

Standards for Responsible Business Conduct

Approved by Executive Management, October 2025



BAVARIAN NORDIC

CONTENTS

Scope of Application	3
About these Standards	3
Complying with these Standards	4
Breach and its consequences	4
Raising Concerns.....	5
Health and Safety	5
Labor Rights and Human Rights	6
Environmental Responsibility	8
Responsible Business Practices	10
Anti-Corruption and Bribery	11
Integrity & Protection of Data and Assets.....	12
Animal Welfare	12
Implementation of these Standards	13

SCOPE OF APPLICATION

These Standards apply to all external collaborations, such as (but not limited to); suppliers, vendors, contractors, contract manufacturing, contract research, manufacturing subcontractors, agents, consultants, distributors, transporters, and their respective affiliates, who have been commissioned to provide goods and/or services for Bavarian Nordic (hereafter referred to collectively as “suppliers”). We expect our suppliers to ensure that their suppliers adhere to similar ethical principles.

The requirements of these Standards may be in addition to the requirements set out in any agreement or other set of terms and conditions that apply to a supplier’s relationship with Bavarian Nordic. If any discrepancy or conflict arises between the terms of these Standards and national laws, suppliers are expected to follow whichever standard is more stringent.

ABOUT THESE STANDARDS

These Standards for Responsible Business Conduct (hereafter “Standards”) outline Bavarian Nordic’s commitments and expectations to our suppliers within ethics, human and labor rights, health and safety, and environmental performance. These Standards constitute an important step in the selection and evaluation of suppliers and external collaborations.

We believe that a commitment to honesty, integrity, and ethical conduct is essential to building trust with patients, health care professionals, customers, suppliers, collaboration partners, employees, shareholders, and communities in which we operate. These Standards define the principles, and provide a common ground, for doing business responsibly and with integrity in all forms of external collaborations.

These Standards are designed to help us achieve our mission, vision, and values and comply with the laws and regulations governing our business. We expect our suppliers and other external collaboration partners to cascade these Standards, or their equivalents, to their relevant suppliers and partners, to ensure a strong, transparent, and ethical supply chain.

These Standards are based on international principles, current and potential legislation, and industry practices, including the Pharmaceutical Supply Chain Initiative (PSCI). Bavarian Nordic is committed to the United Nations (UN) Guiding Principles on Business and Human Rights and the UN Global Compact, and we respect internationally recognized human rights, including the International Bill of Human Rights and International Labor Organization (ILO) Fundamental Conventions. We are also guided by the Organization for Economic Co-operation and Development’s (OECD) Guidelines for Multinational Enterprises on Responsible Business Conduct.

Our goal is to ensure that we incorporate these Standards into our daily business, to benefit employees, suppliers, partners, customers, health care professionals, and patients. We recognize that improving performance in some of these areas requires time and resources, and that implementation of these Standards must be done in the spirit of collaboration.

Thank you to all our external collaborations for your contribution to Bavarian Nordic and for joining us in securing a continued commitment to ethical, social, and environmental performance.

COMPLYING WITH THESE STANDARDS

By signing these Standards, or by signing a contract to which these Standards have been attached, you agree that these Standards form part of our contract.

You shall permit audits against these Standards under the same terms and conditions as other audits under your contract with Bavarian Nordic. Such an audit may be carried out on-site, and we, or our appointed auditors, may examine relevant documents, records, and facilities and may interview potentially affected individuals, such as employees, workers, and contractors. Without prejudice to any other rights or remedy Bavarian Nordic may have in this document and/or in any contract between Bavarian Nordic and you if non-conformities are identified during such an audit, you shall work together with us to identify and implement corrective actions and shall implement such actions within the agreed timeline.

We expect our suppliers to maintain appropriate governance and management systems to address key operational areas. This includes, but is not limited to, processes for due diligence, compliance monitoring, adoption of risk mitigation strategies, quality management, and business continuity management.

Suppliers must promptly address any identified non-compliance with these Standards or adverse impacts within their operations or value chain by implementing corrective actions to mitigate risks or prevent recurrence. Suppliers are expected to engage in proactive monitoring, regular reporting, and ongoing improvement initiatives.

BREACH AND ITS CONSEQUENCES

In addition to any other rights or remedy Bavarian Nordic may have in any contract(s) between you and Bavarian Nordic, to which these Standards apply, in the event of any breach by you of any of these Standards which Bavarian Nordic considers material, Bavarian Nordic shall have the right to terminate such contract(s) immediately on written notice.

If, as a supplier, you are not able to fully meet one or more of these Standards laid out in this document, we may in our sole discretion alternatively ask you to reach out and seek further guidance from your Bavarian Nordic contact and to discuss and agree on an improvement plan with corrective actions to ensure that you live up to these Standards.

If you cannot agree on, or do not deliver on an improvement plan, we reserve the right to terminate the contract.

RAISING CONCERNS

At Bavarian Nordic, we encourage an open and honest culture. Anyone who reasonably suspects breaches of these Standards should report this to our Ethics Hotline.

We expect our business partners to have internal reporting mechanisms for their employees and external stakeholders to raise concerns, as required by applicable law.

Bavarian Nordic's Commitment:

- Our Ethics Hotline is publicly available and enables confidential and anonymous reporting of suspected violations of our Code of Conduct and applicable laws and regulations.
- Claims reported to our Ethics Hotline are subject to an initial assurance review by outside counsel and Legal & Compliance. Compliance Concerns are treated confidentially. Reporters may anonymously report Compliance Concerns through our Ethics Hotline.
- Bavarian Nordic 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 our Code of Conduct or applicable law and regulations, even if the refusal results in loss of business.
- Reported Compliance Concerns are handled according to our Speak-Up

Policy available on our [Ethics Hotline page](#).

What We Expect from Our Suppliers:

- Have appropriate and proportionate grievance mechanism accessible to all relevant internal and external stakeholders and encourage them to report concerns.
- Notify Bavarian Nordic, within 30 working days, of any reported concerns that directly relate to any services carried out for, or on behalf of, Bavarian Nordic. This shall be done with respect to applicable privacy laws.
- Respect the principles of access to remedy as specified in the UN guiding Principles.

HEALTH AND SAFETY

Bavarian Nordic is committed to maintaining a safe and healthy workplace for all employees by actively preventing injuries and mitigating hazards, ensuring a secure work environment for everyone.

Bavarian Nordic's Commitment:

- We proactively work to ensure that we comply with all relevant health and safety requirements as defined by the authorities, in order to protect the welfare of our employees.
- We regularly review our health and safety principles to ensure we identify and address any emerging risks or implications, maintaining a foundation for our health and safety efforts.
- We are committed to providing health and well-being programs, addressing both physical and mental health needs.

What We Expect from Our Suppliers:

- Be familiar with, and conform to, Bavarian Nordic's health and safety Standards.
- Ensure compliance with all relevant regulations and requirements, as defined by the local authorities.
- Have appropriate work environment policies and procedures in place to protect workers from work-related hazards and potential dangers in the workplace, including protecting workers against exposure to chemical, biological, and physical hazards.
- Conduct appropriate training and education in health and safety.
- Provide adequate equipment, facilities, and services to support workers' safety, health, and well-being.
- Have appropriate controls in place to mitigate health and safety risks in the workplace, as well as risk assessments and emergency plans.
- Have appropriate grievance mechanisms that enable employees, stakeholders, and affected partners to raise concerns and provide remediation.

LABOR RIGHTS AND HUMAN RIGHTS

Bavarian Nordic's commitment extends to the labor and human rights of any persons who can be adversely affected by Bavarian Nordic's activities, including employees, patients, and people in our value chain.

Bavarian Nordic's Commitment:

- Respect human rights throughout our organization and supply chain, as defined by the United Nations Guiding Principles on Business and Human Rights (UNGPs), the International Bill of Human Rights, and the principles of the UN Global Compact.
- Ask that our suppliers have appropriate procedures in place regarding human rights, due diligence, and remedial actions.
- Identifying and addressing any adverse impact that may result from our own operations or business relationships.
- Opposing all forms of modern slavery, including child labor, forced labor, and human trafficking.
- Providing equal opportunities and fair treatment to all individuals, as well as good conditions for employment regarding performance management, fair pay, rewards, data privacy training, and people development.
- Zero tolerance towards discrimination based on characteristics such as gender or gender presentation, nationality, age, educational background, ethnicity, disability, race, religion, sexual orientation, military veteran status, or other characteristics protected by law or otherwise ethically deserving of protection.
- Zero tolerance of harassment, including any form of unwarranted sexual attention, bullying, or retaliation.
- Respecting employees' rights to freedom of association and collective bargaining.

What We Expect from Our Suppliers:

- Be familiar with, and conform to, Bavarian Nordic's [Human Rights Policy](#).
- Respect human rights, which includes labor rights, and treat people with dignity and respect, including internationally recognized human rights.
- Actively consider and prioritize the needs of vulnerable groups, ensuring that practices promote inclusivity, fairness, and respect for all individuals.
- Remunerate employees and workers in compliance with all applicable laws and regulations, e.g., minimum wages, overtime wages, sick leave, mandatory benefits, or other applicable regulations.

Child labor and young workers

- Not to use any form of child labor or young workers, as defined by the applicable laws in the country of production.
- Protect young workers below the age of 18, and above the legal working age, from any type of employment or work which can hinder their education or schooling needs, e.g., chemicals, hard physical work, and night shifts.

Forced or compulsory labor

- Not to use any form of forced or compulsory labor, whether directly or indirectly. Employees shall be free to leave their employer after reasonable notice, and employees shall be paid on time and in full for the work they have done prior to leaving. Suppliers shall not require workers to hand over their identity papers to secure employment (unless required by law).

Human trafficking

- Ensure that their operations and supply chain are free of all forms of human trafficking.

Freedom of association & right to collective bargaining

- To the extent provided for in local laws, suppliers must respect the rights of their employees to associate, form and join (or not join) labor unions, seek representation, join workers councils, and engage in collective bargaining.
- Commit to an open and constructive dialogue with their employees and workers, and their representatives, and employees who act as workers' representatives must be able to exercise their role without fear of repercussion or discrimination.

Fair treatment & equal opportunities

- Provide employees with a workplace free of discrimination based on characteristics such as gender, nationality, age, educational background, ethnicity, physical impairment, race, religion, sexual orientation, or other characteristics protected by law or otherwise deserving of protection.

Harassment and abusive behavior

- Treat employees and other workers with dignity and respect and to take all reasonable measures to avoid any form of harassment, including any form of unwarranted sexual attention, abusive behavior, bullying, or retaliation.

Harassment and abusive behavior

- Provide all employees with an employment contract or letter (when required by local law) that outlines all their main conditions of employment.

Working time & time off

- Commit to providing reasonable working hours to their employees and workers that respect the limits set by applicable laws, regulations, industry principles, and collective agreements. Suppliers shall at minimum respect internationally recognized principles of 48 regular hours of work per week and at least 24 hours (consecutive hours) of rest in every 7-day period.
- Employees and workers shall be entitled to take paid vacation in accordance with applicable law.

Conflict-affected areas

- To the extent suppliers operate in or source from conflict-affected areas, we expect them to ensure that they and their sub-suppliers do not provide funding to or otherwise support organizations and/or countries' subjects.

Conflict Minerals

- A supplier is requested to inform Bavarian Nordic, and meet applicable regulations, if designated "Conflict Minerals" (tin, tantalum, tungsten, or gold and/or their derivatives) are necessary to the functionality or production of a product manufactured and sold to Bavarian Nordic.

ENVIRONMENTAL RESPONSIBILITY

We recognize the importance of protecting and taking care of the world around us. We are committed to working actively and systematically to minimize our impact on the world and climate, together with our suppliers.

Bavarian Nordic's Commitment:

- We work to minimize our negative impact on the environment and climate by acting jointly and responsibly.
- Our efforts include, but are not limited to improving energy efficiency and reducing emissions and waste, increasing the waste recycling rate, storing hazardous and combustible materials safely and legally, preventing pollution, spills, and releases, and mitigating our footprint on biodiversity.
- We actively communicate our environmental achievements and challenges, fostering dialogue and collaboration with our employees and stakeholders to drive continuous improvement.
- We work to maintain a high degree of compliance and systematize environmental principles in our organization.

What We Expect from Our Suppliers:

- Meet or exceed applicable environmental laws and obtain all required environmental permits, licenses, and registrations while adhering to all related operational and reporting requirements.

- Strive to reduce the environmental impact of products or services throughout their life cycle by taking precautionary approaches.
- Have adequate management systems in place to monitor, measure, and improve the environmental impact of their operations, ensuring the collection of relevant data and metrics.
- Raise awareness and ensure a proactive approach to environmental work and promptly report any known or suspected violations of environmental laws and regulations.

Climate Change

- Monitoring and taking proactive measures to reduce their GHG emissions from operations, as well as encouraging and supporting suppliers to do the same.

Energy Consumption

- Strive to use energy efficiently, reduce consumption, and transition to renewable energy sources where feasible.
- Implement energy-saving practices, track energy use, and comply with all relevant local and international energy regulations.

Pollution, Spills, and Waste

- All waste, wastewater, and emissions with the potential to harm human or environmental health must be effectively managed, controlled, and treated.
- Implement systems to prevent and mitigate accidental spills and releases to the environment and adverse impacts on the local community.

Biodiversity

- Take appropriate measures to protect biodiversity and minimize adverse impacts where possible.
- Avoid producing and sourcing from areas of high conservation value and high-water stress, prevent deforestation, and implement practices that support habitat preservation and sustainable land use where possible.

Hazardous Materials

- Informing on the use of hazardous materials to ensure safe handling of these during production, transportation, potential recycling, and disposal.
- Have appropriate control mechanisms to mitigate emissions and pollution from hazardous materials and waste.

Water Consumption

- Actively monitor and manage water withdrawals, particularly in areas of high-water stress to minimize impact and promote efficient water use.
- Implement measures that limit pollutants in discharge water and prevent contamination.

Resource Use

- Minimize the use of resources and materials and find environmentally friendly substitutions.
- Promote circularity principles where possible by reducing waste, improving resource efficiency, and implementing strategies for reuse and recycling.

RESPONSIBLE BUSINESS PRACTICES

We make business decisions based on what is best for Bavarian Nordic, and we expect our suppliers to comply with the requirements as set out in the contracts and policies that apply to them whenever they do business.

Bavarian Nordic's Commitment:

Conflicts of Interest

- We make decisions based on what is best for Bavarian Nordic and our patients, and not for any personal gain or benefit. Our decisions are based solely on objective criteria and professional judgment and never improperly influenced by personal interest or relationships.
- A conflict of interest occurs when a personal interest or relationship can influence the judgment and ability to perform one's job in an objective way because that interest or relationship conflicts with the Company's interests. Even the appearance or perception of a conflict of interest may put the Company's reputation at risk.
- Employees are required proactively and promptly to disclose an actual or potential conflict of interest to an unconflicted manager. It is not always clear what may constitute a conflict of interest. Employees are, therefore, expected to discuss any potential conflict of interest - or questions about how best to handle a situation where a conflict of interest might exist - with an unconflicted manager or Legal & Compliance. Material conflicts of interest which cannot be resolved must be reported to Legal & Compliance.
- Board members are required proactively and promptly to report actual or potential conflicts of interest to the Chairman of the Board to ensure a personal interest or relationship of the Board member does not interfere with the exercise of the member's responsibility to act in the interest of Bavarian Nordic.

Fair Competition

- In many countries, regional or local competition/antitrust laws are designed to protect consumers and competitors against unfair business practices and to promote and preserve free and fair competition in the marketplace. We conduct all our business dealings with respect for free and fair markets and in full compliance with all applicable antitrust and competition laws.
- This includes that whenever we set and negotiate prices, arrange for distribution of products, tender for private and public purchasing, target customers and markets, and collect market intelligence, we do this independently of competitors and in full compliance with applicable competition laws.
- It also includes that we do *not* engage in prohibited anticompetitive behavior, such as coordinating with competitors to fix prices or make arrangements to share markets, and that we do *not* misuse a competitor's confidential information or make false statements about a competitor's business and business practices. Instead, we focus on the merits of our own company and our own products.

What We Expect from Our Suppliers:

- At Bavarian Nordic, we have high ethical standards, and we expect third parties who act on our behalf or in our interest to have similarly high ethical standards and to conduct business ethically and in compliance with all applicable laws and regulations.

- For third parties who represent Bavarian Nordic in critical business matters, we have processes in place - before engaging the third party and while working with them - to evaluate the third party's integrity and to assess the level of alignment with our ethical principles and standard.

ANTI-CORRUPTION AND BRIBERY

At Bavarian Nordic, we are committed to conducting business ethically and responsibly.

Bavarian Nordic's Commitment:

Bribery and inappropriate advantages

- At Bavarian Nordic, we compete fairly, and we do not accept bribery, corruption, or fraud in any form whether conducted by an employee or by a third party on our behalf.
- We do not offer, promise, provide, authorize, or accept anything of value that could inappropriately influence a decision or gain an unfair advantage.
- Bribes and inappropriate advantages can be in the form of cash payments or illegal rebates, but they can also be in the form of inappropriate gifts, favors, meals, travel, accommodation, and entertainment.

Facilitation payments

- At Bavarian Nordic, we refuse to pay facilitation payments. A facilitation payment is an illegal or unofficial payment/transfer of value made to a government official to obtain or speed up the delivery of a routine task or action which the payer is entitled to receive without making such payment.

Fraud

- At Bavarian Nordic, we are committed to prevent and detect fraud. All employees and managers are expected to refrain from engaging in any kind of fraud against the Company, any of our business partners or any governmental entity.
- Fraud generally means deliberately deceiving a person or a company to obtain an unjustified benefit (such as funds, property or services), to cause a loss to another party or to illegally move funds. Fraud can take the form of theft of funds, inventory, or property of the Company, including making false expense reports, or it can take the form of manipulating financial statements or accounting information or forgery of documents (such as accounts, contracts, or clinical or safety data).

What We Expect from Our Suppliers:

- We expect third parties who act on our behalf or in our interest to conduct business ethically and in compliance with all applicable laws and regulations.
- For third parties who represent Bavarian Nordic in critical business matters, you will be subject to additional processes to ensure integrity and to assess the level of alignment with our ethical principles and standards.

INTEGRITY & PROTECTION OF DATA AND ASSETS

We believe our suppliers to be key agents in securing and safeguarding against digital threats and data ethics, and to protect the fundamental right to the protection of personal data.

Bavarian Nordic's Commitment:

- We protect our confidential information, our trade secrets, and the Company's intellectual property, e.g., patents and trademarks, and we respect the confidential information, personal data, trade secrets, and intellectual property rights of other companies and individuals.
- In the course of conducting our business, we collect, use, process, and store personal data from or about employees, patients, healthcare professionals, customers, consultants, and other individuals. We are committed to handling, processing, and storing all personal data in an ethical and safe manner and in compliance with all applicable data privacy legislation.
- When we collect, use, process, and store personal data, we only do it for a legitimate business purpose and, as required by applicable local laws and regulations, we inform people how we use their personal data, we only share personal data with those who have a need to know, we store personal data securely, and we delete personal data when no longer needed.
- We have procedures and systems in place to handle data breaches and requests from individuals to receive, change, or delete their personal data, to ensure we have the necessary agreements in place with third parties that process personal data on our behalf, and to otherwise ensure compliance with all applicable data privacy legislation.

What We Expect from Our Suppliers:

- Act with due care to protect Bavarian Nordic's information and data.
- Always act truthfully in their management of information and intellectual property and provide complete and accurate information to Bavarian Nordic.
- Maintain and enforce appropriate safety and physical security procedures with respect to the access and maintenance of Bavarian Nordic's intellectual property or confidential or personal information.
- Protect the data privacy of employees and suppliers when collecting and processing personal data, including information regarding Bavarian Nordic's employees.
- Adhere to all applicable data privacy laws when collecting, storing, using, processing, and sharing personal data.

ANIMAL WELFARE

We see the ethical and human treatment of animals required for scientific investigation as our responsibility, and expect our suppliers to uphold the same ethical standards.

Bavarian Nordic's Commitment:

- We see the ethical and humane treatment of animals required for scientific investigation as our responsibility. We value the 3R-principle (Reduce, Replace & Refine animal testing) and all applicable regulations with internal and external evaluation restricting in vivo testing to the absolute minimum needed to ensure safe and efficacious treatments.
- When conducting our pre-clinical trials, we care for the welfare of animals, and all our animal handling staff are thoroughly trained in best practices and is regularly evaluated to make sure they possess the right competences and understanding of the well-being of animals in our care.
- When we choose external contractors, such as contract research organizations and laboratories, we take great care to ensure that such external contractors take care for the welfare of the animals in the same way as we do, and we regularly evaluate and control, during audits at their sites, our external contractors' compliance with all relevant standards and with our high ethical standards.

What We Expect from Our Suppliers:

- Uphold the same ethical standards and demonstrate a commitment to reducing animal testing. Animal welfare must be prioritized, with trained personnel adhering to best practices and subject to regular evaluations to ensure their competence and understanding of animal care.
- Evaluate and monitor contractors to ensure compliance with all relevant animal welfare regulations and uphold ethical standards during audits and site visit.

IMPLEMENTATION OF THESE STANDARDS

The oversight of these Standards is the responsibility of Bavarian Nordic's Executive Management.

The Corporate Sustainability department is responsible for maintaining and updating these Standards as required by changes to market practice, regulation, voluntary standards, or as otherwise deemed necessary.

Employees at Bavarian Nordic with responsibility for supplier collaboration are responsible for ensuring that these standards are incorporated in daily operations and for interactions with relevant external parties.

VERSION

Edition	Date	Amendment
1	October 2025	Original