

## INTRODUCTION

All of us at SIGA Technologies, Inc. (hereinafter “SIGA” or “the Company”) have important roles to play in upholding the Company’s commitment to conduct business-related activities in a legal and ethical manner. Maintaining the highest levels of legal and ethical compliance is the right thing to do and will maximize the long-term success of the Company, in addition to fostering a culture that we value. The purpose of this Code of Ethics and Business Conduct is to set forth the Company’s expectations in this regard and promote a commitment to honesty, integrity and respect for law and the colleagues with whom we work. This policy applies to SIGA Technologies, Inc. and its subsidiaries (which this Code collectively calls the “the Company”). References in this Code to “employees” also include non-employee officers and members of the Board of Directors.

We expect each employee to use sound judgment to help maintain appropriate compliance procedures and to carry out business activities legally and ethically. No Code can address all of the issues that its personnel may face, so please apply this Code with common sense. If you are not sure what to do, ask your Manager, Human Resources, the Company’s Corporate Compliance Officer or the General Counsel. Each employee of the Company must read and be familiar with this Code and demonstrate a personal commitment to its standards.

Our officers and other supervising employees must be leaders and role models in demonstrating this personal commitment to the standards outlined in this Code. They must also seek to ensure that the employees they supervise adhere to its standards.

An employee who does not comply with this Code may be subject to disciplinary actions up to and including termination of employment where appropriate.

The Code of Ethics and Business Conduct is not a contract. It is not intended to and does not create an employment contract, does not create any contractual right between the Company and its employees, does not alter or amend any existing or future contractual relationship between the Company and any employee and does not create any express or implied promise for specific treatment in any specific situation. Further, is not intended as a detailed guide for all situations you may face or to detract from the importance of applicable laws and regulations not detailed herein. Additionally, this code can be amended at any time and without notice.

## THE RULES THAT GUIDE OUR BUSINESS

### I. OUR COMMITMENT TO OUR STOCKHOLDERS

We expect you to share a commitment to protect our assets and manage our business in the best interests of our stockholders.

- Accuracy of our records and reporting. All employees must accurately record financial and other business information pertaining to the Company. All financial records and transactions must adhere to our system of internal controls and accounting requirements, and no one shall enter any false or artificial information in our records or reporting systems. Every record must be truthful and complete. These requirements apply to all

Company information, including personnel, workplace and safety records and information we release to the public or file with governmental agencies.

- Disclosure Controls and Procedures. SIGA is committed to full and transparent financial reporting consistent with the highest industry standards. As a public company, SIGA is subject to periodic reporting obligations set forth by the U.S. Securities and Exchange Commission (“SEC”). The underlying basis of the reporting requirements is to keep shareholders and the markets informed on a regular basis in a clear and transparent manner. Reports filed with the SEC can be viewed by the public on the SEC EDGAR or SIGA website. The required reports include an annual Form 10-K, quarterly Form 10-Qs and periodic Form 8-Ks as well as proxy reports, among other reporting requirements. All employees must, within the scope of their employment duties, support the effectiveness of our disclosure controls and procedures and comply with disclosure requirements in accordance with applicable laws and regulations.
- Securities Trading Policy and Handling of Confidential Information. The Company’s POL-27 Policy 512 - Securities Trading Policy prohibits any employee from buying or selling stock or other securities of the Company, its affiliates, or any third parties with whom SIGA has or is contemplating having a business relationship with using “material” non-public information concerning the Company or concerning those third parties (until after the material information has been fully disclosed to the public). As the Policy explains in more detail, “material” information is any information that a shareholder would consider important when deciding whether to buy, sell or hold SIGA or the third parties’ stock. Employees must also not disclose or “tip” any of this material non-public information to family, friends or others outside the Company. It is a federal crime to make securities trades or enable others to make securities trades based on this insider information. These practices are sometimes called “insider trading.” The insider trading rules can be quite complex. If you have any questions or need more information, please refer to the Company’s Securities Trading Policy or contact the Chief Financial Officer or General Counsel.
  - No Selective Disclosure. In addition, applicable securities rules also prohibit selective disclosure of material non-public information to those outside the Company in most circumstances. Therefore, all employees must assist the Company in keeping all material non-public information about the Company strictly confidential unless and until the Company makes an authorized press release or other authorized public communication or filing.
  - Information to the Public. Our policy is to provide public dissemination of material information about the Company’s business only through employees authorized for this purpose. You may not under any circumstance discuss the Company’s financial, business or other information with the press (except if the Company has expressly authorized you to do so for this purpose), on social media, or on any Internet or other “discussion board,” “chat room,” or similar forum. This applies to any outside speaking engagements you may have as well. If you receive a request from the media, an analyst or a stockholder about the Company, you must forward it to the Chief Executive Officer, the Chief Financial Officer, the General Counsel, Chief Medical Officer or the Corporate Compliance Officer.

- Social Media. The Company believes in sharing relevant business information through a variety of social media forums including SIGA's website, LinkedIn page, Twitter and other appropriate platforms. To that end, please reference, POL-23 Policy 446 - Materials Review Policy for SIGA Website and Other Public Content Forums, pursuant to which the Company has established a process to propose, review and post such information. With respect to personal social media accounts, Employees are expected to exercise good judgement and must never disclose confidential information regarding the Company or any of its employees, subsidiaries, or affiliates on personal social media accounts. Please reference the Company's POL-26 Policy 463 - Social Networking Policy for further guidance on expectations.
- Protection of Company Assets. You are personally responsible for using the Company's assets only for lawful, corporate purposes approved by management. In accordance with the Company's policy, POL-8 Policy 16 - Use of Information Technology Resources Policy, all employees should help the Company protect its assets from misuse, theft, damage or other loss. Employees are expected to act with appropriate decorum and never exchange communications involving illegal, discriminatory, sexually explicit, or other offensive material. The Company respects the privacy of all employees. There are times when it is necessary to monitor or disclose information regarding an employee's communication or conduct, for example, in response to a lawful subpoena or to investigate misconduct or violations of this Code or other Company policies. The Company reserves the right to monitor, record, and disclose your communications and conduct while using Company assets or on the premises when authorized by the Chief Executive Officer, the Chief Financial Officer or the General Counsel because it is deemed necessary, in their discretion, and it is permitted by law. If you notice anything unusual or discover a security breach of any kind, you must report it immediately to the General Counsel, the Chief Information Officer, the Corporate Compliance Officer or your Manager.
- Intellectual Property. The Company considers its "intellectual property" - including its inventions, processes, patents, trademarks, licenses, customer lists and trade secrets - to be valuable assets. In accordance with POL-27 Policy 512 - Securities Trading Policy: Confidentiality of Information and Securities Trading and, as applicable, any employment agreement or contract with the Company, employees must maintain the value of the Company's intellectual property by using care to keep the Company's trade secrets and other non-public information confidential, and restricting access to non-public information to those authorized to use it in their duties in connection with the Company's business. If customers or suppliers provide non-public information to us in their dealings with us, we must protect that information in the same manner as the Company's property.
- Communications. You must use appropriate judgment and discretion in your email, memos, notes and other formal and informal oral and written communications relating to the Company's business. Communications relating to the business must avoid abusive, inappropriate, derogatory or harassing comments about other individuals or companies, unprofessional language and unauthorized financial, legal or business statements.

- Retention of Records. In accordance with POL-32 Policy 672 - Business Document Retention Policy, Company records for which you are responsible must be preserved in a manner consistent with the business needs of the Company and legal, regulatory and policy requirements. You must familiarize yourself with retention rules applicable to categories of documents (e.g., personnel files, tax records) for which you are responsible. You may never destroy or alter records or documents (whether in paper form, emails or otherwise) in response to or in anticipation of any legal proceeding or governmental inquiry or investigation. You may subject yourself to criminal or other liability, and create potential legal exposure for the Company, if you:
  - corruptly alter, destroy, mutilate or conceal a record, document or other object, or attempt to do so, with the intent to impair its availability for use in an official proceeding, or
  - knowingly alter, cover up, falsify or make a false entry in any record, document or tangible object with the intent to impede or obstruct the investigation or administration of any matter by a governmental agency or bankruptcy court.
- Hybrid Schedule and Remote Work. The Company may offer a hybrid work schedule for specific roles within SIGA. SIGA's IT Department will provide support and appropriate equipment for employees to use while telecommuting or working remotely in accordance with individual job responsibilities and circumstances. Consistent with SIGA's expectations of information security for employees working in the office, employees working outside of SIGA's physical offices are still expected to safeguard and ensure the protection of proprietary company and customer information accessible from their remote location. This is true regardless of whether there is a temporary or extended period in which employees are working from remote locations. Temporary or permanent adjustments to remote work locations (domestic or international) must be submitted in advance to Human Resources and IT for review and approval.

## II. OUR COMMITMENT TO CUSTOMERS AND BUSINESS PARTNERS

We are committed to excellence in service and performance for our customers, and building mutually advantageous alliances with our business partners.

- Customer Relationships. The Company's policy is to build lasting relationships with our customers through superior delivery and execution, and honest sales and marketing. We will comply with applicable advertising laws and standards. The Company policy also prohibits making false or deceptive statements about our competitors, and giving or accepting kickbacks, bribes, inappropriate gifts and other benefits prohibited under the conflict of interest topic in this Code.
- Protecting Information about Others. We are committed to treating confidential information belonging or relating to our customers and business partners with the same standard of care we use to protect our own proprietary or confidential information. All employees are expected to use sound judgment in limiting access to confidential information about our customers and business partners. Confidential information

belonging to others should only be shared with SIGA employees, authorized representatives, consultants or affiliates who are actively and directly involved in the project or business evaluation and need to know this information to carry out their jobs.

- Data Privacy. The Company recognizes the importance of data protection and privacy. To that end, SIGA complies with all relevant data protection and privacy laws and regulations and is committed to taking reasonable steps to safeguard personal identifying information of its employees, customers, and others. Please reference POL-48 Policy 840 - Privacy Policy for additional information. To the extent that you have any concern about data privacy, or become aware of an actual or potential data breach, please contact the Corporate Compliance Officer, Chief Information Officer, or Human Resources.
- Commitment to Quality. Our long-term reputation and business success depend upon our continued maintenance of high quality and best practices in the products and services we provide. We are committed to deliver our products and services only in accordance with the documentation, safety, quality control and other procedures we maintain and update from time to time as well as relevant federal, state and local regulatory standards.
- Special Concerns with Governmental Customers. Special legal and contracting rules may apply to our dealings with domestic and foreign governmental agencies. Many national, state or other governmental agencies impose bidding, procurement or compliance requirements, special billing and accounting rules, or restrictions on the subcontractors or agents we may engage. Domestic or foreign laws or regulations may also impose strict limits on any kind of benefit or gift that may be offered to officials, including limitations on hiring former government officials or their family members. If you deal with domestic or foreign governmental agencies, you must be familiar with the laws and regulations applicable to these business activities and use sound judgment to avoid any violation of the letter or spirit of the laws prohibiting corrupt practices in connection with governmental contracting. Some of the special rules that apply to contracts with the U.S. federal government are discussed in Section VII.
- Suppliers. We base our contracts with suppliers of products and services on the best interests of the Company and its business. These contracts must reflect a fair market price for the deliverables provided to us and be recorded in accordance with appropriate approval, contracting and internal control procedures.
- Business with Third Parties. We expect our consultants, agents, resellers, distributors, subcontractors and other business partners to adhere to lawful and ethical business practices. It is essential to the Company's reputation that we avoid doing business with companies that violate applicable laws or have reputations that could harm our business. The Company's policy prohibits engaging agents or other third parties to do indirectly what we as a Company should not do directly under our own policies.

### III. OUR COMMITMENT TO EACH OTHER

Each employee must do his or her part to promote a positive working environment for all.

- Respect for Our Employees. The Company's employment decisions will be based on sound reasons related to the business, such as job performance, individual skills and talents, and other business-related factors. The Company policy requires adherence to all national, state and local employment laws. The Company policy prohibits discrimination in any aspect of employment based on race (including hairstyle/texture), color, religion, sex, gender identity or expression, sexual orientation, marital status, citizenship, national origin, genetic information, veteran's status, unemployment status, disability, age, or any other characteristics protected by applicable federal, state or local laws.
- Abusive or Harassing Conduct Prohibited. The Company policy prohibits abusive or harassing conduct by our employees toward others, such as unwelcome sexual advances, comments based on ethnic, religious or racial background or beliefs, or other non-business, personal comments or conduct that make others uncomfortable in their employment with us. The Company's policy is to provide our employees with a respectful and pleasant work environment free from harassment, sexual or otherwise, and to prevent harmful exploitation of authority and to promote an equal opportunity organization. We encourage employees to report harassment or other inappropriate conduct as soon as it occurs. We are committed to taking prompt and appropriate action as soon as we are aware of or receive any credible report of harassment or inappropriate conduct of any kind, and we will neither take nor permit any retaliatory action against an employee who reports a concern in good faith.

Harassment of any kind impinges upon a person's dignity, privacy and sense of equality, makes the work relationship more difficult and contradicts the Company's policy. Sexual harassment in particular may include (a) any differential treatment because of an employee's gender or gender identity; and (b) unwelcome sexual advances, requests for sexual favors, and any other verbal, non-verbal, or physical conduct of a sexual nature that has the effect of unreasonably interfering with an employee's work performance or which creates a hostile, offensive, or intimidating work environment for a reasonable individual. Therefore, no employee may, among other things, threaten or insinuate, either explicitly or implicitly, that another employee's refusal to submit to sexual advances will adversely affect any condition of employment; engage in verbal abuse of a sexual nature; use sexually degrading or graphic words to describe an individual or an individual's body; or display sexually suggestive objects or pictures in the workplace. In addition to harm caused to the work environment, sexual harassment can be a criminal offense.

Employees must adhere to the Company's policy in this matter and the prevailing laws and regulations. Employees may report claims of harassment or other inappropriate conduct directly to Human Resources, the General Counsel, the Corporate Compliance Officer, or through EthicsPoint ([siga.ethicspoint.com](http://siga.ethicspoint.com)). Such reports may be made anonymously. For further information, please see section IX "How to Report your Concerns" below.

- Health and Safety. All employees must help us to maintain a healthy, hygienic and safe working environment and to promptly report any unsafe or hazardous condition or material, injury or accident connected with the business. The Company is committed to adhering to safety laws and regulations, including fire protection and other building regulations, and



laws and regulations that promote cleanliness and hygiene in the workplace. The Company complies with the Drug-Free Workplace Act and illegal substances are forbidden in the workplace. Additionally, you may not work under the influence of any substance that would impair your safety or the safety of others or impact your ability to perform your job. Upon reasonable suspicion, the Company reserves the right to conduct a drug test for illegal substances. The Company is committed to maintaining a violence-free workplace. Any threats or acts of any level of violence or intimidation are strictly prohibited and will not be tolerated. We encourage all employees to report concerns of Health and Safety to their Manager, Human Resources, the General Counsel, the Corporate Compliance Officer, or EthicsPoint. In the event of an emergency, you should first call 911.

#### IV. LEGAL COMPLIANCE GENERALLY

We expect our employees to be committed to pro-active compliance with all applicable laws and regulations affecting the Company and its business. In addition to the laws discussed elsewhere in this Code:

- General Standard of Compliance. You must comply with all applicable laws and regulations and national and local governmental authority rules, regulations and procedures in every location in which we conduct business. Competitive factors, personal goals, and pressure from Managers, customers or others shall never be an acceptable excuse for violating the law.
- Prohibited Corrupt Practices. Our Company must comply with anti-corruption laws, including the Foreign Corrupt Practices Act ("FCPA"), that apply in the places where we do business. Our employees and agents must not directly or indirectly offer, promise, authorize, give or attempt to give anything of value to any person in order to obtain or retain business, obtain any improper advantage, influence the recipient to act in favor of SIGA, induce the recipient to perform his or her job functions in favor of SIGA, or thank the recipient for improperly directing business or giving a business advantage to SIGA. Please reference our Company's POL-34 Policy 700 - Anti-Corruption Policy for further guidance and expectations.
- Anti-Fraud. Just as our business records must be honest and accurate, we must be honest and accurate in our dealings with one another, the marketplace, the government, and anybody else with whom we interact. You may not engage in any form of fraud, including, but not limited to, misrepresentation of facts or concealing the truth by omitting important information, bribery, embezzlement, theft, hiding or misuse of Company assets or falsification of records. We will not tolerate any form of fraud or dishonesty. Such misconduct may result in severe consequences up to and including termination of employment.
- Anti-Money Laundering. Money laundering involves engaging in conduct to conceal or improperly record illegal compensation. You may not facilitate or engage in money laundering in any way and we may have an obligation to report transactions that are suspicious or unusual. "Red flags" that may be indicative of money laundering include payments structured in a way inconsistent with company practice or coming from an

unknown or unassociated account, overpayments, large payments in cash and payments made in unexpected currencies.

- Prohibited Political Contributions. Political activity represents another area where the rules on permissible activities are complex and you could inadvertently run afoul of such rules. Please reference our Company's POL-34 Policy 700 - Anti-Corruption Policy for further guidance and expectations. As a result, you may not contribute in the Company's name or on the Company's behalf anything of value, including cash, services or property of any kind, for or in support of any political party, candidate, committee, initiative or activity without prior express written approval from the General Counsel.
- Prohibited Loans to Executive Officers and Directors. It is unlawful for the Company, directly or indirectly, to extend or maintain credit, to arrange for the extension of credit, or to renew an extension of credit, in the form of a personal loan to or for any director or executive officer of the Company.
- Import and Export Restrictions. The Company and its employees must comply with all applicable restrictions under domestic and foreign laws relating to importing or exporting technology, products, services or regulated information. Employees who conduct Company business involving foreign countries must be familiar with and abide by applicable import/export and similar restrictions. Please reference our Company's POL-30 Policy 516 - U.S. Export Controls Compliance Policy for further guidance and expectations.
- Environmental Laws. The Company is committed to protecting the environment. We respect the policies and requirements of domestic and foreign laws aimed at protecting the environment. We expect a commitment from our employees to report appropriately any violation of environmental laws and any exposure to hazardous materials or substances where it appears that such substances may not be being handled or disposed of properly. The Company is committed to adhering to policies which reasonably support protecting the environment in the conduct of its office and its business.

## V. COMPETITION

We are committed to competing effectively, but lawfully, in our business markets.

- Compliance with Antitrust Laws. The Company and its employees must comply with the antitrust and unfair competition laws of the countries in which the Company engages in business. These laws vary by country and can be complex. If you have a role that may implicate the antitrust laws – such as a sales and marketing or business development executive position – you are responsible for knowing the laws that apply to these business activities, and should speak to the General Counsel if any question arises. Generally, these laws prohibit or regulate certain mergers and acquisitions, attempts to monopolize or otherwise restrain trade, selling products below cost, price discrimination, price fixing or other agreements with competitors that would divide or allocate customers or could otherwise harm customers, certain kinds of “tying” arrangements that require a customer who wishes to buy a given product to buy other products or services, artificially maintaining prices, and certain other restrictive agreements or arrangements. Our



employees may not exchange non-public sales information with competitors for the purpose of affecting sales prices or inventory levels.

- Fair Methods of Competition. The Company is committed to competition on a lawful and ethical basis. You may not use improper or illegal means of gaining competitive information that is confidential or proprietary information owned by others. You may not use or disclose confidential or proprietary information that you may have from past employment with other employers.

## VI. CONFLICTS OF INTEREST

In accordance with POL-33 Policy 699 - Conflict of Interest Policy, we expect all of our employees to avoid allowing their private interests to interfere, or appear to interfere, with the interests of the Company as a whole.

- Generally. You must make or participate in business decisions and actions in the course of your employment with us based on the financial interests of the Company as a whole, and not based on personal relationships or benefits. Although this Code contains some general guidelines, you must apply sound judgment to avoid conflicts of interest that could negatively affect the Company or its business, whether or not we have specific rules for that particular situation. You must disclose to us any situation that may involve inappropriate or improper conflicts of interest affecting you personally or affecting other employees or those with whom we do business, as described under "How to Report Your Concerns."
- Business Referrals. You may not personally attempt to give or steer Company's business to individuals or entities in which you, a family relative or personal friend has a financial or other interest unless you have first advised Human Resources and the General Counsel of the proposed transaction and relationship. Based upon the information provided, Human Resources and the General Counsel may, in their discretion, submit the request to the Company's Chief Executive Officer, Chief Financial Officer or Chief Scientific Officer for approval.
- Personal Investments. Generally, you must avoid investments in other companies with which the Company does business if these investments could create the fact or appearance of a conflict of interest, unless such investments received the appropriate Company approvals after full disclosure of the relevant circumstances. Investing in relatively small positions in publicly-traded securities of other companies is generally not prohibited so long as there is no violation of the Company policy relating to trading while in possession of material non-public information about other companies. You must notify the General Counsel or Chief Financial Officer in advance of any proposed personal investment you wish to make in other companies with which our Company does business or competes. The General Counsel or Chief Financial Officer shall advise on the appropriate approvals, if any, required in such circumstances.
- Corporate Opportunities. You must refrain from purchasing property or otherwise taking for yourself personally a SIGA-related business opportunity which you learn of through your

employment consistent with your individual terms of employment unless you have first advised Human Resources or the General Counsel of the proposed transaction and relationship. Based upon the information provided, Human Resources or the General Counsel may, in their discretion, submit the request to the Company's Chief Executive Officer, Chief Financial Officer or Chief Scientific Officer for approval. You may not use proprietary Company information for personal gain.

- Prohibited Competition. You may not compete with the Company during the term of your employment or thereafter consistent with your individual terms of employment and may not initiate any step to compete with the Company while still employed at SIGA.
- Outside Compensation and Activities. While employed by SIGA, you may not work for or seek or accept personal payments from any customer, supplier, competitor, distributor, reseller or other business partner of the Company unless you have first advised and had evaluated for potential conflict of interest by Human Resources or the General Counsel the proposed transaction and relationship. Based upon the information provided, Human Resources or the General Counsel may, in their discretion, submit the request to the Company's Chief Executive Officer, Chief Financial Officer or Chief Scientific Officer for approval. You may not use trade secrets or other non-public know-how or information learned at the Company inappropriately in activities outside the Company or in other ways that could harm SIGA's business. Nothing here is intended to restrict participation in non-compensated professional development opportunities or community service activities.
- Outside Board Service. You must obtain prior written authorization from the General Counsel for service as a director, general partner, manager, officer or similar position with any privately held or public business entity or as an appointee to any kind of governmental or quasi-governmental agency or body. Service solely as a director or trustee of nonprofit corporations engaged in charitable activities does not require approval unless that activity could involve actual or appearance of an improper conflict of interest.
- Gifts and Gratuities. You may not seek, accept or provide inappropriate gifts or gratuities in the form of anything of value, including services, cash or other items from or to SIGA's customers, business partners, regulatory authorities or other parties with whom the Company conducts business. You may never offer or provide anything of value with the expectation of favorable treatment and you may not offer or provide anything of value that could be or appear to be a bribe or otherwise illegal payment. The provision and acceptance of all gifts and gratuities, whether to government or non-government personnel, is subject to compliance with SIGA POL-34 Policy 700 - Anti-Corruption Policy.
- Business Entertainment. You must adhere to this Code and Company policies as in effect and updated from time to time with respect to costs of entertainment. Extending or accepting invitations to reasonable meals, public events and similar business activities incurred for bona fide business purposes is generally acceptable, assuming the costs are not disproportionate to the business purpose and otherwise do not create an actual or appearance of a conflict of interest. But, with respect to all business entertainment provided to government officials, you must obtain prior approval from SIGA's General Counsel. Further, you may not provide any meals to any U.S. government official. Meals

with U.S. government officials in the course of business are only permissible if the government official pays for their share of the meal, and where possible, such meals should take place on Company premises. You should not attend business entertainment events that may appear contrary to professional standards of conduct as outlined in this Code and other Company policies.

- Travel. You must comply with Company travel policies as in effect and updated from time to time. All travel-related expenses must actually be incurred, accurately reported and recorded in compliance with these policies. Please reference POL-20 272 - Travel and Expense Reimbursement Policy for additional information.
- Workplace Relationships. Employee off-duty conduct is generally regarded as private, as long as such conduct does not interfere with an employee's ability to conduct him or herself appropriately in the workplace. During working time and in working areas, employees are expected to conduct themselves in an appropriate manner that does not interfere with others or with overall productivity. Any employee making employment decisions or serving in a management or sensitive or influential position, must disclose to Human Resources or the General Counsel any potential or actual conflicts of interest relating to personal relationships in the workplace. An employee who is involved in a personal relationship with another employee may not work directly for or supervise the employee with whom they are involved. The Company reserves the right to take action if an actual or potential conflict of interest arises concerning individuals who engage in a personal relationship that may affect terms and conditions or employment including but not limited to reassignment or termination of employment of one or both of the affected employees.
- Other Corporate Policies. In addition to the above, employees must comply with all other Company policies in effect from time to time.

## VII. SPECIAL RULES APPLICABLE TO CONTRACTING WITH THE U.S. GOVERNMENT

- Procurement Integrity Obligations. The Procurement Integrity Act prohibits competing contractors and their employees and agents from obtaining, receiving, or soliciting Government source selection information or bid or proposal information of other competing contractors.
  - Government source selection information includes:
    - bid and proposal prices;
    - source selection plans;
    - technical or cost evaluations of proposals;
    - rankings of bids, proposals or competitors; and
    - reports and evaluations of source selection panels, boards or officials.
  - Contractor bid or proposal information includes:
    - cost or pricing data;
    - indirect costs and direct labor rates;

- proprietary information about manufacturing processes, operations, or techniques marked by the contractor in accordance with applicable law or regulation;
- information marked by the contractor as “contractor bid or proposal information” in accordance with applicable law or regulation; and
- information marked in accordance with proposal submission requirements set forth in applicable regulations.

Company employees must refuse any offers to provide the Company with any unauthorized contractor bid and proposal information, Government source selection information or proprietary information, and must report any such offers immediately to their Manager, or as otherwise provided in this policy. The Company employees may not use, obtain, accept or receive any information to which the Company is not clearly and legitimately entitled. Any Company employee who reasonably believes that the release or receipt of any information is unauthorized (whether marked or not) must not copy, distribute or use it until guidance has been obtained from the General Counsel.

- Hiring Government Employees and the “Revolving Door”. Because present and former Government employees and military personnel may be privy to Government source selection information or contractor bid or proposal information, hiring them may violate the Procurement Integrity Act and can create an insurmountable conflict of interest. In fact, even entering into discussions with present and recent former Government employees and military personnel may be a violation of the Procurement Integrity Act. Among other things, the rules prohibit a contractor from offering employment or other business opportunities or even discussing post-Government employment or business opportunities with Government procurement officials who are participating in procurement where the contractor is a bidder or offeror.

It is Company policy that all employees must obtain proper approval prior to any communication of any kind (whether initiated by the Company or by the other party, including via social media messaging or incident to an already scheduled non-employment related meeting), discussing possible employment, interviewing, negotiating with or making any offer of employment or any other sort of business opportunity to a present or recent former Government employee or military personnel. You must first notify the General Counsel or Corporate Compliance Officer of the proposed engagement or hiring, providing all of the pertinent details. The General Counsel or the Corporate Compliance Officer may choose to discuss the potential engagement or hiring with the Human Resources Director, and will determine if employment or retention is possible in light of the various regulatory restrictions.

There can be no discussions with current or recent former Government employees or military personnel until the General Counsel or Corporate Compliance Officer has provided approval in writing for such discussions. Only after you receive approval may you begin any discussions or negotiations regarding employment and then only within the limits set by the General Counsel or Corporate Compliance Officer.

- Organizational Conflict of Interest (“OCI”). The contracts or subcontracts for services or supplies that the Company provides to the Government may also require that the Company

comply with regulations regarding OCIs. In accordance with SIGA POL-33 Policy 699 – Conflict of Interest Policy, the Company will review all Government-related solicitations for contracts and subcontracts that the Company may be pursuing to identify all potential OCIs. As part of this review, all Company employees are expected to alert their management if they believe they have information (whether gained while employed at the Company or as a result of employment with other companies or the Government) that could create an OCI. All such potential OCIs must be adequately neutralized or mitigated through an appropriate OCI Mitigation Plan that may need to be submitted to the authorized customer representative for approval. All Company employees who may be covered by or subject to an OCI Mitigation Plan must be provided a copy of the Plan and agree to comply fully with its terms and conditions.

## VIII. OUR COMMUNITIES

We respect and support our employees' involvement in the community, charitable and political activities or causes they may choose to support, so long as these activities do not interfere with their job responsibilities. You may not represent that your views or activities speak for the Company. You may not engage in any unwanted solicitation or pressure toward other employees relating to charitable, religious or political causes that you may favor.

## IX. HOW TO REPORT YOUR CONCERNS

Where to Direct Questions. If you have questions about this Code or concerns about any of the matters listed here, please first consider speaking with your Manager if that person was not involved in the matter giving rise to your questions. If you do not wish to communicate with that person on the matter, please feel free to contact any of the following: Annie Offutt, Human Resources Director, Tove' Bolken, who serves as our Corporate Compliance Officer, General Counsel, or any other member of our management team. If you wish to communicate any matter anonymously, you are free to do so at [siga.ethicspoint.com](http://siga.ethicspoint.com) (although we encourage you to identify yourself in case we need to follow up on any aspect of your report with you), and we will maintain the confidentiality of your communication to the extent reasonably possible under the circumstances. You may send communications intended to be confidential to the Company's address, Attention: General Counsel or if the issue involves management improprieties or concerns, then such communication may be sent to the Company's corporate address, Attention: Chair of the Audit Committee marked "Confidential—Only to be Opened by Addressee" or sent electronically to such individual through the form provided on the Company's website (<https://investor.siga.com/investors/governance/contact-the-audit-committee/default.aspx>).

- Non-Retaliation Policy and Good Faith Concerns Are Protected. We encourage each of our employees to report any concern regarding possible illegal or unethical conduct relating to the business. We do not discriminate, retaliate or permit discrimination or retaliation against any employee who reports in good faith a concern to us. In addition, Company policy prohibits the discharge of, other adverse employment action in any manner against, or threat to or harassment of an employee for any lawful, good faith act by the employee to provide information or assist in an investigation by us or any governmental authority or

agency, of violations of applicable laws. In addition, employees may not be terminated, demoted, or otherwise discriminated against or subject to adverse employment action as a reprisal for disclosing to a person or government body information that the employee reasonably believes is evidence of gross mismanagement of a Federal contract or grant, a gross waste of Federal funds, an abuse of authority relating to a Federal contract or grant, a substantial and specific danger to public health or safety, or a violation of law, rule, or regulation related to a Federal contract (including the competition for or negotiation of a contract) or grant.

- False Claims Are Prohibited. It is a violation of this Code and our standards and expectations for any employee to make a report claiming illegal or unethical conduct that the employee knows or reasonably believes to be false.
- Audit Committee Available to Hear About Accounting Matters. In addition to the above, if you have concerns about accounting, internal accounting controls or auditing matters relating to the Company, you are also free to contact the Chair of the Audit Committee of our board of directors directly. Inquiries or communications intended to be anonymous should be mailed in writing to the Company's corporate address without indicating your name or address to the Chair of the Audit Committee and marked as "Confidential—Only to be Opened by Addressee", as noted in the first paragraph of this section. Alternatively, the Chair of the Audit Committee may be reached through the [contact information](#) provided by SIGA on its website.
- Procedures for Investigating and Resolving Accounting Concerns. The individual (who shall be the Chair of the Audit Committee) or Committee that receives a report under this Section of the Code may, in their discretion, assume responsibility for evaluating any possible violation and directing or conducting any investigation or may delegate any portion of such responsibility to the General Counsel, Board of Directors, another committee of the Board whose charge includes the matter at issue or another person or entity, either inside or outside the Company with relevant expertise and appropriate confidentiality protections. If the Audit Committee chooses to assume responsibility for evaluating any possible violation or directing or conducting any investigation where the investigation concerns a possible violation by a member of the Board, the Audit Committee, not including that member, may handle such follow up investigation. If the Audit Committee is conducting the investigation, it shall have the authority to engage independent counsel and other advisers, as it deems necessary, to assist in its investigation and decision process. Employees – whether a witness or the alleged violator – have an obligation to cooperate fully and truthfully in any investigation involving an alleged violation of this Code related to Accounting or any other issue. Failure to cooperate is itself a violation of the Code. After conducting the investigation, the results will be evaluated and the Company shall authorize such prompt response, follow-up and preventive actions, if any, as are deemed necessary and appropriate to address the substance of the findings based on the investigation. The Company reserves the right to take action, up to and including termination of employment, if appropriate and permissible under law and this Code, with respect to any employee determined to have engaged in improper conduct, or make any appropriate referral to authorities for further investigation and action, as warranted.



- Procedures for Investigating and Resolving All Other Concerns. Investigations of non-accounting Code violations will be managed and conducted by the General Counsel and Human Resources Director, and in their discretion, in partnership with the Chief Executive Officer, Chief Financial Officer, Chief Scientific Officer and Corporate Compliance Officer when necessary. Reported violations will be investigated diligently, carefully and objectively and wherever practicable and reasonable, the confidentiality and privacy of individuals involved will be protected. As stated above, Employees are expected to cooperate fully and truthfully in all investigations. The Company reserves the right to take action, up to and including termination of employment, if appropriate and permissible under applicable employment law and this Code, of any employee determined to have engaged in improper conduct, or make any appropriate referral to authorities as warranted.

#### **WAIVERS REQUESTED BY OUR OFFICERS AND DIRECTORS**

As noted above, this Code applies to officers and members of the board of directors as well as to our employees and staff, except that provisions related to outside compensation do not apply to members of the board of directors. Any waiver of any other specific provision of this Code for any individual director or any provision for any officer of the Company must be approved, if at all, in writing and in advance by a majority of the independent directors serving on the SIGA board of directors. Any such waiver that may be granted and is required to be disclosed by applicable law will be publicly disclosed by appropriate means.

#### **ACKNOWLEDGMENT OF RECEIPT OF CODE OF ETHICS AND BUSINESS CONDUCT**

I have received and read the Code of Ethics and Business Conduct of SIGA Technologies, Inc. and its subsidiaries (collectively, the "Company"). I understand the standards and policies contained in the Code and that there may be additional policies or laws specific to my job. I further agree to comply with the Code in its entirety.

If I have any question concerning the meaning of any part of the Code or any other Company policy, its application to any particular situation or the legal and regulatory requirements applicable to my position at SIGA, I understand that I can consult my Manager, Human Resources, the General Counsel or the Corporate Compliance Officer, knowing that my question or report to these individuals will, upon my request, be maintained in confidence to the extent reasonably possible.