

# Code of Conduct

We, the *RNA people*: Our Code, our Values, our Culture

September 2024



**Dear colleagues,**

CureVac was founded in 2000 as a **pioneer in mRNA research**. Where others saw obstacles in developing and producing therapies using mRNA technology, we discovered opportunities.

This history, our passion for revolutionary research and scientific excellence, our unwavering optimism and focus on constructive, creative solutions continue to shape us today. **It is my mission and the mission of CureVac to honor the promise of mRNA and to develop the next generation of transformative medicines for patients.**

We work as **one team** and **people are at the center** of everything we do. All *RNA people* individually play their part to deliver tangible results for our mission and to hold others accountable to do the same. My goal is to create a company that enables all *RNA people* to contribute and excel to the best of their abilities.

In our pursuit of innovation and success, we never forget our values. As *RNA people*, we strive to promote **sustainability and the highest standards of ethical behavior and integrity**. Only then are we able to cooperate honestly and fairly as *RNA people* and with our business partners as well as live up to the trust that our patients and our shareholders place in us.

In doing so, this Code of Conduct is intended to serve as a **compass and guideline** for all *RNA people* - from supervisory and management board members to interns. Our Compliance Officer and the Legal & Compliance Department are available as a point of contact for questions and concerns.

As a biopharmaceutical company, we bear a **special responsibility and are a beacon of hope** for many people - we want to live up to this aspiration at all times through our actions and conduct.



# Table of contents

---

## **We are the *RNA people*** 4

---

## **Our Code, our Values, our Culture** 5

---

Scope of our Code of Conduct 6

Our mission, our key behaviors, our Compliance culture 7

How to make the right decision 8

How we treat others 9

Sustainability, environment and human rights 11

We speak up 12

---

## **We are Accountable** 14

---

We avoid conflicts of interest 15

We comply with all regulatory and quality requirements 16

We interact ethically with healthcare professionals and patients 17

---

---

## **We Follow the Letter and Spirit of the Law** 19

---

Our responsibility 20

We fight bribery and corruption 22

We protect personal data and adhere to data privacy laws 24

We compete fairly 26

We comply with trade laws 28

We fight money laundering 29

We prevent fraud, cybercrime and terrorist financing 30

---

## **We Protect CureVac** 31

---

How to use and protect our company assets 32

We do not engage in insider trading 33

Accurate records and information 35

We are eager to learn 37

---

## **Glossary** 38

---

# We are the *RNA people*

To achieve the mission of CureVac, it's all about people



## CureVac – one culture, one team

We work in different entities, but share the same mission

### We strive to deliver on the promise of mRNA to develop the next generation of transformative medicines for patients

We are pioneers and passionate about mRNA. We do not comfort ourselves with the status quo of medical knowledge and research but think further – way further. Our strong work ethics and **spirit of collaboration** and **experimentation** are embedded in our corporate DNA.

CureVac recognized the **promise of mRNA** and started successfully exploring its potential for medical purposes. Being innovative, thinking outside the box and moving forward in an interdisciplinary, agile and collaborative way are the pillars of our company and our success. We, as the RNA community, are open-minded and committed to developing **transformative medicines for patients**. We **focus** on achieving these shared goals and will deliver what we promise. To limit ourselves would mean to limit the potential of mRNA for the benefit of human health.

This is **our mission**, this is our motivation, **this is us – the RNA people**.

To achieve these goals of CureVac, we believe it's all about people. We work in different entities, but we all share the same **mission**, goals and passion. CureVac is our company, we have **one culture** and we work together as **one team** to develop and deliver the highest quality mRNA products possible. As such, this Code of Conduct applies to all of our entities, employees and other personnel.



**Our Code, our Values, our Culture**



## MISSION

Deliver on the promise of mRNA to develop next generation of transformative medicines for patients

# CARE

### How can the Code of Conduct help us?

The Code of Conduct is our road map that helps us stay aligned with our mission and ensures that we never lose track of our values and key behaviors. The Code of Conduct explains some of the legal rules we all must abide by and take personal responsibility for. While our Code of Conduct does not cover all situations we may face in our daily work routine, it is intended to serve as a first guide when we encounter an unclear or difficult situation.

In particular, the Code of Conduct enables us to:

- Behave honestly and ethically
- Uphold our values and deepen the trust that is placed in us and our work
- Make informed decisions which are in line with our mission
- Understand what is expected from us and, if necessary, where to go for guidance
- Understand and follow the policies and codes of our company
- Understand and adhere to laws, regulations and other standards that apply to our company

We all – regardless of our position, whether in management, as a scientist or as an intern – must adhere to our corporate values and abide by the rules of this Code of Conduct.

CureVac takes potential violations of this Code of Conduct very seriously. Code of Conduct violations may result in disciplinary action, up to and including the termination of employment.

# Our mission, our key behaviors, our Compliance culture (2/2)

Our Code of Conduct is built upon our mission and key behaviors and serves as our compass. Our company culture and our interaction with colleagues, investors, customers and business partners are based on our daily commitment to live up to this mission and values.



We believe that people are the origin, purpose and success of our company. Without our dedicated, unique, skilled, imaginative and diverse *RNA people*, we would not be able to achieve **our mission**. We believe in **respectful** interactions and a supportive corporate environment that promotes contributions by all *RNA people*. We will build on our strength of teamwork to unleash the power of seamless **collaboration** across our organization. This will be underpinned by clear and consistent communication. Our success depends on us working together as **one team**.



We believe that **accountability** is the key to success for **our mission**. We will deliver what we promise and hold others accountable to do the same. Making decisions, abiding by them, and doing what we promise. We are also committed to the highest standards of **ethics, integrity and sustainability**. We invest in long-standing relationships with colleagues, investors, customers and business partners, prioritize long-term value and are recognized as a trusted partner.



We believe that we need to **focus** on achieving our shared strategic goals and individual operational priorities. We understand how we as *RNA people* individually play a part and take action to deliver tangible **results** for **our mission** and the **patients** worldwide with unmet medical needs.



We believe that **innovation** and **scientific excellence** can only be reached through **experimentation**. Across all areas of our business, we as *RNA people* are courageous and willing to embrace new thinking and different decisions. We will foster a culture of continuous improvement and move at pace to stay ahead of the curve to achieve **our mission**.

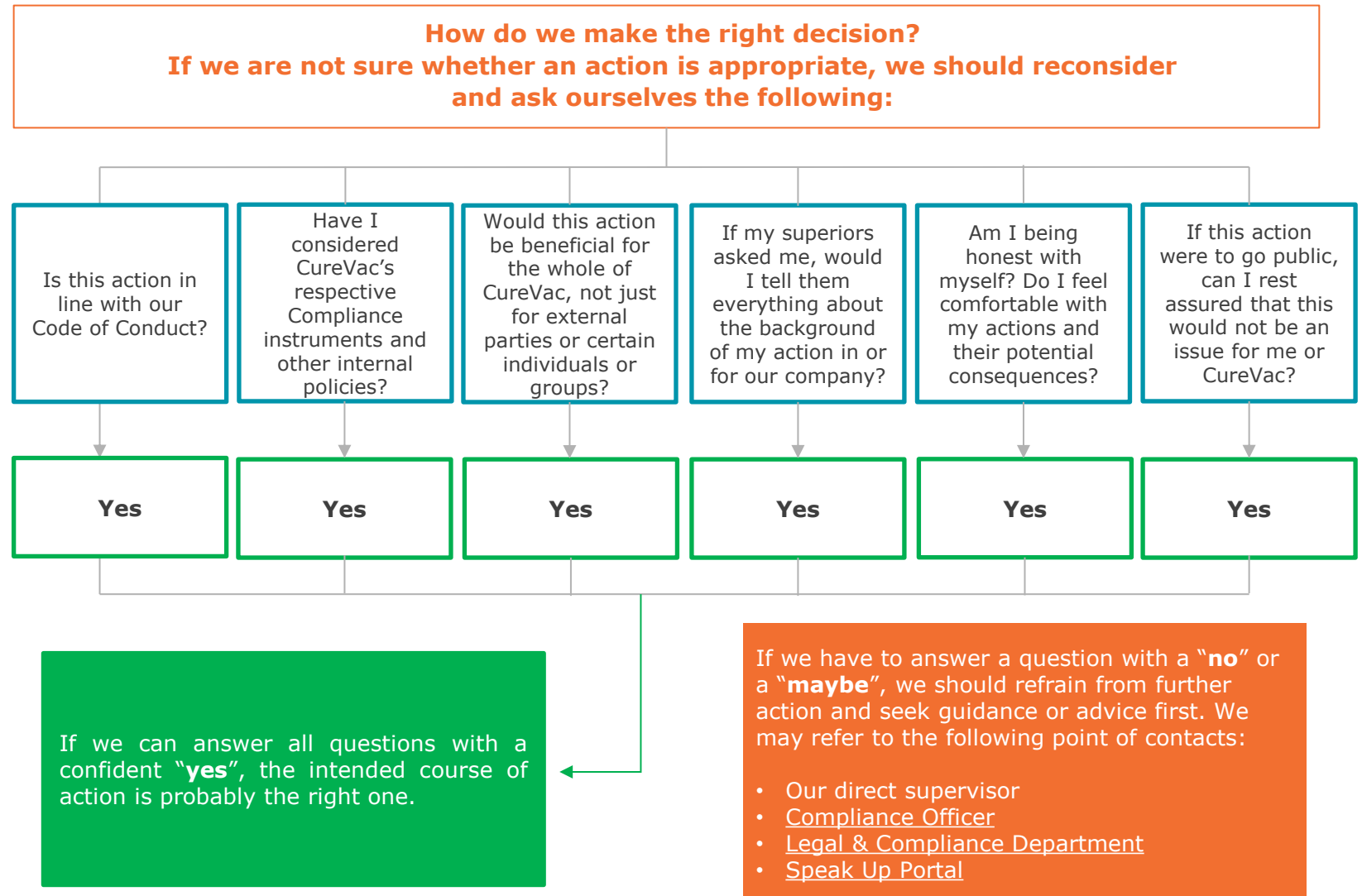
# CARE

# How to make the right decision

## What is expected from us?

### As the RNA people, we are expected to:

- **Know our Code of Conduct.** We must comply with all applicable laws, regulations, Compliance instruments and other internal policies, and act in accordance with our values and key behaviors at all times. We, therefore, need to read and understand the Code of Conduct.
- **Ask for help.** If we are not sure how to act in a particular situation or have questions that our Code of Conduct may not answer directly, we ask for guidance and help.
- **Act trustworthy and follow good judgment.** Regardless of our specific position, we must all act honestly and ethically in everything we do.
- **Treat others with respect.** We need to respect and embrace different opinions and maintain respectful behavior, both internally and when dealing with business partners or other organizations.
- **Stay alert and report concerns when necessary.** If we become aware of a situation that violates our Code of Conduct or our policies or is against the law, we are courageous and speak up. We should never intentionally disregard a potential violation that could harm our company.
- **Be one team and act as a team.** We – the RNA people – are expected to work closely together, communicate with each other, share ideas, discuss issues and help each other.





# How we treat others (1/2)

## Our workplace environment

Without a healthy and trustworthy workplace environment, we would not be able to perform our innovative excellent research and develop the most effective products. Therefore, we need to create an atmosphere of trust, inclusion and respect for ourselves and our dear colleagues.

We value diversity, different opinions and care for each other, no matter the age, gender, sexual orientation, ethnic background and religious belief.

## Our credo

We are one team and work together side by side with mutual respect **and dignity**.

- **We won't tolerate harassment, discrimination and bullying!**
- **We prohibit conduct that creates an intimidating or hostile working environment!**

## What is harassment?

Harassment is conduct that creates a disrespectful, hostile, humiliating, disrespectful or offensive environment. Harassment is about impact – how others may be offended by an action – not the intent behind it.

**Harassment is never tolerated at CureVac!**

## Collaborative spirit and equity

We might work in different entities, but we share the same mission, aims and passion.

## How to live up to our values and promote a thriving working environment for everybody:

- We promote fairness and equity.
- We treat each other with respect and dignity.
- We welcome ideas and opinions from other people.
- We are supportive and offer help whenever needed.

**Whenever we become aware of any behavior that is contrary to our values and principles, we speak up!**



# How we treat others (2/2)

## How we treat our suppliers and business partners matters

We depend on our suppliers and business partners, and our suppliers and business partners depend on us as well. We place trust in each other and value our business relationships. That means we work together honestly, fairly and with respect. The principles of our cooperation are set out in our Supplier Code of Conduct.

### How to maintain a successful business relationship with our partners:

- We (always) communicate in a professional manner.
- Our interactions are conducted with integrity.
- We only share accurate information – we never give misleading or false statements.
- We comply with all applicable medical, legal and regulatory standards, and request our business partners to do the same.

## Our shareholders expect excellence

Our shareholders trust us through their investment. In return, we engage with our investors in a transparent and courteous way.

### How to sustain a trustworthy relationship with our investors:

- We provide good corporate governance and live up to our values and standards.
- We provide honest and accurate information with regard to our material operational activities and milestones as well as our financials.

## Q&A



### Question

I overheard my coworker on the phone with one of our current strategic partners. He provided inaccurate information to them about the results of a preclinical development phase.

### How should I react?

### Answer

Sharing inaccurate information is a violation of our Code of Conduct. We should reach out to our colleague to better understand why such misleading or false information was shared and how to best correct them. If we are unsure whether a correction is necessary or how best to approach the situation, we can request guidance from our direct supervisor or the Legal & Compliance Department. The Legal & Compliance Department will help me evaluate the situation and (if necessary) determine next steps.

In case, we get the impression that any misleading or false information has been shared in the past, we must immediately report the incident to our Legal & Compliance Department.

We – the *RNA people* – strive for sustainability and are committed to ethical business. We seek to obey and promote sustainability, environmental protection, animal welfare, and respect for human rights. In line with our corporate philosophy and values, we strive to reduce our carbon footprint, because, as *RNA people*, we have a mission to serve humanity through our healthcare products. As such, we will seek to align our actions and policies with the United Nations Guiding Principles on Business and Human Rights, the OECD Due Diligence Guidance for Responsible Business Conduct and the applicable supply chain legislation.

Therefore, we recognize the importance of environmental, social and governance (**ESG**) concerns as a key element of our production and business model, and ESG compliance is considered in the selection and development of business relationships with our suppliers.

Human rights or environmental violations in our company or supply chains would also damage our company's reputation in the public eye and may result in severe penalties and exclusion from public contracts under the applicable supply chain legislation.

As a company that values sustainability, it is important to us that we comply with the respective local standards in the area of human rights and environmental standards in our global supply chains, if these local standards are at least equivalent to the minimum international standards. These principles are reflected in our Human Rights Policy Statement and Supplier Code of Conduct.

Human rights and environmental standards under the applicable supply chain legislation include standards such as, for example, the prohibition of forced labor and child labor, occupational health and safety, appropriate working hours, decent wages, equal treatment, diversity and inclusion, freedom of association, life, health and healthy living, illegal deprivation of land or water, and local environmental standards that must be complied with in the production country.

## **We respect human rights and environmental standards**

- We embrace human rights and environmental standards when researching our RNA products, manufacturing our products and in all our other actions, policies and business relationships.
- We comply with local working conditions, animal welfare and environmental standards at CureVac and throughout our supply chains, and we support our suppliers in ensuring safe and healthy workplaces and protecting our environment.

## **How can we help to comply with human rights and environmental standards?**

If we become aware of any suspected violation of human rights, animal welfare or environmental standards at CureVac or in our supply chain, we report these violations and speak up!

# We speak up (1/2)

## We ask for help

Sometimes, we can avoid critical or unpleasant situations by seeking advice when we are uncertain about correct behavior. Therefore, we ask for guidance whenever we are not sure how to act ethically and with integrity in certain situations.

## We report concerns

Speaking up and reporting a concern takes a lot of courage. It is not easy, in particular, if we have just seen or have (over)heard something that triggers a disturbing feeling in us without having any hard evidence to prove it.

Nevertheless, reporting concerns can help us when we feel uncomfortable in a situation or regarding a specific action. It can support us and our colleagues to better understand what behavior is expected.

Our sense of right and wrong is also essential for our company. Any concern that is reported in good faith may allow our company to react adequately by either remediating misconduct that has already happened or – in a best-case scenario – even detecting potential misconduct before it takes place.

Therefore, we should always raise our voice, whenever we sense any potential violation of our Code of Conduct, our policies or the law. It is our responsibility to live up to our values, to contribute to fair and trustworthy business conduct, and to retain a prosperous working atmosphere.

That is why we speak up whenever any of our values appear to be endangered.



## Where can we go to?

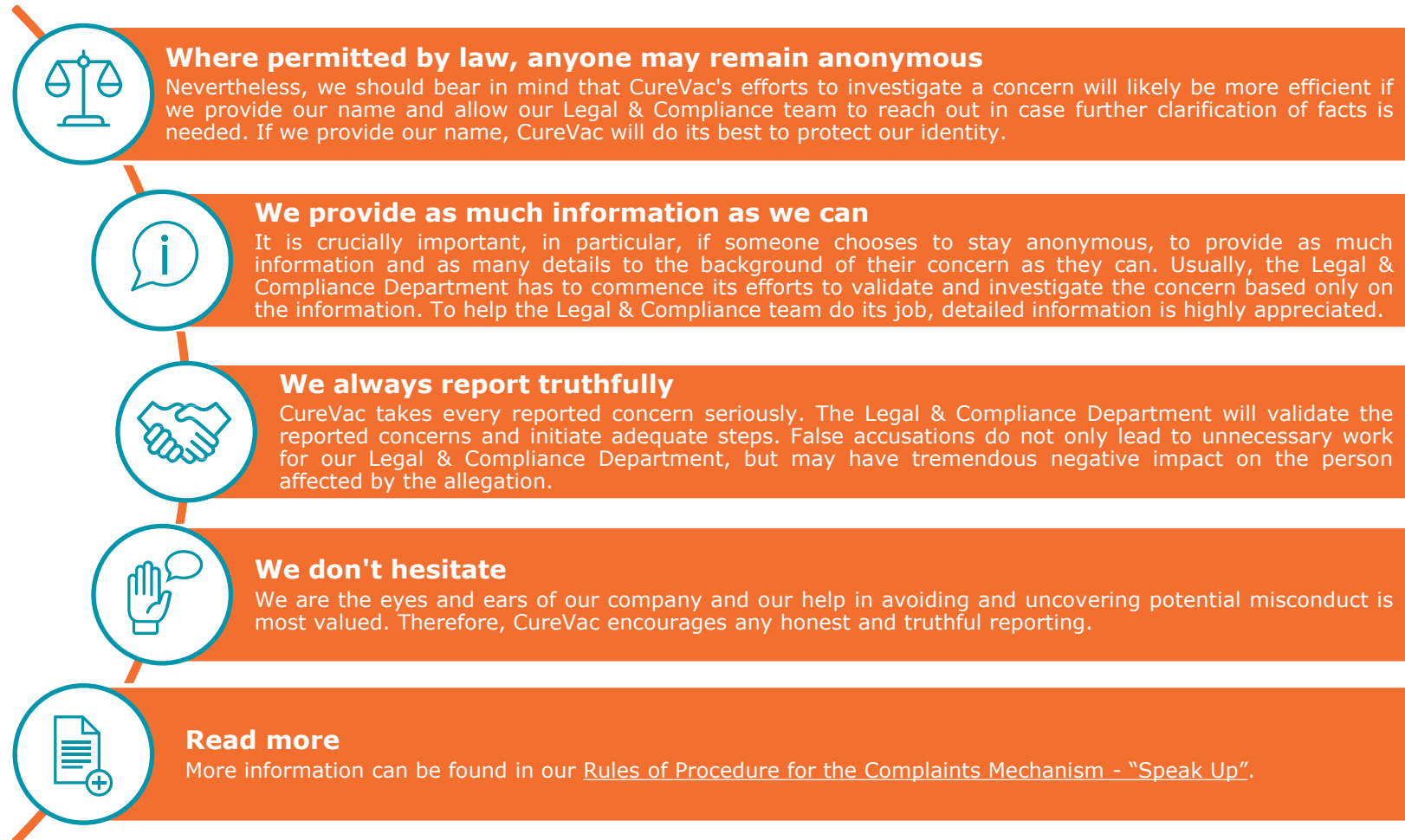
**At CureVac, we have several points of contact we can turn to. We can:**

1. Speak to our direct supervisor.
2. Talk to our [Compliance Officer](#).
3. Report confidentially via the reporting tool ([Speak Up Portal](#)) available on the intranet page of the [Legal & Compliance Department](#).

For more information we may refer to our [Rules of Procedure for the Complaints Mechanism](#) - [“Speak Up”](#).



## How to speak up?



## No retaliation

A person's reporting in good faith is essential to ensure high standards of ethics and integrity, and therefore, helps us to maintain trust in our partners, employees and our company. Therefore, CureVac strictly prohibits retaliation of any kind against anyone who reports a concern in good faith. Even if the allegations cannot be verified, the reporting person enjoys CureVac's full protection.

## Did you know?

In order to encourage us to speak up, CureVac defines the term retaliation in a very broad sense. At CureVac, retaliation is understood as any action that might prevent an employee from reporting a concern. CureVac's understanding of retaliation is, therefore, not limited to demotion, firing, reduction of salary, threats or other forms of harassment, but also covers unpleasant job reassignments or performance reviews.

A male scientist with a beard and safety glasses, wearing a white lab coat and green gloves, is focused on using a pipette in a laboratory. The background is slightly blurred, showing lab equipment and shelves. A semi-transparent white box with a blue border is overlaid on the image, containing the text 'We are accountable'.

**We are accountable**

# We avoid conflicts of interest

## We avoid conflicts of interest

We are expected to act in the best interest of our company. This means that the decisions we make on the job must be objective and without the hint of an appearance that a personal interest influences our decision.

This is not always easy as all of us have personal interests, which is part of our motivation and what makes us unique. To set personal interests aside whenever we come to work and act for CureVac may therefore be challenging. In practice, the boundaries of personal and company interests are easily blurred. For more information, we refer to our [Standard for Conflicts of Interest](#).

## What can I do to avoid a conflict of interest?

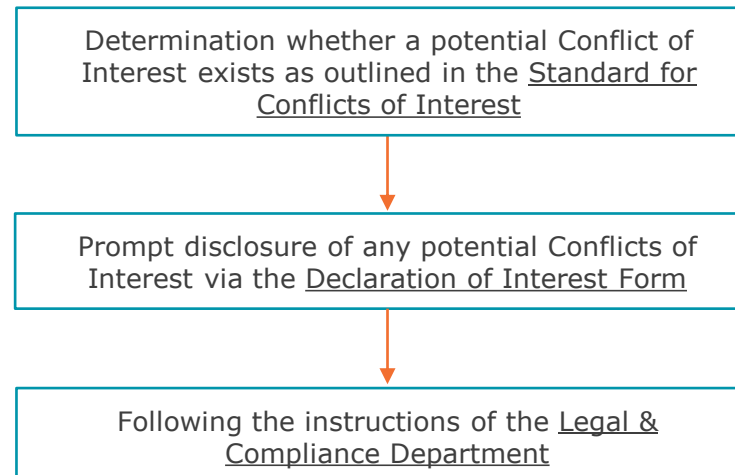
The most challenging part is recognizing a potential conflict of interest in the first place. Often, conflicts of interest are not obvious, but hide in everyday situations, and may harm our company and cause reputational damage. To be able to act accordingly, it is very important for us to know the types of situations that often lead to a conflict of interest:

**Financial interests** – We should be aware if our investments involve suppliers, customers, competitors or other business partners of our company. In case we are in a position to negotiate or determine the terms of our business relationships with such organizations for CureVac, we might not be allowed to have any financial interest in those organizations without prior approval from the responsible function.

**Secondary employment** – We should be particularly careful if we are offered a role as director, advisory member or board member for another organization, as such roles likely interfere with our ability to objectively do our job for CureVac. It is, for this reason, prohibited to accept such a position without CureVac's consent.

**Working with or hiring of family members** – If we have a role in the company that decides on personnel matters, we should refrain from dealing with issues that involve family members or close friends, as such involvement likely creates the appearance of a preferential treatment due to a personal interest.

### CureVac's three-step process to handle potential Conflicts of Interest:



## Q&A



### Question

I work in the Procurement Department and I am responsible for purchasing materials, products and components for our RNA products. My job requires close cooperation with our suppliers to ensure that they deliver the highest quality. Last week, I had lunch with the CEO of one of our suppliers, and the CEO offered me a position on their company's board of directors.

### Could this be a conflict of interest?

### Answer

Yes, this would be a conflict of interest, as the role of director, board or advisory member for another organization may interfere with our obligations to our company. This is because, for example, a position on the supervisory board of one of our contractual partners – e.g., at a supplier – means that we are no longer completely independent when concluding contracts. Therefore, we should generally avoid sitting on the board of a supplier or customer, particularly when we deal with them on a regular basis in our professional capacity. In any case, we must disclose the intended service/activity and ask for approval from the responsible function.

# We comply with all regulatory and quality requirements

We – the *RNA people* – are dedicated to scientific excellence and finding and implementing solutions which improve the health and well-being of people worldwide.

For this purpose, and to earn and maintain trust in our RNA products and technology, we ensure that all our activities in research and development, manufacturing and supply comply with all applicable legal, regulatory and quality requirements and our internal policies and standards.

## Research and Development

It is part of our DNA that all our research and development activities live up to our dedication for scientific excellence. We are, therefore, committed to conducting all our research and all our pre-clinical and clinical development following the highest medical, ethical and scientific standards, and in full compliance with all applicable laws, regulations and good practice guidelines, including good laboratory practices (**GLP**) and good clinical practices (**GCP**), and animal welfare standards.

## Manufacturing and Quality

The quality of products is the key to achieving our goal of improving the health and well-being of people and patients and to ensuring the safety of clinical trial participants.

Therefore, we strive to comply with the highest quality standards and ensure that we conduct our own manufacturing operations in full compliance with all applicable laws, regulations and good manufacturing practices and standards. We apply rigorous controls so that our partners who manufacture or supply products for us live up to the same standards to which we hold ourselves accountable.

## Data Integrity

The integrity and quality of the clinical data from our sponsored studies is essential to ensure that our regulatory submissions are founded on data of the highest quality.

To achieve this goal, we always record all data in a manner that is:

- attributable, meaning that it is clear who recorded the data is known;
- legible, meaning that it can be reliably read, viewed, or used;
- timely, meaning that it was recorded at the time of the event;
- original, meaning that it is the source or authentic record and not an unauthorized copy; and
- accurate and complete.

## Patient and Trial Participant Rights

Participants in trials sponsored by us and patients using our products put their trust in us. All our activities must always have a clear focus on protecting, and improving, the safety and well-being of study participants as well as respecting the rights of patients.

If we become aware of any adverse event or adverse reaction that could be associated with any of our products or product candidates, we must immediately report it to the pharmacovigilance team in accordance with our **SOP Collection and reporting of safety- and quality-related information**. This applies regardless of whether we learn of such issue in a professional or a private setting, and regardless of whether or not we know or believe that there is a causal link to the use of our product.

Furthermore, we take particular care to ensure that all patient and trial participant data is collected, processed, and disposed of in compliance with the applicable data privacy laws and standards.

We are committed to developing and providing products that are safe, effective and of the highest quality, and to protect the safety and well-being of patients and trial participants. We are all responsible for reporting safety, quality, and performance issues concerning our activities or products, no matter how we learned of the issue.

**Remember: We speak up!**



# We interact ethically with healthcare professionals and patients (1/2)

We are committed to the highest standards of ethics and integrity, particularly in our interactions with healthcare professionals and patients. We earn the trust in our products and our company through our uncompromising dedication to quality and excellence. We will not tolerate any illegal or unfair activities, or the use of improper influence on healthcare professionals or patients, to promote our products and services.

## Interactions with healthcare professionals

As part of our work, we interact with healthcare professionals and may rely on their services for our research and development or educational and promotional activities.

When doing so, we act with integrity and transparency and avoid actions that may be perceived as bribing, misleading or otherwise improperly influencing healthcare professionals.

### Services from healthcare professionals

We may request services from healthcare professionals, such as consultancy work or speaker engagements. These interactions are based on high standards of ethics, integrity and fair remuneration for services actually performed:

- We will only engage healthcare professionals for services for which we have a legitimate business need. We will never request services or pay a fee to a healthcare professional to influence their medical judgment or their prescription or purchasing decisions or those of their employing institutions.
- We will compensate services at fair-market value only.
- We ensure that the engaged healthcare professional complies with all applicable laws and professional standards.

### What is a healthcare professional?

Any person that is a member of the medical, dental, pharmacy or nursing profession or any other person who, in the course of their professional activities, may eventually prescribe, purchase, supply, recommend or administer one of our products.

### Information, promotion and scientific exchange

- We inform healthcare professionals about our products and our activities in an accurate, fair and balanced manner that enables them to form their own opinion on the therapeutic value of our products.
- In all our communication about our products, we fully comply with all advertising and promotion restrictions under applicable laws, regulations and industry codes.

## Q&A



### Question

I sit next to a doctor at a conference for cancer immune therapies. We talk about our new promising RNA method, but he seems unpersuadable and prefers other therapy options. Since I supervised the (successful) first clinical phase, I want to convince him about our method.

### Should I continue to speak with him about it?

### Answer

While being passionate and convinced about our work, we should always respect the opinion of other healthcare professionals. We must especially never improperly influence them, as they are experts in their fields themselves. We have to trust that their decisions are made in the best interest of their patients.

# We interact ethically with healthcare professionals and patients (2/2)

## Interactions with patients

Improving the well-being of patients is at the center of what we strive for. Feedback from patients and patient organizations is, therefore, highly valuable for our work. We recognize that they have unique interests and experiences. When we interact with patients and patient organizations, we do so respectfully, listen to them and inform them, but never improperly influence their views, decisions, missions or policies.

## Gifts and hospitalities

In general, we do not offer, promise or grant any gifts or other advantages to healthcare professionals, healthcare organizations, patients or patient organizations, because gifts or other benefits present an inherent risk of being perceived as influencing the recipient in their decisions or views with respect to our products.

However, in certain circumstances it may be appropriate to provide reasonable, modest hospitality or grant other modest advantages. In order to avoid ambiguity as to what hospitality or other advantages may be granted, we grant hospitalities or advantages only to the extent that they are explicitly allowed under local laws and our respective guidelines, such as the [Anti-Bribery, Corruption and Conflict of Interest Policy](#). When in doubt about whether a hospitality or other advantage is appropriate, please contact the [Legal & Compliance team](#).

## Transparency

We value transparency and fully comply with all applicable laws, regulations and industry codes that require disclosure of transfers of value to healthcare professionals, healthcare organizations patients or patient organizations.



No gift, payment, hospitality or other advantages may be granted to healthcare professionals, healthcare organizations, patients or patient organizations without the approval of the Legal & Compliance Department. If in doubt, we will contact our [Legal & Compliance Department](#) for further advice.

**Remember: We speak up!**



**We Follow the Letter and Spirit of the Law**

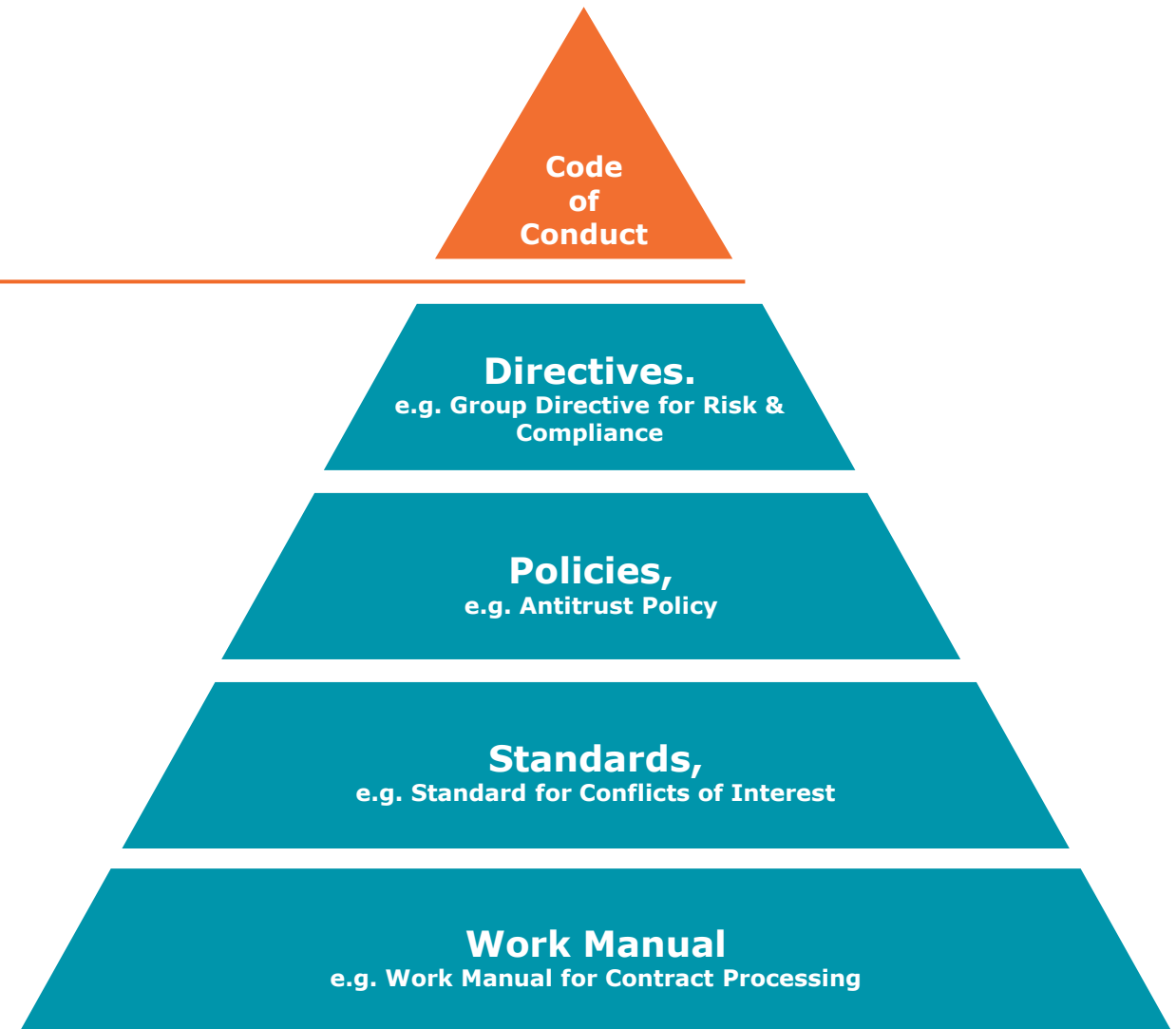
*The Compliance Management System at CureVac as well as the respective obligations of the RNA people are set out in several Compliance instruments. The **Code of Conduct** is at the top of the hierarchy. We must act in accordance with the Code of Conduct at all times.*

## Adoption

This Code of Conduct has been approved by the Management Board of CureVac NV on December 8<sup>th</sup>, 2022 as a corporate group policy and was last updated on September 20<sup>th</sup>, 2024 . It has come into effect upon publication and supersedes all prior versions of the Code of Conduct.

## Ownership and Involvement

Responsibility (Document Owner)	Accountability	Involvement	Approval
Compliance Officer	Management Board	Finance / HR / Commercial / ESG Procurement / Data Protection Officer	Works Council





## Our responsibility (2/2)

We follow all laws and regulations applicable to our company. We also observe our own Compliance instruments or other applicable internal regulations. We know our Compliance instruments and other internal regulations to ensure that we conduct our business in a lawful manner.

### How do we ensure Compliance?

Whenever we are uncertain regarding legal issues, we read the relevant Compliance instruments. In case of doubt, we ask our Legal & Compliance Department for advice.

#### Which Compliance instruments should I be aware of?

- [Directive for Risk and Compliance](#)
- [Policy for Delegation of Authority and Authorization](#)
- [Anti-Bribery, Corruption and Conflict of Interest Policy](#) and the [Standard for Conflicts of Interest](#)
- [Antitrust Policy](#)
- [Export Control Policy](#)
- [Insider Trading Policy](#)
- [Rules of Procedure for the Complaints Mechanism - "Speak Up"](#)
- [Data protection Guideline](#) and [supplementing data protection policies](#)

All instruments are available on the intranet page of the [Legal & Compliance Department](#).



# We fight bribery and corruption (1/2)

## We won't tolerate bribery, corruption and fraud

In any of our actions, we always act in accordance with the applicable anti-bribery, anti-corruption and anti-fraud laws no matter where in the world we work. We – the *RNA people* – believe that our success is based on the quality of our products and services, and never on unethical or illegal behavior.

We do business in a transparent and ethical manner. It is up to us to speak up and report any suspicion of bribery, corruption or fraud and to have transparent conversations to assess situations that bear a higher risk of bribery, corruption or fraud.

## We are committed to zero tolerance regarding bribery and corruption

As a company, we – the *RNA people* – support free competition among RNA manufacturers and distinguish ourselves from competitors through the quality of our products and services.

We, therefore, have a zero-tolerance policy regarding bribery and corruption, as such behavior – or even the suspicion of such – is not in line with our values and can damage the reputation of our company as well as lead to severe penalties and fines.

Bribery and corruption can occur in a variety of ways and situations. Especially bribery in commercial practice in the healthcare sector or in dealings with public officials is a criminal offense.

## We won't accept nor offer bribes in the commercial context

Primarily, we must ensure that we do not engage in bribery and corruption in business dealings with other companies.

We would be committing a criminal offense, should we (directly or indirectly) offer, promise or grant an inappropriate advantage to an employee or agent of another company or a third party in favor of influencing a decision or violating their duties towards their company in the context of purchasing goods or services from us.

It is equally prohibited for us to demand, be promised, or accept an inappropriate advantage in favor of influencing a decision by our company to purchase goods or services, or in return, for breaching our obligations to our company.

## What qualifies as an inappropriate advantage?

The threshold may vary from situation to situation.

The general rule is: An advantage is inappropriate if an impartial third party may regard the advantage as significant enough to influence a business decision. This may apply, for example, to invitations to shows, trips, lavish dinners or gifts that exceed a minimal value. It can also include such things as employment opportunities or internships for friends and relatives.

## We do not illegally influence public authorities

We cooperate closely with public authorities during the development, production and export of our RNA products, especially concerning approval and monitoring of our products. This is an extremely sensitive area, and it is very important for our company's reputation in the public perception that we are transparent in our dealings with governments, members of parliament and any other public officials.

### How we live our zero-tolerance policy

We never unlawfully influence decisions or acts by business partners, public officials or healthcare professionals!

# We fight bribery and corruption (2/2)

Directly or indirectly offering, promising or granting an inappropriate advantage to a public official in favor of a performance (or omission) of an official duty constitutes a criminal offense. The offense is even more severe if the public official also violates their official duties. Illegal influence also includes payments of bribes to public authorities or officials and is, therefore, prohibited. Remember that in many if not most countries, healthcare providers are considered public officials.

## Liability of our company

We as a company can also be subject to significant penalties and fines for bribery and corruption violations committed by our employees.

Further details on the subject of bribery and corruption are set out in our [Anti-Bribery, Corruption and Conflict of Interest Policy](#).

**Remember:** It is important that we and our company keep accurate records of all financial transactions (see also pages 35-36).



**Guidance:** If we are not sure whether offering or accepting a gift, an invitation or another advantage is permissible, we can always refer to our [Anti-Bribery, Corruption and Conflict of Interest Policy](#).

In case this policy does not answer our questions, we may at any time contact our [Legal & Compliance Department](#) for further advice.

**Remember: We speak up!**

## Q&A



### Question

One of our colleagues suggests that, as a promotion strategy, we approach doctors, who vaccinate in their medical offices, and offer them a tablet so that they will always recommend and use vaccines based on CureVac's technology platform.

### How should I respond?

### Answer

We reject the proposal and explain to our colleague why such a strategy is not acceptable. Offering a tablet to an HCP in order to influence their decision for one of our products is a textbook example of an inappropriate advantage. If there are remaining questions, we request guidance from our direct supervisor or the Legal & Compliance team. In case, we get the impression that the colleague still wants to pursue this strategy or that such offers may have already occurred in the past, we must immediately report the incident to our Legal & Compliance Department.

# We protect personal data and adhere to data privacy laws (1/2)

## Responsible handling of personal data is crucial to our scientific success

Our scientific work in the RNA sector is data-driven. The personal data we process with regard to our research patients is a key element of our scientific success. Therefore, we must safeguard and protect such personal data the best we can. The same applies to personal data of our employees, business partners and other individuals we process.

### What is personal data?

The scope of the term **personal data** is very broad. Any information that could be used to directly or indirectly identify individuals, such as name, date and place of birth, address, email address, government or insurance identification numbers, online identifiers and data linked to such identifiers, is regarded as personal data. Therefore, many types of data we handle in our daily practice – from trial subject data to employee payroll information – are personal data.

### What are special categories of personal data?

Some types of personal data are afforded higher protection due to their sensitivity and the potential higher risk for concerned individuals. In particular, patients' health records and other health information such as clinical trial data, genetic and biometric data and any personal data revealing racial or ethnic origins are considered special categories of personal data and their processing is subject to even stricter regulations around the world that include even harsher adverse consequences in case of their violation.

### What rights do individuals have regarding their personal data?

Individuals have a number of statutory rights regarding their personal data. Depending on the specifics of their relevant jurisdiction, these can include the right to inquire about and access their data, the right to have such data corrected or deleted, the right to object to the data processing and even the right to have their personal data transferred to another entity.

## How do we handle personal data?

Regardless of our role in our company, we are all responsible for handling personal data with due care and in compliance with the requirements of applicable data protection laws and regulations.

That means in particular:

- We act **lawfully** – we only process personal data in a lawful and fair manner and in particular, only when we can rely on the individual's consent or a statutory legal basis for the processing.
- We are **purpose-driven** – we only process personal data for specified, explicit and legitimate purposes and do not process personal data in a manner that is incompatible with those purposes.
- We are **minimalistic** – we only collect the personal data we need to achieve our business goals and legitimate processing purposes, and we only keep personal data as long as is necessary for the purposes for which the personal data is being processed, unless specifically authorized by law.
- We are **transparent** – we always inform our clinical trial subjects/customers/employees and other concerned individuals particularly about what personal data we process, why and on what basis we process it, to which recipients we transfer personal data and how long we intend to keep such data before deleting it.
- We **protect** personal data – we ensure that personal data is not misused, falsified or disclosed to unauthorized persons (within or outside our company) and that personal data is always processed and kept in a manner that ensures appropriate security.
- We ensure **accuracy** – we ensure that personal data is accurate and, where necessary, kept up to date.



# We protect personal data and adhere to data privacy laws (2/2)

## What is important when personal data is disclosed or shared?

Personal data may not be freely shared with any third-parties outside the company. In case we need to engage third-parties to process our data on our behalf, we will have to conclude specific processing agreements that ensure adequate protection of the data. Please note that third-parties also include all legally independent companies of the CureVac Group, as usually data protection regulations do not provide privileges to groups of entities in this regard (i.e. the regulations for data transfers apply regardless of whether or not the recipient company is within the same group of entities).

In case personal data needs to be disclosed to third-parties (including other companies belonging to the CureVac Group) which process the disclosed personal data for their own purposes (rather than on our behalf), including to law enforcement or to health and safety bodies or to other regulatory authorities, it is our responsibility to make sure such disclosure is lawful and that an appropriate legal basis for such disclosure exists. Therefore, we will always include the Data Protection Officer (DPO) and his team in these circumstances, before any personal data is handed over to anybody outside the CureVac Group.

Additional requirements need to be complied with in case of cross-border transfers of personal data.



## What else do we need to consider – especially regarding personal data of clinical trial subjects?

As a science-based company, we depend on the integrity of our data. In other words, the way we manage our data will impact our research ability. We, therefore, must ensure that the data we store is accurate. Only accurate, complete and trustworthy data records enable us to meet the highest research and product quality standards which we as *RNA people* stand for.

Also, concerning our clinical research, we must be aware that many jurisdictions provide specific regulations in regard to how the research data may be generated, how it must be safeguarded and how it may be processed further. Therefore, we ensure that all applicable legal requirements are complied with in an adequately documented matter to allow for optimal future use of our research data.

### What do I do if...

I become aware or suspect any unauthorized disclosure or misuse of personal data?

- Report your suspicion immediately to our [Data Protection Officer](#).

I have a specific question regarding data privacy or any applicable statutory or regulatory provisions (such as the EU General Data Protection Regulation, GDPR)?

- Contact our Data Privacy Officer and his team under [datenschutz@curevac.com](mailto:datenschutz@curevac.com)

I want to learn more about our handling of personal data?

- Refer to our [Data Protection Guideline](#) and [further data protection policies](#) and participate in data protection trainings.

# We compete fairly (1/2)

## We need fair competition

Our scientific research, our products, our patients and our company benefit from a competitive marketplace that adheres to the principle of fair competition within legal boundaries.

## Legal boundaries of fair competition

Antitrust and competition laws pursue two objectives.

**Antitrust laws** promote unrestricted competition among us and our competitors; prevent collusive interactions such as price fixing, bid rigging, market allocation and supply restrictions; and allow new companies to enter the market. Antitrust laws also apply to vertical agreements with distributors and suppliers and prohibit collusive arrangements such as resale-price fixing or territory restrictions. In addition, antitrust laws prohibit the abuse of a market-dominant position.

**Competition laws** protect consumers by ensuring fair business practices within our direct product distribution and sales structure. A company must, in particular, not perform any actions that may mislead consumers. Competition laws also include provisions on advertisement, on the protection of competitors, as well as on unacceptable harassments of consumers. In the end, acting fairly towards consumers on the relevant market also fosters fair competition between competitors.

Our [Antitrust Policy](#) provides guidance and helps us navigate safely through the applicable Antitrust and competition laws.

### Example:

Antitrust laws prevent two biopharmaceutical companies from reaching mutual agreements, such as price agreements for drugs that both companies are producing. Competition laws ensure that both companies abide by the rules so that there is a functioning competition, which ultimately leads to individuals paying fair prices for drugs.



# We compete fairly (2/2)

Knowing that everyone, particularly our patients, will benefit from fair competition, we will follow antitrust and competition laws in all markets where we operate and avoid any appearance of unfairly restricting the market dynamics.



## We collect information about competitors in an ethical and legal manner

In the field of medical research, we depend on information and knowledge. We always gather our information fairly, legally and transparently, by adhering to the following rules:

- We only use public or other permitted sources (e.g., newspapers and websites) for our market intelligence research.
- Whenever and wherever we gather information, we are transparent about who we are and whom we work for.
- We do not exchange competitively sensitive information (e.g., on prices, costs, customers, sales volumes, production capacities, etc.) with competitors.

## How do we help to promote fair competition?

- **We never** enter into any agreement or concerted practice with competitors to fix prices or conditions on our products, nor do we allocate markets, territories or customers with our competitors or agree on restricting supply.
- **We never** prevent our competitors from entering the market. All medical companies should have the same goal – the well-being of humankind. We are particularly cautious in markets where we have a strong position and do not hinder competitors or exploit customers or suppliers.
- **We are always cautious** during medical conferences, trade associations and other industry gatherings. We never discuss and exchange sensitive business information such as insights regarding our medical research, clinical trials, product pricing, or promotional and marketing strategies.
- **We deal honestly and fairly** with our customers and patients. We are truthful about our products and never take advantage of our customers or patients by providing misleading or deceiving product information.
- **We follow** our respective guidelines such as the [Antitrust Policy](#).
- **Whenever you are in doubt** as to the legality of a proposed behavior, **reach out to our [Legal & Compliance Department](#)**. Any misconduct regarding antitrust and competition laws has tremendous negative effects on our reputation and may lead to significant fines for our company and potentially the persons involved, claims for damages from customers or competitors, exclusion from public tenders, and negative press.



# We comply with trade laws

## International trade laws/sanctions/embargoes

These are imposed by governments and international organizations, including the UN and the EU, around the world to support their economic, strategic or national security interests. In order to provide our RNA products and services to patients and vaccines worldwide, it is important that we comply with all applicable customs, import and export sanctions and, if applicable, anti-boycott laws and regulations (**Trade Laws**) of the countries in which we operate. Failure to comply with these Trade Laws may result in civil and criminal liability as well as loss of export privileges.

## What does this mean for our business practices?

It is our personal responsibility to know the relevant Trade Law restrictions that may apply to our business operations and dealings with customers or business partners. In other words, if we are responsible for or involved in the sales, movement and/or delivery of our RNA products (including ingredients, ready-made or finished products, etc.), people, services, technology or money across international borders – especially non-EU borders – we have to ensure that we comply with the Trade Laws of the countries in which we do business and that we do not violate, among other things, US or EU sanctions or embargoes.

**Good to know:** Our Export Control Guideline provides guidance and helps us navigate safely through the applicable trade laws that may be relevant to our company's day-to-day business.

**We are expected to** respect the applicable Trade Laws by carrying out the following:

- Screening our current or future business partners and customers to make sure they are not on national or international sanctions lists applying to the transaction in question.
- Verify which country a particular delivery or transaction relates to in order to determine potentially applicable sanctions, including US or EU sanctions.
- Ensure that all items delivered abroad are accurately classified for export control and customs to ensure compliance with export control and sanctions regulations.
- Observe restrictions and all other requirements related to the import, export or delivery of items.

Further details are set out in our Export Control Guideline.

Did you know that US sanctions may apply to the following?

- All US persons (citizen, permanent resident and companies) in the US and abroad
- US goods (commodities, software and technology)
- Transactions through the US financial system (including transactions in US dollars)



**Guidance:** For questions regarding cross-border transactions, please contact our Legal & Compliance Department.



## We prevent money laundering

We do not look the other way when it comes to illegal activities. However, some criminal activities like money laundering are often not obvious and are hidden in the presumed day-to-day business. This is the reason we should be particularly sensitive to any red flags that might link a payment to a criminal background.

## What exactly is money laundering?

Funds generated through criminal activity – like drug trade, tax evasion or fraud – are moved through legitimate businesses with the aim of hiding their criminal origin. Terrorist financing refers to any type of financial support for a terrorist organization, whether or not from illicit activity, that can also be linked to money laundering. Although money laundering offenses are often conducted unintentionally, countries have imposed significant punishment not only for intentional, but also for negligent misconduct.

## How can we prevent money laundering?

It may not be obvious whether money originated from a legitimate source. Therefore, it is crucial to learn as much as possible about the source, background and origin of the money our company intends to accept.

In order to prevent money laundering, we should follow certain ground rules:

- Never accept cash payments, as we cannot trace the origin of the cash.
- Never transfer money to or accept money from private bank accounts of business partners or third parties to conceal or hide a transaction.
- Always verify the identity and credentials of potential customers, business partners and other third parties before entering into contracts or business relationships.

**If we detect any red flags that indicate money laundering, we must reach out to the Legal & Compliance Department for guidance before we proceed with the affected business activity.**

## We must be alert in the following situations:

- We are requested to transfer payment to or from entities and countries that are not related to the business transaction.
- We are requested to book a payment that does not follow our regular internal processes (e.g., invoice clearance).



# We prevent fraud, cybercrime and terrorist financing

## What we need to know about fraud and how we can prevent it

### What is fraud?

Fraud is prohibited worldwide. The criminal laws of various countries may have different definitions of "fraud." Based on our broad understanding, fraud includes the intentional deception of a person, company or organization to obtain an unauthorized advantage, which may be money, property, services or a similar advantage.

### What are the dimensions of fraud?

Fraud has multiple different dimensions that we must prevent and be aware of, for example:

#### 1. We prevent fraud from within our company to the detriment of third parties

We must always be truthful about the effectiveness of our products. The same applies to our data records of clinical trials or clinical research patients. We do not sugarcoat values or products, and we are transparent and communicate only facts.

#### 2. We prevent in-house fraud that will harm our company

Our company offers us many advantages. Let us be faithful in return. When we submit, for example, our business travel claims, we submit only our actual costs, attach the appropriate receipts and check our submission for clerical errors.

#### 3. We prevent our company from being a victim of fraud – keyword: cybercrime

The economic damages caused by cyberattacks on companies is tremendous and on the rise. The attackers constantly develop new cybercrime tactics and put these into practice.

We must be aware of these kinds of attacks and protect us and our company assets in the best way possible, such as via our IT security network. But the IT security network is only one facet of protection. We as users must be sensitive to the potential cybercrime scenarios in our daily business as well.

### Cybercrime and terrorist financing

We would never intentionally finance or support a criminal and terrorist association. However, financing of terrorist associations is often related to cybercrime and turns the victim into the perpetrator, either because the cybercriminals deceive the victim into making an unwanted payment (e.g., payment to a false bank account based on forged invoices) or any payments issued in the course of a ransomware attack. Be careful: Both situations may constitute criminal offenses. This also demonstrates the importance of cyber security for CureVac.

### How can we prevent fraud, cybercrime and terrorist financing?

#### Most important: We speak up!

If we suspect fraud or similar criminal acts, we contact our direct supervisor and involve the Legal & Compliance Department.

To avoid cybercrime attacks,

- **we do not open suspicious emails**, we do not click on links sent by unknown senders, and we do not install programs without prior clearance from our IT Department.
- **we are cautious and double-check** – Illegal harvesting of information often occurs hidden on sites that look like the original but are in fact fake.
- **we update our software** as recommended and **change our passwords** regularly.
- we **handle** our technical devices with care. In case of theft, we immediately inform our IT Department.
- we attend our **respective trainings**.

Cybercrime attacks pose great risks to our company. Therefore, we are all urged to be perceptive and report any incidents or suspicions to our IT Department.



**We Protect CureVac**

# How to use and protect our company assets

## What exactly is meant by the term "company asset"?

The ideas and technologies we at CureVac develop, the facilities we use to research, the technology that connects us with others, the communication we exchange via emails, the computers and mobile devices CureVac offers us to perform our duties, etc. are all understood to be **company assets** that we need to protect.

## How can we protect our company assets?

There are various ways to protect our company assets.

### ▪ Physical (including electronic) company assets:

All resources that are made available to us (e.g., computer, mobile phone, company car, etc.) must not be lent, sold or given away unless we are authorized to do so. Furthermore, we take good care of the company assets provided to us and never leave our computers or mobile phones unattended in public spaces. Also, we ensure that our electronic key cards cannot be used by anyone else. In the event of loss or theft, we immediately inform our IT Department. Furthermore, we utilize our electronic devices for business only. For further information regarding permitted IT use at CureVac, please refer to our IT Policy.

### ▪ Intellectual property:

As a medical research company, our most valued goods are the technologies, trademarks, patents, knowhow, experience and ideas we develop — in short, we must fiercely protect our intellectual property. We don't discuss ideas or inventions with others, as we might disclose confidential information. This obligation may even last beyond our employment relationship with CureVac. In this regard, please remember that CureVac continues to own any work product, idea or technology we develop during our employment relationship.

We adhere to our IT Policy and never share login data and/or passwords to protected systems.



We do not use company assets for external business or other personal gain.



We do not use company assets, such as computers, for illegal or unethical activities (e.g., file sharing).



When leaving our company, we must return all CureVac-owned equipment like technical devices, company documents, access cards, tokens and other company-owned assets.

## Q&A



### Question

I broke my mobile phone and our IT Department provided me with a new phone. I was not immediately asked to return the broken device; may I just keep it and even sell it at a later point in time?

### Answer

Personal use of company-owned technical devices is prohibited. The mobile phone also remains company property and must be returned to our company even if it is defective.

### Question

I work in the laboratory. My daughter has a science-based research project in school and wants to prepare and view some samples under the microscope. Am I allowed to borrow some equipment (platelet, pipette, etc.) over the weekend?

### Answer

It depends. Any use of company-owned assets like this for personal reasons would require approval from my supervisor or the Compliance Officer.



# We do not engage in insider trading (1/2)

## We play fair!

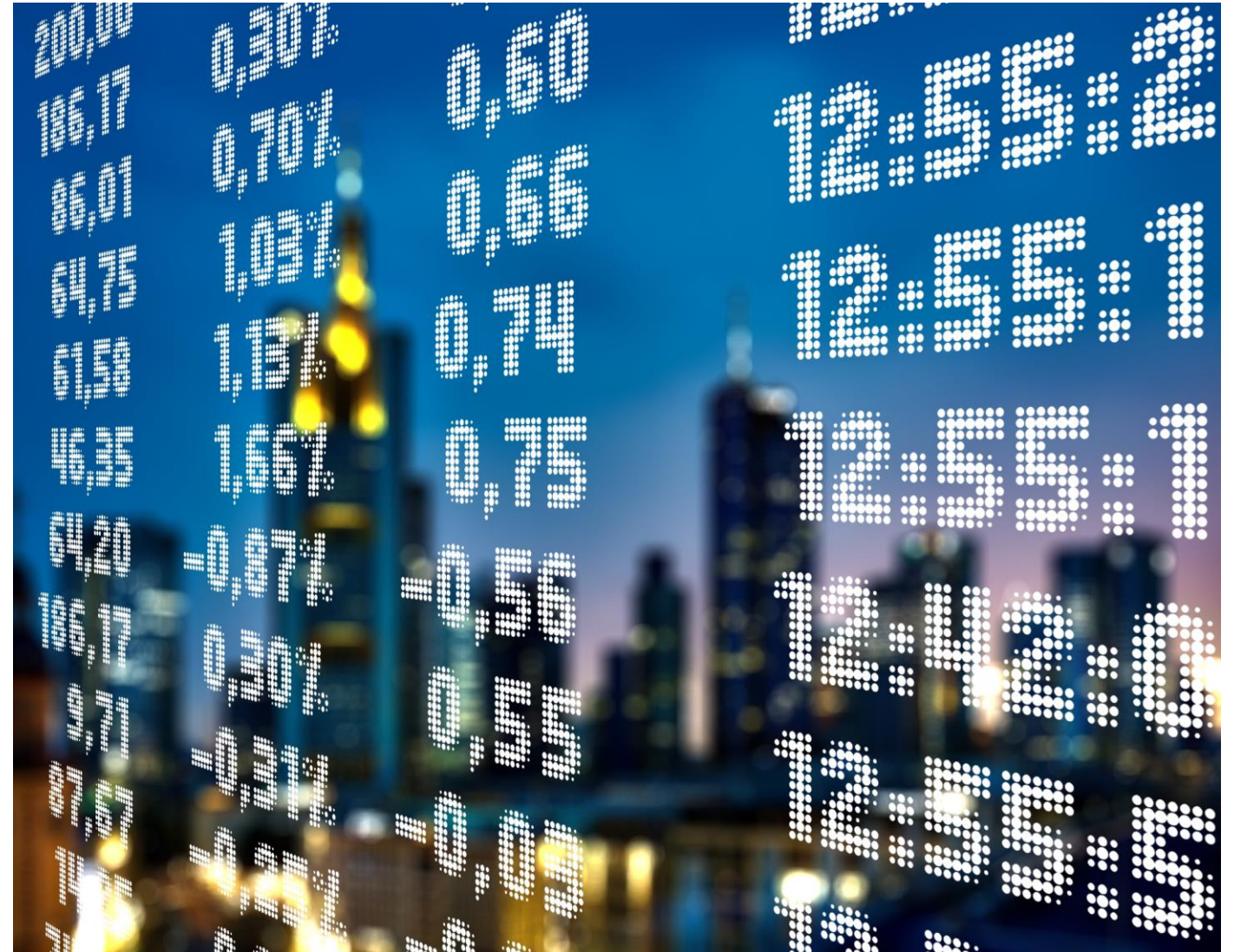
Insider trading is the embodiment of unfair business conduct and endangers our company. It is illegal if we buy and sell securities based on material nonpublic information regarding our own company or from other companies (inside information). Therefore, we may not engage in securities trading with respect to companies or disclose such information if we have acquired special non-public knowledge which we only became aware of due to our work for our company. We believe in the balance of securities trading, which is only possible because everyone must abide by the same rules. It is against these rules if we trade with special inside knowledge or pass this special inside knowledge on to third parties so that they can trade with it.

Taking advantage of our privileged access to inside knowledge of our company or our company's business partners is considered a breach of our loyalty obligations toward our company and opens us up to severe penalties.

### But what exactly is considered as insider information?

A lot! Just to name a few:

- Any information regarding earnings release (prior to the official earnings release)
- A planned merger or acquisition
- Information on material study data, the introduction of a new product, a new major customer or a new important business partner
- Any information regarding legal matters (in particular, but not limited to litigation matters)



# We do not engage in insider trading (2/2)

## Am I an insider?

### How do I know for sure?

We all may potentially be exposed to information concerning our company, our company's business partners or even our competitors that are not (yet) publicly available. However, if such information were known to the public, the (trading) public might act on such information, e.g., sell or buy company stocks or other securities. That being said, we all may be insiders if we come into contact with highly valuable confidential information.

Apart from the information that we might learn by coincidence and that may turn us into insiders, our company has defined two basic types of insiders – Permanent and Temporary Insider.

Specific positions in our company are regularly in contact with insider information (e.g., member of executive board, head of accounting, head of controlling, etc.) and are, therefore, categorized as Permanent Insider.

In case we are involved in confidential projects with access to insider information, we may be classified as a Temporary Insider.

In the latter case, however, we have been informed of our special role via email.

Regardless of our respective classification – Permanent or Temporary Insider – we will not engage in securities trading with respect to insider information that we have acquired through our work for our company. We neither trade on insider information ourselves, nor pass such insider information on to others, e.g. family and friends, so that they may trade.

If you are in doubt as to whether information may be considered insider information, please refer to our [Insider Trading Policy](#), the intranet page with [Information for Insider](#) and consult with our [Legal & Compliance Department](#).

## Q&A



### Question

In an internal meeting, I overheard that one of our business partners is going to buy another pharmaceutical company. This merger will transfer a completely new technology to our business partner, giving it a competitive advantage.

I am quite sure that this will cause our business partner's share price to rise rapidly. I don't trade shares myself, but I would like to pass this information on to a good friend.

### Any objections?

#### Answer

Yes. This "tipping off" would be considered as illegal insider trading, even if you do not intend to buy the stocks yourself!

**Remember: We all have access to non-public information in our day-to-day business and may, therefore, all be considered insiders.**

# Accurate records and information (1/2)

## Accurate reporting and accounting

In order to maintain our **good reputation** as a leading researcher of RNA products, to abide by regulatory requirements and to avoid **corporate liability**, we must ensure that we correctly handle the **data, information** and **records** we create or for which we are responsible.

How to handle data, information and records:

- ✓ We only share data, information and records that are true, complete and accurate.
- ✗ We never make false or misleading statements or entries in reports, publications or expense reports.

When we operate in the area of reporting and accounting, we must be familiar with and comply with applicable laws, internal accounting and reporting standards, and external standards for financial and non-financial reporting. We make sure to follow all internal processes and accounting principles so that our records accurately reflect all transactions.

- ✓ We never falsify records or accounts or misrepresent facts. This could be subject to criminal sanctions and fraud.
- ✓ We always record and classify transactions in the proper accounting period and department.
- ✓ In case we have questions, we refer to the **finance and tax team** for help.

Maintaining **accurate corporate books** and **records** is necessary to achieve and build **financial integrity**, as well as to comply with our regulatory obligations.

## Q&A



### Question

I am a team leader of a medical research team and I had to fight hard to secure this year's approved project budget for my team. We were thrifty and did not use all of the budget. I have a new research idea that is not approved/supported by our company; therefore, I would not receive a project budget even if I'd apply for it. May I just use last year's unused project budget?

### Answer

No. CureVac assigns and approves project budgets. We are not entitled to use project budget surpluses as we please. If a project budget has not been used, we must inform our supervisor so that the budget may be reallocated.



## Accurate records and information (2/2)

### Public communication and disclosure

Since we are a publicly listed company and operate in the sensitive area of medical product development, we share information **carefully** and **only if needed**.

- ✓ We always act **transparently** and disclose information to the public only through the channels designated by the company.
- ✓ We promote full and understandable disclosure in reports filed with the relevant authorities and in other public communications.
- ✗ We are not permitted to make any disclosure of material non-public information regarding our company to any person, including friends and family, or entity outside the company.
- ✓ We ensure that personal views are labeled as such when expressing opinions in public and that our actions or statements **do not harm or damage the reputation of CureVac**, its shareholders or employees when appearing in public on behalf of CureVac.



### Q&A



#### Question

I saw a post on Twitter about our company that contains incorrect information about our mRNA technology. May I reply online and set the record straight?

#### Answer

No. We only comment or speak on behalf of our company if and when we are authorized by the appropriate level of management. We notify the communications team so that the situation can be addressed appropriately.



# We are eager to learn

## We are eager to learn every day

CureVac's mission is to develop a new generation of medicine; to achieve that mission, we must enhance our knowledge. This is not limited to our scientific research, but includes our ethical and legal knowledge as well.

We believe in continuous self-improvement. We learn from our mistakes and constantly try to educate ourselves. The foundation of our company is based on the intrinsic motivation of each individual. We are focused and engaged, and CureVac is determined to support us wherever possible.

Therefore, CureVac offers us a broad spectrum of training opportunities.

### Why is training so important?

#### With constant training, we are able to:

- increase awareness of a wide range of legal and ethical issues
- understand what is right and wrong
- sharpen our self-reflection
- improve our soft skills and thus improve interactions with each other and our partners
- sustain and maintain our ethical culture



## Trainings

We always want to uphold this Code of Conduct and the rules set forth therein.

Therefore, CureVac offers several (mandatory) trainings. In order to stay up to date, we are required to periodically refresh our trainings.

## Glossary

## What does our CoC mean when referring to:

**Bribery and Corruption** are generally referred to as acts of influencing the recipient through inappropriate advantages to the benefit of the giver or generally as improperly influencing someone's acts or decisions or violating their duties or obligations. The recipient can be a healthcare professional, a public official, one of our own employees or an employee of one of our business partners. Bribery and corruption are prohibited worldwide and generally constitute criminal acts. Further information on this important topic is provided on [page 22](#) and [page 23](#) and in our [Anti-Bribery, Corruption and Conflict of Interest Policy](#).

**Company Assets** include the ideas and technologies which are being developed at CureVac, the facilities used to research, the technology that connects us with others, the communication exchanged via emails, the computers and mobile devices CureVac offers us to perform our duties, etc. Further information on how to protect our company assets is set out on [page 32](#).

**Conflicts of Interest** can arise when personal interests are mixed with the interests of CureVac. Conflicts of interest situations are explained on [page 15](#) and in the [Standard for Conflict of Interest](#).

**DPO (Data Protection Officer)** is the responsible function and go-to person in case of data privacy-related matters. More information is available on [page 25](#).

**ESG** is an abbreviation for Environmental, Social and Governance and refers to the process of achieving and promoting in particular sustainability, environmental and animal protection, respect for human rights, and a reduction of CureVac's carbon footprint. The characteristics of ESG are described in more detail on [page 11](#).

**Fair Competition** means competition that is based on quality, price, and service rather than unfair practices. More information on fair competition is provided on [page 26](#) and [page 27](#) as well as in the [Antitrust Policy](#).

**Financial Integrity** is essential to gain the trust of our investors, maintain our excellent reputation and avoid corporate liability. To achieve financial integrity, maintaining accurate books and records is essential. To inform ourselves about financial integrity, we may refer to [page 35](#).

**Fraud** is the wrongful or criminal deception intended to result in financial or personal gain. CureVac has to be protected against fraudulent acts from third parties, in particular in connection with cybercrimes. You can find information on how to prevent [fraud, cybercrime and terrorist financing](#) on [page 30](#).

**Harassment** is a conduct that creates a disrespectful, hostile, humiliating or offensive environment. We must prevent harassment from happening at any time. The best way to do so is explained on [page 9](#) and [page 10](#).



### What does our CoC mean when referring to:

**Healthcare Professionals** include any person that is a member of the medical, dental, pharmacy or nursing professions or any other person who, in the course of their professional activities, may eventually prescribe, purchase, supply, recommend or administer one of our products. For guidance on how we interact ethically with healthcare professionals, we can refer to [page 17](#) and [page 18](#).

**Insider Trading** is the embodiment of unfair business conduct. It endangers our company. Insider Trading is illegal if securities are bought and sold based on material non-public information regarding our own company or from other companies. To learn more about what characterizes an insider, we may refer to [page 33](#) and [page 34](#).

**Money Laundering** is the processing of criminal proceeds to disguise their illegal origin. More information on how to prevent money laundering is provided on [page 29](#).

**Personal Data** is understood as any information that could be used to directly or indirectly identify individuals, such as name, date and place of birth, address, email address, government or insurance identification numbers, online identifiers and data linked to such identifiers. For more information on how personal data is protected, we should go to [page 24](#) and [page 25](#).

**Special Categories of Personal Data** refer to patients' health records, clinical trial data, genetic and biometric data, and any personal data revealing racial or ethnic origins. More information on how to handle personal health information is provided on [page 24](#) and [page 25](#).

**We speak up** whenever we suspect non-compliance with our ethics and integrity values described within this CoC. Further information on our speak-up culture and the protection that CureVac offers us is displayed on [page 12](#) and [page 13](#).

In particular, we speak up when we suspect any of the following issues:

- **Conflict of Interest**
- **Harassment**
- **Violation of regulatory and quality requirements**
- **Bribery and Corruption**





**Thank you!**