

Political Engagement and Disclosure

Our mission is to deliver on the promise of mRNA science to create a new generation of transformative medicines for patients. We engage directly with government officials and policymakers, as well as through trade associations and other advocacy organizations, to help ensure that public policy decisions and legislation are well informed and that they continue to promote innovation and our mission of delivering for patients.

At Moderna, our approach to political engagement is defined by the following principles:

1. We do not contribute corporate funds to political candidates, parties or committees for public office or to 527 groups (including political action committees, or PACs).
2. We do not make independent political expenditures in direct support of or in opposition to political campaigns.
3. We do not sponsor an employee political action committee, or PAC, and have no plans to do so.
4. We believe that membership in trade associations and contributions to advocacy organizations (specifically those organized under Section 501(c)(4) of the Internal Revenue Code) can help advance the biotechnology industry, promote a policy environment that continues to encourage innovation, and promote our mission of creating a new generation of transformative medicines for patients. To the extent that we contribute more than \$25,000 in any calendar year to a trade association or 501(c)(4), we will disclose the name of that organization and the dollar amount (or US dollar equivalent) of any membership dues or contributions that are ineligible for deduction as an “ordinary and necessary” business expense. Such disclosures will be made twice per year.
5. The Nominating and Corporate Governance Committee of the Board of Directors, which is comprised solely of independent directors, annually reviews our policy on political engagement and exercises oversight of Moderna’s political engagement, including our engagement with trade associations and other tax-exempt organizations that may engage in political activity.

Appendix

In 2020, Moderna, Inc. and its subsidiaries paid dues and made other payments in excess of \$25,000 to the following trade associations and 501(c)(4)s:

Organization	Non-Deductible Portion of Payments
Adult Vaccines Access Coalition (AVAC)	\$15,000
Biotechnology Innovation Organization (BIO)	\$33,861



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