG Committee, or by the relevant BN department, and the Bavarian Nordic Executive Management shall then decide whether the activity can be carried out and, if so, how the ethical principles set forth in this Data Ethics Policy are reasonably taken into account.

3.2 Being accountable for data processing

Bavarian Nordic takes responsibility for data processing and ensures that data processing activities are identified, and that processing of personal data is only carried out when necessary and for clearly defined purposes, and in accordance with applicable laws, regulations, and conventions, so as to minimise the risks of unintended consequences from the use of personal data.

3.3 Ensuring ethical data processing carried out by third parties

To the extent that any third party processes data on Bavarian Nordic's behalf, Bavarian Nordic ensures that such third party has committed itself to an appropriate level of data protection and is dedicated to ensuring ethical processing of data.

Bavarian Nordic does not sell data to third parties, and only discloses data to third parties where there are legitimate reasons to do so and where such legitimate reasons have been balanced against the ethical principles set forth in this Data Ethics Policy.

3.4 Ensuring value, transparency, and security

Bavarian Nordic is dedicated to use data to – amongst others - ensure a desirable and safe workplace for employees, health and safety for patients, and to understand and improve relations with customers, healthcare professionals and partners.

Bavarian Nordic communicates its processing activities, including the purposes thereof, to all relevant categories of data subjects to ensure that the data subjects are aware of the processing activities carried out by Bavarian Nordic and their rights related thereto.

Security is an integral part of who Bavarian Nordic is and an integral part of Bavarian Nordic's processing activities. Bavarian Nordic therefore has implemented appropriate security measures as well as data minimization and storage limitation principles to ensure the protection of data and the rights of the data subjects.

3.5 Employees are trained and data processing is monitored

All relevant employees, volunteers, trainees, consultants and temporary staff with access to with Bavarian Nordic's systems receive mandatory, documented, and targeted training in processing of personal data, including compliance with data retention guidelines.

3.6 Ethics Hotline

Bavarian Nordic maintains an Ethics Hotline to ensure that employees, managers, members of Executive Management and the Board of Directors, and our external stakeholders can report any suspicion of violation of applicable data protection laws carried out by Bavarian Nordic or on behalf of Bavarian Nordic.

3.7 Use of new data processing technologies

Bavarian Nordic's use of new technologies such as machine learning, artificial intelligence, and algorithms to process personal data is limited.

Bavarian Nordic Executive Management will work closely with the ESG Committee to assess the use of new technologies to the extent such new technologies are considered introduced in the daily work and where such technologies have significant implications for privacy and processing of personal data.

3.8 Internal control

This Data Ethics Policy is reviewed and approved at least annually by the Bavarian Nordic Executive Management.

Bavarian Nordic ensures compliance with this Data Ethics Policy based on management-approved controls. This Data Ethics Policy forms the basis of the data ethics statement accompanying the management report.