



## **Modern Slavery Statement 2024**

In accordance with Section 54(1) of the UK Modern Slavery Act 2015, Part 2 of Australia's Modern Slavery Act 2018, the California Transparency in Supply Chains Act in the United States of America, and Paragraph 11 of Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Canadian Act"), this statement outlines new and ongoing steps Moderna is taking during the financial year ending on December 31, 2024 to prevent modern slavery and protect human rights within our business and supply chains.

### **Our Company**

Moderna is a leader in the creation of the field of messenger RNA (mRNA) medicine. Through the advancement of mRNA technology, we are reimagining how medicines are made and transforming how we treat and prevent disease for everyone. By working at the intersection of science, technology and health for more than a decade, we have developed medicines at unprecedented speed and efficiency, including one of the earliest and most effective COVID vaccines.

Our mRNA platform has enabled the development of medicines across four areas: respiratory virus vaccines, latent and other virus vaccines, oncology therapeutics and rare disease therapeutics. In 2024, we became a multi-product company with the approval of our second commercial product, mRESVIA, our mRNA respiratory syncytial virus (RSV) vaccine for older adults. We also achieved four positive Phase 3 data readouts across our respiratory portfolio, further demonstrating our platform's potential to address significant unmet medical needs and advance public health.

With a unique culture and a global team driven by the Moderna values and mindsets to responsibly change the future of human health, we strive to deliver the greatest possible impact to people through mRNA medicines.

By the end of 2024, we had approximately 5,800 full-time employees with a presence in North America, Europe and the Asia-Pacific region, including 134 employees in Australia, 107 in Canada and 121 in the United Kingdom (UK).

In March 2022, Moderna announced the finalization of a strategic partnership with the Australian Federal Government to establish a state-of-the-art, domestic mRNA vaccine manufacturing facility in Australia. Construction in Clayton, Victoria commenced in December 2022. The facility was operationally completed in December 2024 and in 2025 is undergoing the required regulatory approvals to commence manufacture.

In April 2022, Moderna and the Government of Canada announced the finalization of a long-term strategic partnership to enhance pandemic preparedness, including a plan to



build a state-of-the-art mRNA vaccine manufacturing facility in Quebec. Construction in Canada commenced in November 2022 and was completed in February 2024.

In December 2022, Moderna and the UK Government announced the finalization of a long-term strategic partnership to establish a state-of-the-art mRNA research, development, and manufacturing facility in the UK. Construction commenced on the Moderna Innovation and Technology Centre in Oxfordshire in April 2023.

Moderna plans to bring manufacturing plants online in the UK, Canada and Australia in 2025.

## **Our Commitment to Human Rights**

Our commitment to corporate citizenship is built on a foundation of integrity, quality and respect. These values guide the creation and support of long-term programs that focus on patients, employees, the environment and our local communities. Our values guide our actions as we work to uphold human rights across our operations, supply chain, and partnerships.

Our commitment embraces internationally recognized human rights as articulated in the International Bill of Human Rights, consisting of The Universal Declaration of Human Rights (UDHR), the International Covenant on Civil and Political Rights (ICCPR) and the International Covenant on Economic, Social and Cultural Rights (ICESCR), and the International Labour Organization's (ILO) Core Labour Rights Conventions.

## **Our Supply Chain**

Moderna's supply chain is comprised of suppliers of goods and services: (i) to manufacture, store, and distribute our vaccine, such as raw materials, drug substance, drug products, testing, fill-finish services, warehousing, and transportation; (ii) for our research and development activities, such as clinical research organizations, laboratories, equipment, and supplies; and (iii) to run our business, such as information technology, professional services, sales and marketing, and facilities.

At Moderna, our manufacturing capabilities form a core component of our global value chain, supporting the entire lifecycle of our mRNA medicines, from research and development to full commercialization. Our supply chain includes both internal manufacturing infrastructure and strategic partnerships with contract manufacturing organizations (CMOs) across key geographies, including the United States and internationally.

Our manufacturing network enables supply for all stages of product development. We internally manufacture high-quality mRNA and drug product for research and development purposes. We scale up manufacturing of drug substance and drug product to meet Phase 3 clinical trial needs and commercial supply requirements.

Our internal network includes:

- *Moderna Technology Center (MTC), Norwood, Massachusetts:* A multi-building campus serving as our primary in-house manufacturing facility. MTC supports all

stages of product development, from preclinical and clinical studies to commercial production.

- *Marlborough Facility, Massachusetts:* Acquired in 2023, this site is undergoing expansion and, following licensure, will support our INT program.

In addition to our internal manufacturing capabilities, we collaborate with CMOs both in the United States and abroad, including in the EU, UK, and Canada. These partners support critical aspects of our supply chain, including the production of raw materials and fill-finish operations for our vaccines.

Our commitment to respecting human rights extends to our suppliers and partners. We understand that significant risks exist within global supply chains where visibility can be a challenge. Therefore, we use a combined approach of policies, tools, partnerships, and collaborations with industry coalitions.

### **Our Policies in Relation to Modern Slavery and Human Trafficking**

Moderna has policies in place which aim to minimize the risk of modern slavery or human trafficking and encourage reporting of any related concerns.

Our **Code of Business Conduct and Ethics** establishes the minimum standards that are expected from all our employees when conducting business and their day-to-day activities. All directors, officers, and employees are expected to review the Code and acknowledge their understanding on an annual basis.

Our **Human Rights Policy** establishes the obligation of our employees to protect human rights and report any concerns they may identify in the course of their work responsibilities, including those that may occur with a Moderna service provider or supplier. All our employees must read and acknowledge the Human Rights Policy during their onboarding process.

Our **Speak Up Hotline** empowers Moderna's employees, contractors and third parties to submit questions or voice concerns about inappropriate, unethical, or illegal behavior. This includes any allegations of modern slavery against our suppliers. Both employees and third parties may choose to submit reports anonymously, where permitted by law. Concerns can be made via email, phone, online or in-person. The web-based and telephone channels are operated via a third-party vendor. Moderna prohibits any form of retaliation or intimidation for reports made in good faith. Reports are handled on a case-by-case basis and concerns are investigated and acted on as required.

Our **Third-Party Code of Business Conduct** is embedded into contractual agreements with third parties, provides our standards and expectations for all with respect to human dignity, and the protection of human rights. We outline specific expectations on forced and child labor, fair treatment, wages and working hours, and freedom of association.

The Nominating and Corporate Governance Committee of Moderna's Board of Directors oversees the implementation and strategic alignment of human rights policies.

## Risk Assessment and Due Diligence

We are committed to working with suppliers and partners who share our dedication to respecting human rights.

Our Sustainable Procurement Program is designed to assess, manage, mitigate, and address sustainability and human rights risks in our value chain. Key elements of the program include:

- *Embedding Standards:* We incorporate our Third Party Code of Business Conduct into all contracts and terms & conditions, with clauses requiring notification to Moderna of any violations.
- *Comprehensive Risk Assessment:* The program evaluates third-party performance across critical areas such as labor standards, ethical business practices, environmental management, and health & safety.
- *Mitigation and Remediation:* Where risks, potential violations, or weak management practices are identified, we engage third parties to implement corrective actions and improvement plans.

Our Speak Up Hotline website can receive reports in all the languages spoken at Moderna affiliates worldwide. The Speak Up Phone line is comprised of five different phone numbers distributed within U.S. & Canada, Europe, Australia, Japan, and Korea and translated into eight languages (Spanish, French Canadian, French, German, Polish, Italian, Korean and Japanese).

We recognize that global human rights issues are complex and often require collective action. Moderna is a member of the Pharmaceutical Supply Chain Initiative (PSCI), joining peers and suppliers in our industry's most comprehensive coalition dedicated in developing responsible supply chains and focused on tackling human rights issues that exist in pharmaceutical industry. As a member, we can benchmark efforts, collaborate in working groups, share audit results, and leverage collective action.

## Our Key Activities

During 2024, Moderna took the following actions to assess and address risks:

### Training

We launched Moderna's Code of Ethics and Business Conduct in its digital-interactive version promoting immediate consultation. By the end of 2024, 97% of our employees completed training on Moderna's Code of Ethics and Business Conduct.

We continued training on Human Rights and launched an internal campaign to promote awareness of Modern Slavery, Moderna's commitment to Human Rights and the reporting mechanisms to raise such concerns.

## **Speak Up Reporting**

We enhanced our internal Speak Up reporting process by establishing a triage framework to assess and address reports related specifically to potential human rights violations in the supply chain. As part of this initiative, a dedicated cross-functional response team was formed, comprised of one representative each from Legal, Compliance, and Procurement. This team is responsible for reviewing and responding to relevant Speak Up reports and will meet annually to evaluate trends, identify potential gaps, and propose improvements to Moderna's Human Rights program. This structure supports Moderna's commitment to early detection, consistent handling, and continuous improvement in the management of human rights risks.

## **Due Diligence and Monitoring**

We continued implementation of Moderna's Cross-Functional Due Diligence Program that assesses third parties across multiple dimensions, including reputation and ethical behavior. This program included:

- Moderna's Procurement organization continued to leverage the due diligence questionnaire for key and high-risk suppliers. The questionnaire requires third parties to provide information about their policies on human rights, and workplace conditions to provide assurance these are consistent with our standards.
- Our Ethics & Compliance due diligence process obtains additional information from an external third party on high-risk key suppliers. This due diligence process includes a specific section on Human Rights, Modern Slavery and Employment practices.
- Moderna's Procurement organization continued ongoing due diligence and monitoring through a third-party solution, EcoVadis, to assess supplier's ESG performance on four key themes: Environment, Labor & Human Rights, Ethics, and Sustainable Procurement. The Labor & Human Rights theme covers criteria surrounding child labor, forced labor, discrimination, harassment, working conditions, human trafficking, and debt bondage. The EcoVadis solution enables Moderna to identify inherent modern slavery risks within the supply chain, assess specific supplier risk areas, verify the validity of supplier responses, and identify opportunities for corrective actions. In 2024, 72 percent of Moderna's supplier base by spend has been assessed through the EcoVadis framework. 85 percent of suppliers assessed scored a 'Good' (45-64 points) rating or above. We continue to follow up with suppliers when they score below 'Partial' (25-44 points) within the Labor & Human Rights theme for corrective action.
- Moderna continued collaboration with PSCI working groups to leverage collective action.

## Assessing Effectiveness

We are committed to measuring the effectiveness of our anti-modern slavery efforts. We use several *Key Performance Indicators* and review processes to track progress:

- *Number of concerns or reports received through the Speak Up Hotline related to modern slavery violations or any other Human Rights violations.* In 2024, Moderna did not receive any reports from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified, either at Moderna or in its supply chain.
- *Number of vendors identified through our due diligence process that have past records of modern slavery or any other Human Rights violations.* In 2024, our due diligence process did not identify any vendors that have past records of modern slavery or any other Human Rights violations.
- *The percentage of employees trained in Moderna's Code of Ethics and Business Conduct, which includes a chapter on Human Rights.* By the end of 2024, 97% of our employees completed training on Moderna's Code of Ethics and Business Conduct.

## Our Commitment for 2025

Moderna understands that tackling modern slavery requires an unending commitment and will continue to conduct due diligence of our supply chain as well as review and improve procedures to help identify and prevent the risks of modern slavery or human trafficking. With the goal of assessing and enhancing its existing policies and procedures during 2025, Moderna plans to:

- Continue to promote awareness through onboarding programs and internal campaigns on Human Rights, including UK's Modern Slavery Act (2015), Australia's Modern Slavery Act (2018), Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act, and other similar regulations across the globe, including the appropriate action to take when there is suspicion of violation of Moderna's Human Rights policy.
- Continue to monitor our Key Performance Indicators.

## Remediation Measures

Moderna has not identified any instances of forced labor or child labor, either within Moderna's activities or in its supply chain. We have also not identified any instances of loss of income to vulnerable families that resulted from measures taken to eliminate the use of such forced labor or child labor. We have therefore not taken any measures to remediate forced labor, child labor, or loss of income to vulnerable families that resulted from measures taken to eliminate the use of such forced labor or child labor during the financial year ending December 31, 2024.



## Consultation with Reporting Entities and their Owned and Controlled Entities

In preparing this joint statement, consultation occurred across the relevant entities. Key actions described in this statement were developed centrally but implemented locally in each reporting entity. These entities share several common directors—both internationally and locally—and operate with integrated functional support teams, including Human Resources, Legal, Regulatory, and Compliance. As such, they worked together to produce this statement in a coordinated manner, under the direction of senior managers with in-depth knowledge of each entity and the broader Moderna global business. In addition, relevant corporate functions such as Procurement, Supply Chain, ESG, and Compliance contributed information used in this statement.

I attest that the report has been reviewed and approved jointly by the corresponding Board of Directors of the entity or entities listed below, in accordance with the requirements of Section 54(1) of the UK Modern Slavery Act, paragraph 11(4)(a) of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act, and Part 2 of Australia's Modern Slavery Act 2018.

Based on my knowledge and having exercised reasonable diligence, I further attest that the information contained in this report is true, accurate, and complete in all material respects for the purposes of the applicable legislation mentioned in this statement, and the reporting year indicated.

I confirm that I am duly authorized to sign this statement and to bind the entity or entities listed below for the purposes of the relevant Acts.

*Brian Sandstrom*

**Brian Sandstrom**

Director  
May 2025

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- Moderna Biotech UK Limited
  - Moderna Biotech Manufacturing UK Ltd
  - Moderna Biotech Distributor UK Ltd
  - Moderna Manufacturing Canada Corporation
  - Moderna Australia Pty Ltd (ABN 65 650 204 872)
  - Moderna Manufacturing Australia Pty Ltd (ABN 27 657 936 206)

## Annex A:

### **Australian Modern Slavery Act 2018 (Cth) for the 2024 year.**

Moderna Australia Pty Ltd and Moderna Manufacturing Australia Pty Ltd are both companies which form part of the same corporate group, with ModernaTX, Inc. as the parent company. Neither company owns nor controls any other entities.

Moderna Australia Pty Ltd is the commercial entity for Australian operations. Moderna Manufacturing Australia Pty Ltd is the manufacturing entity for Australian operations. In the 2024 reporting period, the Moderna products being distributed in Australia in the reporting period were manufactured at Moderna's international manufacturing operations and then imported into Australia and sold by an international Moderna entity.

The Moderna Australia commercial operations are based in Melbourne, Victoria. Moderna Australia employed a total of 36 full-time equivalent (FTE) staff. These employees supported a broad range of functions including clinical trials, R&D resilience, pharmacovigilance, regulatory science, infectious disease development, and commercial operations. Additional functions covered include medical affairs, market access, marketing, finance, legal, human resources, talent acquisition, and quality assurance. The workforce included both regular and fixed-term employees, with fixed-term roles notably supporting the commercial and talent acquisition teams. Key suppliers in 2024 included Australian-based professional service vendors, alongside both global and local clinical and regulatory development support partners.

The Moderna Manufacturing Australia operations are based in Clayton, Victoria and employed approximately 98 FTE staff in 2024 who are establishing drug supply and drug product (fill and finish) capabilities, with all such employees supporting manufacturing activities. Key suppliers in 2024 for the manufacturing operations included construction and associated services from Australian based suppliers for building of the manufacturing facility, ModernaTX's Norwood manufacturing site in the U.S. which supplied key raw materials and additional U.S. based raw materials suppliers, U.S. and European based manufacturing equipment suppliers, lab quality control service providers based in Australia, Ireland and the U.S., and local and global suppliers of consumables used in manufacturing finished products.

All our local activities in Australia described above are governed by the same global policies and procedures referred to in this Statement. In 2024, we have not received any reports from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified, either at Moderna or in its local supply chains.

We recognize that as our Australian manufacturing scales up, potential risks might include sourcing raw materials or components or consumables from global suppliers in higher-risk countries. In 2024, our risk assessment did not identify significant local risks, given our



suppliers operate in low-risk jurisdictions and under strong regulations. However, we remain vigilant, especially with respect to any imported inputs or use of third-party labor. During 2024, Moderna Australia implemented the global due diligence program for its suppliers. Key suppliers completed our due diligence process, and high-risk suppliers (if any) were reviewed via our third-party screening process. We also ensured Australian employees (100%) underwent Code of Conduct and Human Rights training, which includes modern slavery components. Our Speak Up Hotline was available to Australian employees, contractors and third parties (including suppliers), but no reports of modern slavery were received.

We use the same key performance indicators in Australia as globally to assess effectiveness – for instance, monitoring any whistleblower reports or supplier non-compliances and tracking training completion. In 2024, none of our Australian operations had any reported incidents or findings of modern slavery. We continue to improve our oversight.

In preparing this Statement, no downstream consultation was required of the Australia reporting entities, as neither owns nor controls any other entities. In respect to the two Australian reporting entities, they have common international and local directors and a number of common functional support teams such as HR, Legal, Regulatory. Accordingly, the Australian reporting entities have produced this Statement working like one and under the direction of senior managers with an in-depth working knowledge of both entities and the broader Moderna global business. Upstream consultation has occurred with applicable teams such as Procurement, Supply Chain, ESG and Compliance.