MODERNA, INC.
SUMMARY OF TRADE COMPLIANCE

To ensure their citizens have reliable access to high-quality products and to protect intellectual property rights, countries have established international trade regulations. As a responsible corporate citizen, and to prevent product supply interruptions that could affect individuals’ health, Moderna is committed to meeting the regulatory requirements of all countries in which it operates, including international trade regulations.

Moderna’s Code of Business Conduct & Ethics requires all Moderna personnel to understand how international trade regulations apply to their work. As failure to meet these regulations may result in significant penalties for Moderna, a Trade Compliance department has been established.

Trade Compliance advises all Moderna personnel on compliance with import and export regulations, and implements procedures to provide checks and safeguards at key steps in our business processes to help prevent transactions that may be contrary to these regulations and against Moderna’s Code of Business Conduct & Ethics.