

Effective Date: 15September 2021

Title:

CONFIDENTIALITY OF INFORMATION**1. PURPOSE**

The SIGA Confidentiality of Information Policy (the “Policy”) describes the standards of SIGA Technologies, Inc. and its worldwide subsidiaries (the “Company”) for all Covered Persons for protecting all company confidential information (“Covered Person” as used in this Policy, is defined below).

Please read this Policy and its appendices in their entirety. You will be required to certify that you have read, understood and agree to comply with this Policy by signing and returning the form of certificate attached hereto as **Appendix A**. If you have a specific question, you should contact the Company’s General Counsel (GC), Chief Financial Officer (CFO), or Corporate Compliance Officer (CCO), and abstain from the conduct in question until you have been informed that the proposed conduct is permissible.

In addition to the provisions set forth in this Policy, all Covered Persons must comply with all legal restrictions in connection to the use of material non-public information, especially regarding the trading of SIGA securities. Please refer to Policy 512, Securities Trading Policy, for a detailed description of the relationship between material non-public information and the trading of SIGA securities.

2. SCOPE

It is important to emphasize that all Covered Persons are subject to this Policy. “**Covered Persons**” are all employees, officers and members of the board of directors of the Company. Additionally, the following persons may also be deemed Covered Persons and be subject to the restrictions contained in this Policy: (i) employees of any of the Company’s subsidiaries, (ii) in some cases, individuals who are not employed by the Company but who are retained by the Company for a particular project or on a continuing basis who are consequently provided access to Company Confidential Information, and (iii) former, temporary or retired employees, executive officers, directors, and the persons and entities with whom they have relationships until the latter of one business day after the public release of earnings for the fiscal quarter in which employment ended or one business day after any confidential information known to the former employee, director or officer becomes public or is no longer confidential.

The Company recognizes that it might not be appropriate in certain cases for this Policy to extend to all such people. If a Covered Person believes that this Policy should not apply to a specific person or category of persons, the Covered Person should discuss the issue with the GC, CCO or the CFO before any action is taken that might violate this Policy.

As stated above, all Covered Persons must comply with all legal restrictions on the handling of material, non-public information. Please consult SIGA’s Securities Trading Policy to address any questions you may have regarding access and handling material nonpublic information and securities transactions. [See](#) Policy 512.

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3. RESPONSIBILITIES

3.1 *General Principle*

It is the duty of all Covered Persons to maintain the confidentiality of and not misuse any confidential or proprietary information belonging or relating to the Company, as well as confidential information relating to others and obtained through a confidential relationship with the Company (“Confidential Information”), and includes any non-public business information and other private, personal, confidential or proprietary information, including trade secrets concerning the Company, its products, intellectual property and operations, as well as its officers, directors, employees, shareholders, representatives, or agents, and their respective family members. This definition of Confidential Information explicitly includes any non-SIGA information inadvertently observed or overheard as a result of SIGA’s tenancy at the premises located at 31 East 62nd Street, New York, NY 10065.

Covered Persons may only share Confidential Information as appropriate for a legitimate and lawful business purpose consistent with the any restrictions associated with access to such information (for example, as set for in a relevant Non-Disclosure Agreement). No Covered Person shall, at any time, directly or indirectly, disclose, communicate or make known to any other entity or person (non-Covered Person), or make any other non-business use of any such Confidential Information. Violation of this Policy may lead to disciplinary action, up to and including termination of employment or other relationship with the Company.

3.2 *Kinds of Information Covered*

While Confidential Information may involve any aspect of the Company’s business, and can be shared and stored in a wide array of formats or settings, set forth below are examples of types of confidential information. This list is merely illustrative and is not exhaustive:

- (i) information related to possible transactions, including proposals, negotiations or agreements for possible acquisitions, mergers or joint ventures and dispositions of significant assets or existing operations;
- (ii) information related to potential changes in corporate structure, such as a change in management or control or other important management developments;
- (iii) information related to financial reporting, such as financial results, including earnings, earnings estimates or operating results; internal financial forecasts and budgets regarding sales, operating income, EBITDA, net income, earnings per share or cash flows and the like;
- (iv) information related to upcoming business development, such as the planned introduction of a significant new product, difficulties or delays in doing so or the abandonment of previously-announced plans to do so;
- (v) significant litigation developments, or disputes with customers, suppliers, contractors or others that may have a significant impact (whether favorable or unfavorable);

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- (vi) change in a significant contingent liability;
- (vii) significant shifts in operating or financial circumstances, such as: cash flow reductions; major write-offs; organizational restructurings; any event, such as a casualty, strike or lack of orders; or the proposed shutdown of any significant facility;
- (viii) significant new contracts or changes in existing contractual relationships or loss of business or shelf space (whether actual or potential);
- (ix) the possibility of a bank credit refinancing or issuances of public notes, or other refinancing, recapitalization or corporate reorganization;
- (x) the possibility of a public offering of securities, a rights offering, an exchange offer, stock splits or stock dividends, or private sales of securities;
- (xi) a planned or possible repurchase of the Company's securities until such repurchase has occurred or been made public;
- (xii) a governmental investigation;
- (xiii) a default or expected default under a loan agreement, indenture or significant contract;
- (xiv) changes in accounting methods which may significantly affect either reported earnings per share or debt levels or change the "quality" of earnings;
- (xv) substantial unhedged fluctuations in interest rates or the value of the currency of a country in which the Company conducts a major international business;
- (xvi) significant raw material shortages;
- (xvii) developments relating to the approval or commercialization of the Company's products, including, without limitation, any United States Food & Drug Administration or other governmental approval;
- (xviii) material cybersecurity incidents, or discovery of previously undisclosed cybersecurity vulnerabilities and/or risks; or
- (xix) any other event that would be expected to affect the value in the market of one or more classes of the Company's securities;
- (xx) nonpublic data entrusted to the Company by external parties including our Customers, Partners and Vendors.

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(xxi) personal information related to clinical trial subjects, employees, past employees, consultants, investigators, and any other individual whose personal information SIGA collects and uses in the course of its business.

3.3 Steps to Be Taken to Preserve Confidentiality

Covered Persons should use their best efforts to protect and preserve the confidentiality of Confidential Information. For example:

1. Do not discuss business or Company matters in elevators, hallways, restaurants, airplanes, taxicabs or any place where you can be overheard;
2. Do not carry documents in elevators, hallways, etc. in an exposed manner;
3. Do not read documents (including on your laptop) in public places or discard them where others can retrieve them;
4. Beware of the ability of others to hear conversations such as on speakerphones. Similarly, do not discuss confidential matters on cellular or airplane telephones or two-way radios because others may be able to eavesdrop;
5. Do not leave documents or laptops in unattended conference rooms or leave documents or laptops behind when you leave a meeting;
6. Cover confidential documents on your desk before you leave your office or room and do not leave confidential papers lying where visitors can see them;
7. Do not post or respond to any posting on or in internet message boards, chat rooms, discussion groups, or other publicly accessible forums or social media with information concerning the Company. Direct all inquiries about the Company to the GC or CFO;
8. Covered Persons are responsible for making sure the appropriate agreement is in place to protect confidential information prior to sending out any confidential information. Covered Persons are also responsible for marking confidential information either "confidential" or "proprietary" prior to sending out; and
9. Under no circumstances are employees or officers to provide confidential Company documents or email containing confidential information to third parties, without the express consent of their Supervisor and the CFO or the GC, and confirmation from the GC that the recipient has executed an appropriate confidentiality agreement. This includes, but is not limited to, any confidential Company documents relating to customers, competitors or suppliers of the Company.

This list is designed to highlight best practices, but not meant to cover every circumstance that may arise. It is the responsibility of each Covered Person to take whatever steps are appropriate to preserve the confidentiality of Confidential Information that they learn as a result of their association with the Company.

4. RESPONDING TO INQUIRIES FROM THE PRESS AND OTHERS

If someone outside the Company, such as the news media or a securities analyst or investor, asks you questions concerning any aspect of the Company's affairs, **you should not respond directly to the inquiry**. Consistent with the Company's Public Communications Policy ([Policy 515](#)), you should politely obtain the name of the person making the inquiry and immediately notify the

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Chief Executive Officer (CEO), General Counsel (GC) or Chief Financial Officer (CFO). Consistent with the Public Communications Policy, a Company spokesperson or the Lead Independent Director may be designated to address these inquiries in order to assure appropriate and consistent responses. If you have any question regarding this requirement, you should contact the CEO, GC or CFO for clarification.

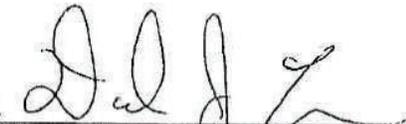
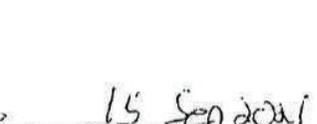
4.1 Requests from the press

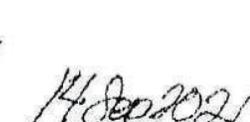
Requests from the press and other media outlets about our products, marketing, philanthropic efforts and the like must be immediately referred to the GC.

4.2 Requests from others including government or regulatory agencies

Requests for information generally or other contacts from any government or regulatory body (U.S. or non-U.S.) must be immediately referred to the GC. If the agent or representative asks you to provide information, or copies of any data or documents relating to any transactions or other activities of the Company, you must inform the agency representative that you are not authorized to provide such materials, but that an authorized Company representative will respond to their request, and refer the agent to the GC. You are not permitted to respond to a request for Company information or documents without specific consultation with, and direction by, the GC. Similarly, if you receive any form of subpoena, a Civil Investigative Demand, or other form of legal process, you must promptly inform the GC. You must not take any other action until further advised by the GC.

5. APPROVALS

		
Robin Abrams	Date	Date
Initiator/General Counsel and Chief Administrative Officer		15 Sep 2021
	Daniel Luckshire	
	EVP and Chief Financial Officer	

		
Tove C. Bolken	Date	Date
Chief Supply Chain Officer & Corporate Compliance Officer		14 Sep 2021
	Annie Offutt	
	Director, Human Resources	

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Appendix A: Certification

I certify to SIGA Technologies, Inc. that:

- 1) I have read and I understand the Policy on Confidentiality of Information;
- 2) I agree to comply with the Policy, including any amendments of which I receive notice at any time or from time to time during the duration of my employment or other relationship with the Company;
- 3) I am in compliance with the Policy; and
- 4) I understand that any violation of this Policy by me, my family members or any other persons or entities who are subject to this Policy because of their relationships with me may subject me to severe civil or criminal penalties and may also result in disciplinary action against me, including the termination of my employment or other relationship with the Company and its subsidiaries, at the option of the Company.

Signature: _____

Print Name: _____

Date: _____