



Human Rights Policy

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1. Purpose

At Affimed, we are a team of innate immunity experts working tirelessly to bring life-changing treatments to cancer patients around the world. We are committed to maintaining the highest ethical standards and to conducting operations in a manner that protects and supports all people involved.

We respect internationally recognized human rights and support the principles outlined in the United Nations Universal Declaration of Human Rights, United Nations Global Compact and International Labor Organization’s Core Labor Standards which are consistent with our values and business practices.

We are dedicated to operating as a strong corporate citizen conducting our daily business in alignment with the principles set forth in this Human Rights Policy (hereinafter the “Policy”).

2. Scope

This Policy applies to all Affimed and its affiliates’ Employees and members of the Management Board (hereinafter collectively, the “Employees”). We also expect our business partners to observe the principles set out in this Policy in accordance with our Code of Conduct for Business Partners.

3. Responsibilities

All Employees must be aware of their personal responsibility for protecting and supporting human rights. Moreover, all Employees are encouraged to proactively submit their suggestions for improvements to Affimed’s human rights practices or to report possible violations of the respective rules in accordance with our Speak Up Policy.

The SVP General Counsel & Compliance Officer is responsible for maintaining this Policy, and for investigating possible misconduct.

4. Abbreviations and Definitions

4.1 Abbreviations

EU GDPR	General Data Protection Regulation of the European Union
GCP	Good Clinical Practice
GLP	Good Laboratory Practice
GOP	Good Operating Practices
EHS	Environment, Health and Safety
UN	United Nations
ILO	International Labour Organization
EHS	Environment Health and Safety
HIPAA	Health Insurance Portability and Accountability Act

4.2 Definitions

Human Rights	Human rights are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. Human rights include the right to life
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	and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more. Everyone is entitled to these rights, without discrimination.
United Nations Universal Declaration of Human Rights	Is an international document adopted by the United Nations General Assembly that enshrines the rights and freedoms of all human beings.
United Nations Global Compact	United Nations Universal Declaration of Human Rights is a non-binding United Nations pact to encourage businesses and firms worldwide to adopt sustainable and socially responsible policies, and to report on their implementation. The UN Global Compact is a principle-based framework for businesses, stating ten principles in the areas of human rights, labor, the environment and anti-corruption.
International Labor Organization	The International Labor Organization is a United Nations agency whose mandate is to advance social and economic justice through setting international labor standards.
Labor Organization’s Core Labor Standards	The International Labor Standards are legal instruments, drawn up by the ILO constituents (governments, employers, and workers), that set out basic principles and rights at work.
UN Guiding Principles on Business and Human Rights	The UN Guiding Principles on Business and Human Rights is an instrument consisting of 31 principles implementing the United Nations' "Protect, Respect and Remedy" framework on the issue of human rights and transnational corporations and other business enterprises.

5. Our Commitment

Affirmed is committed to conducting business in an ethical and responsible manner. This includes respecting relevant internationally recognized human rights throughout our operations. We acknowledge that respecting human rights means evaluating the interests of various stakeholders and doing our best to mitigate any adverse impacts where human rights may be in conflict.

Human rights are fundamental rights and freedoms to which all people are entitled regardless of race, sex, nationality, ethnicity, language, religion, or any other status. We respect and support the protection of human rights, as set out in the United Nations’ Universal Declaration of Human Rights and UN Guiding Principles on Business and Human Rights and are committed to upholding the core labor standards stipulated by the International Labor Organization. We regularly track developments related to the International Labor Organization’s standards and local law and ensure their implementation into our business processes. Where there is potential for adverse impacts on vulnerable people or groups, we also respect other international standards and principles that elaborate on the rights of such individuals or groups, including indigenous peoples, women, national, ethnic, religious, and linguistic minorities, children, persons with disabilities, migrant workers and their families.

Furthermore, we are mindful of the important role of human rights defenders in respecting and promoting human rights and reject any threats, intimidation, and defamation against people defending human rights.

5.1. Health and Safety

Human rights start with health and safety. Protecting the health and safety of all who are affected by our business activities and protecting the environment are each core Company values that we consider alongside our other key business objectives.

While Affimed's management is responsible for implementing and maintaining good environmental, health and safety (EHS) practices and leading by example, all Employees need to understand EHS matters, and respond equivalently to them as they would to other key business objectives.

People have a right to healthcare, and to be treated with dignity and respect when they access it. Certain groups – including women and girls, those living in poverty, people with disabilities, migrants and displaced populations, and sexual and gender minorities, among others - are more likely to experience abuses and be exposed to harmful or degrading treatment and practices.

Although governments have the primary duty for protecting, fulfilling, and respecting peoples' right to healthcare, all stakeholders, including biotechnology companies, play a role in respecting people's human rights and dignity. We strive to avoid causing or contributing to human rights violations through our own activity and, to the extent possible, seek to use our influence to prevent or mitigate human rights violations directly linked to our operations, products or services through our business relationships. We are proud of how our science will contribute to the development and commercialization of groundbreaking treatments across multiple tumor types. With this science we aim to increase access to healthcare and change patients' lives.

Details on our environment, health and safety principles are set out in our EHS Policy.

5.2. Coerced Labor and Child Labor

Affimed does not engage in forced, compulsory, bonded or child labor. The absolute minimum age for employment is 18 years. Employment below this age is allowed only for trainees or apprentices whose work is part of a regulated training scheme.

All Employees have the option to leave employment within lawful contractual terms and the right to be provided with the proper documentation of their working relationship with Affimed. Accumulation of overtime and holiday entitlements is handled consistently with local law and procedures.

5.3. Diversity, Inclusion, Equal Opportunity, and Non-Discrimination

We encourage a diverse workforce. With the diversity of our Employees come unique ideas, viewpoints, talents and values that directly contribute to our success.

We work together with individuals of various ethnic backgrounds, cultures, religions, ages, disabilities, races, sexual identity, world view and gender. Equal treatment of all Employees is a fundamental principle of our corporate identity and we do not tolerate discrimination or harassment against anyone based on any of these characteristics or any other characteristics protected by law.

Rather, we expect all Employees to be respectful, professional, and fair in their dealings with colleagues, candidates in recruitment processes, and third parties, including customers, suppliers,

and public officials. Employment, evaluation, compensation, and promotion decisions are based solely on a person’s qualifications, merit, and performance.

5.4. Compensation and Working Conditions

We know that economic growth is only inclusive and sustainable when Employees receive fair wages. Making sure that Employees earn a living wage helps support economies and fosters growth. Affimed is committed to the right to fair and equal pay and provides working conditions that meet and exceed the standards set out in national and international labor laws, especially regarding compliance with the maximum permissible working hours and the granting of regular paid vacation.

Affimed strives to provide its Employees with wages and benefits that allow them and their families an adequate standard of living.

We respect the right to rest and leisure, including vacation with pay, and the right to family life, including parental leave and comparable provisions as applicable. Flexible work-time arrangements empower Employees to use opportunities to balance their employment with their personal or family lives.

We aim to foster a work environment where each of us can perform best, innovate, and develop. We encourage our Employees to fully utilize their potential by offering ample development opportunities and supporting a feedback culture throughout the enterprise.

5.5. Education

We believe in the development of internal talent and that the growth of human capital is essential for the success of our Company. We support the further development, education and training of all our Employees and create opportunities for advancement by empowering our Employees with the tools necessary to succeed in their roles.

5.6. Privacy

We respect the privacy rights of our Employees, patients, and other stakeholders and comply with the applicable laws and regulations, in particular the EU GDPR, HIPAA and other applicable privacy laws. We inform individuals of collection and processing of their personal data, allowing them to make informed decisions and exercise their rights. We collect and process personal data for specific and legitimate business purposes only and secure such data against unauthorized access. Details on Affimed’s rules on processing of personal data are set out in our Policy on Data Processing according to the GDPR.

5.7. Freedom of Association and Collective Bargaining

Affimed commit to constructive dialogue with workforce representatives, and to the involvement of work councils according to local laws and regulations. Affimed further respects each associate’s entitlement to freedom of opinion, expression, and speech, consistent with our Policies and standards of respectful behavior.

5.8. Security

Affimed ensures that it follows the applicable trade sanction laws, regulations, and boycott lists promulgated by all jurisdictions in which we do business. To safeguard this principle, we carry out an ongoing monitoring on our Business Partner.

5.9. Local Communities

Affimed respects the rights of local communities affected by our activities consistent with international human rights standards.

5.10. Clinical Trials

Affimed conducts high quality research and complies with international and national legal and regulatory requirements. Patient safety and data integrity are of paramount importance to us.

Clinical studies must comply with all relevant standards including Good Laboratory Practice (GLP), Good Clinical Practice (GCP) and other applicable Good Operating Practices, as well as national regulatory and legal requirements.

We strive for the highest possible protection of clinical study participants. Compromising patient benefit or safety is not an option. We discover, develop and manufacture high-quality products that meet all regulatory requirements, and pursue quality beyond compliance in both our products and processes. We protect patient safety by identifying, assessing, managing, and reporting any product-related risks in a timely manner and as required by applicable laws, regulations and our internal Policies.

5.11. Supply Chain

We expect our Business Partners (as defined in the Code of Conduct for Business Partners), especially suppliers and their subcontractors, to also observe the principles set out in this Policy.

5.12. Governance

Responsibility for implementing Affimed's commitments, as outlined in this Policy, is assumed at both a strategic and an operational level. The Affimed Management Board, overseen by the Supervisory Board, is responsible for the overall strategic direction of the business, and ultimately decides on Affimed's approach to and processes for respecting human rights. The entire Supervisory Board is updated by the Management Board in regular meetings about sustainability issues, including human rights.

Overall accountability for the implementation of this Policy, which is an integrated part of Affimed's Compliance Program, sits with Affimed's SVP General Counsel & Compliance Officer. The Compliance Committee oversees the development, maintenance, and monitoring of all Compliance Policies and activities related to the Company's business matters and required to execute the corporate strategy.

5.13 Reporting Concerns

At Affimed, everyone is encouraged to speak up and report concerns regarding non-compliance with this Human Rights Policy. Reports are treated in strict confidentiality and can be made in person or anonymously. Affimed does not tolerate retaliation against any Employee who reports concerns in good faith either internally, to any governmental agency or to any self-regulatory organization.

Affimed carefully investigates all reports of misconduct and may impose sanctions for non-compliance or take other actions where needed.

Please address any reports to:

Susanne Spieler
SVP General Counsel & Compliance Officer
Phone: + 49 621 56003 0
Mail: compliance@affimed.com

Polya Ivanova
Assistant General Counsel and Head of Environment, Health & Safety (EHS)
Phone: + 49 621 56003 0
Mail: compliance@affimed.com

Or use our anonymous [Integrity Line](#).

Details on Affimed's rules on reporting are set forth in our Speak-Up Policy.