

# Speak-Up Policy

## 1. Introduction & Purpose

Bavarian Nordic (“Company”) is committed to life-saving vaccines which involves acting lawfully and with integrity in our activities throughout the world.

This Policy sets the global standard for speaking up and reporting reasonably suspected breaches of the Company’s Code of Conduct and applicable laws and regulations related to the Company (“Compliance Concerns”).

Compliance Concerns can be reported confidentially and anonymously (subject to local law) using the Company’s Ethics Hotline (<https://www.bavarian-nordic.com/about/business-ethics/ethics-hotline.aspx>).

## 2. Scope & Application

This Policy applies globally to all Company employees, including temporary staff and those employed on fixed-term contracts, Executive Management, and the Board of Directors. This Policy also applies to all Third Parties acting on behalf of the Company.

## 3. Obligation to Report & Cooperate

Company employees, Executive Management, and the Board of Directors, and Third Parties acting on behalf of the Company have an obligation to report Compliance Concerns and to cooperate with internal investigations into Compliance Concerns. This includes prompt production or access to Company information and systems requested by Investigators.

## 4. What Matters Should be Reported?

Reasonably suspected breaches of the Company’s Code of Conduct and applicable laws and regulations related to the Company should be reported (see the Ethics Hotline website for additional local conditions).

### **Reportable Examples:**

#### **Code of Conduct misconduct**

- Employee abuse, harassment, or discrimination in the workplace
- Information security, confidential information, inside information or intellectual property abuses

#### **Business ethics misconduct**

- Corruption, bribery or facilitation payments
- Material conflicts of interest
- Unethical gifts, entertainment, transfers of value, or donations to government officials, healthcare professionals, healthcare organizations, patient organizations, or other business partners

#### **Fraud and accounting misconduct**

- Theft, embezzlement, or invoice fraud
- Accounting manipulation
- Deliberate misrepresentation of statements or records

#### **Unfair competition misconduct**

- Abuse of market position

- Price-fixing

**Serious or repeated violations of legislation and/or serious misconduct related to**

- GxP requirements such as those included in Good Clinical Practice, Good Pharmacovigilance Practice, Good Manufacturing Practice, or Good Distribution Practice
- Other breaches of law or regulations
- Sanctions & export controls
- Data protection laws & regulations
- Note: Personal data breaches must be reported to the Company's Data Protection Officer at [dpo@bavarian-nordic.com](mailto:dpo@bavarian-nordic.com)

**Matters related to contracts with the US Federal Government:**

- Evidence of gross waste, abuse of authority or mismanagement of a US Federal contract or grant or violation of any law, rule or regulation related to a US Federal contract or grant.

**Non-Reportable Examples:**

- Knowingly false or unfounded claims
- Dissatisfaction with compensation, advancement, employment terms, or colleagues
- Minor safety issues in the Company workplace or facilities
- Breaches of the Company's policies which do not raise a reasonable breach of the Code of Conduct or applicable laws and regulations, e.g., dress-code, smoking, alcohol/drug use, internet behaviour
- Customer complaints, product complaints, or adverse events (side effects) (report to [drug.safety@bavarian-nordic.com](mailto:drug.safety@bavarian-nordic.com))

## 5. How to Report

The Company encourages Compliance Concerns to be reported using the following reporting channels:

- Ethics Hotline, or
- Legal & Compliance.

Questions or support, rather than Compliance Concerns, should be raised to Management or Legal & Compliance.

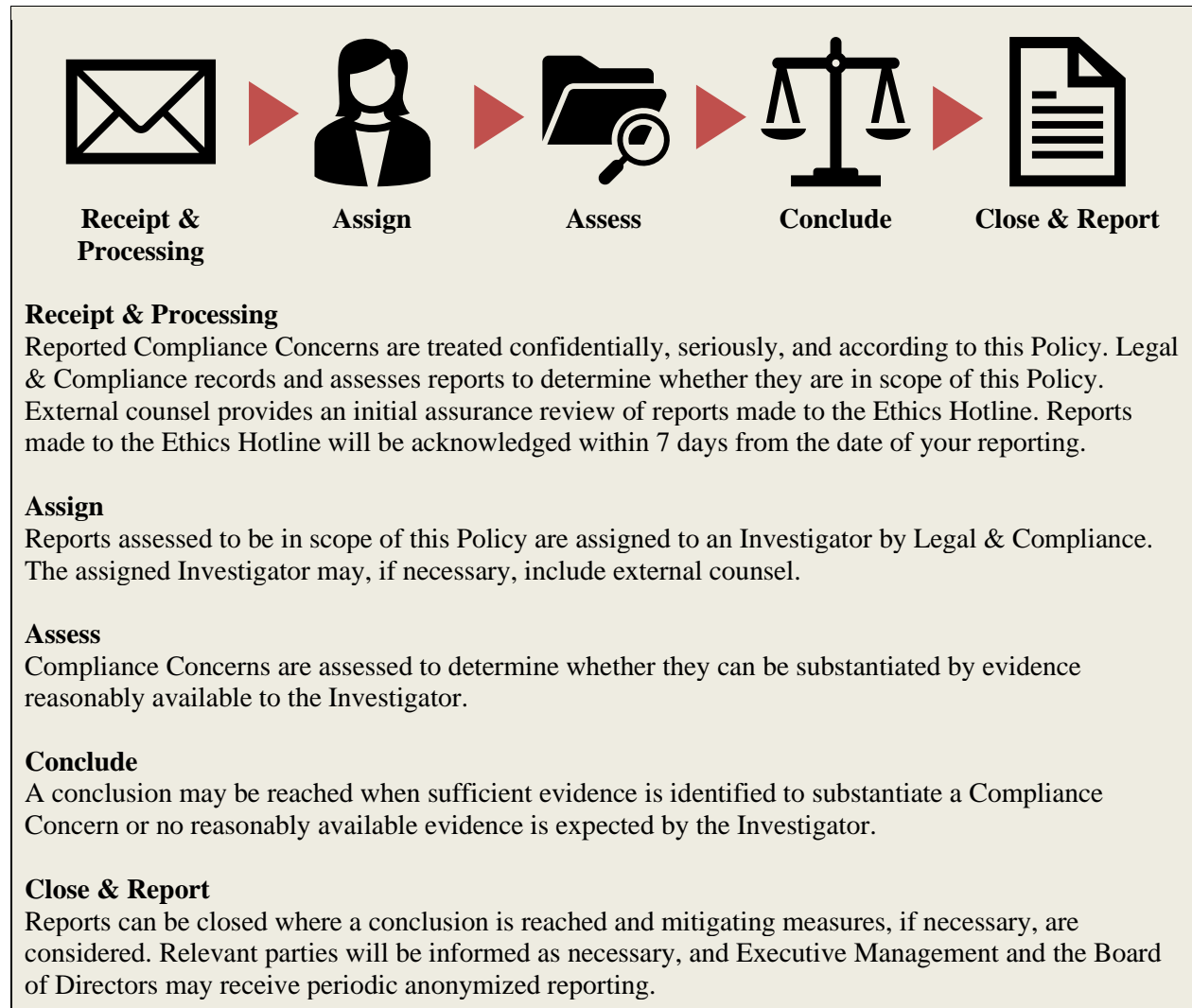
## 6. Confidentiality

Compliance Concerns are treated confidentially. Reporters may anonymously report Compliance Concerns through the Company's Ethics Hotline (subject to local law); although, providing your identity may assist in the investigation of the Compliance Concern.

## 7. What Information Should Be Included?

You are encouraged to include a thorough description of the Compliance Concern. At a minimum, this should include sufficient information to identify a particular suspected breach of the Company's Code of Conduct or applicable laws and regulations related to the Company, an approximate timeframe, place, involved persons, and any supporting documentation. The more relevant information provided, the more effective can we investigate and, if necessary, take corrective actions.

## 8. How Are Reports Handled?



## 9. Policy Against Retaliation

The Company does not tolerate retaliation against anyone who raises a Compliance Concern in good faith, cooperates or assists with an investigation, or refuses to do something that would violate the Code of Conduct or applicable law and regulations, even if the refusal results in loss of business to the Company. An employee or manager who engages in retaliation is subject to disciplinary action which could include termination of employment.

## 10. Personal Data Protection

Personal data will be retained as necessary to facilitate an investigation or as evidence subject to applicable law. Personal data collected through the Ethics Hotline will be processed in accordance with applicable data privacy law and the Company's Ethics Privacy Policy (<https://www.bavarian-nordic.com/privacy/ethics-hotline.aspx>).