

Restricted Party Screening Policy

Purpose

Idera, Inc. and its subsidiaries (a comprehensive list of all Idera's subsidiaries is available at <https://www.ideracorp.com/brands>) (collectively, the "Company") developed this Restricted Party Screening Policy ("Policy") to comply with U.S. export regulations, which prohibits the export, reexport, transfer (includes in-country transfer) to certain individuals, companies and organizations listed by various U.S. agencies that identified parties that one cannot do business with. That includes items that are EAR99 or otherwise don't require an export license based on the country of export.

These restricted parties are individuals, businesses and other organizations that have been identified as engaging in activities related to the proliferation of weapons of mass destruction, known to be involved in terrorism or drug trafficking, or who have had their export privileges suspended. These individuals, businesses or organizations could be located within the U.S. or overseas.

While there is no requirement that companies check every export against these various restricted party lists, it is a violation of export regulations to export to anyone on the U.S. lists. To that end, the Company should check all the parties in every export transaction against the various restricted party lists to prevent penalties.

Scope

The scope of this Policy is to list the countries in which the Company is prohibited to export/re-export and transfer products and services and to describe the process which the Company utilizes to screen all customers to ensure compliance with U.S. Export Compliance regulations. This Policy applies to Company's operations anywhere in the world, including all employees, distributors, partners, resellers.

The Company's revenue manager (for entities incorporated in the U.S.) and the Finance Director (for entities incorporated overseas) (collectively, the "Stakeholders") are responsible for ensuring that employees who report to them, directly or indirectly, comply with this Policy and complete any certification and training required of them. If you have any questions or concerns relating to this Policy, consult your manager, the Company's Legal Department or a member of the Compliance team at compliance@idera.com. If you learn of any conduct that you believe may violate this Policy, report it immediately by any of the means listed under the heading "Reporting and Non-Retaliation" below.

Prohibited End Users

In accordance with United States' and applicable export control and economic sanctions laws and regulations, all Company products and services¹ are prohibited for export/reexport/transfer (includes in-country transfer) to or access by the following:

- ***Any company or national of Cuba, Iran, North Korea, Sudan, Syria, and the Crimea region.*** Export licensing of commodities or services intended for these countries is presumed denied;
- ***Re-export to these countries is prohibited;*** you may not proceed with any proposed transaction if you "know or have reason to know" it would be contrary to U.S. or applicable laws or regulations;
- Any customer you know or have reason to know, who is involved in the design, development, manufacture or production of nuclear technology, or nuclear, biological or chemical "weapons of mass destruction."
- Please note: ***cloud access and/or download from these countries or regions*** is considered an export under U.S. export and applicable economic sanctions laws and regulations and ***is therefore prohibited.***

Restricted Party Screening

Before finalizing the sales transaction, the Stakeholders shall run the prospect customer contact information (i.e. name, address, country, phone number) against the Consolidated Screening List ("CSL"), which is a consolidation of multiple export screening lists of the Departments of Commerce, State and the Treasury and may be used as an aid to industry in conducting electronic screens of potential parties to regulated transactions. The parties listed in the CSL are restricted by the United States Government on exports, reexports or transfers of items.

It is important that the Company run the screening against the CSL public database available at <https://www.export.gov/article?id=Consolidated-Screening-List>. At this webpage, you will find instructions for downloading and searching the CSL. Please sign up for email updates to the CSL so you can update the downloaded version of the CSL every time that the list is updated.

In the event that a company, entity or person on the list appears to match a party potentially involved in the Company export transaction, additional due diligence should be conducted before proceeding. To that end, please email all information to compliance@idera.com and indicate in the subject line of the email "Export Compliance. Review Needed." for proper processing. The compliance team will work together with the legal department to determine if the match was a "false positive" or a "valid match".

Reporting and Non-Retaliation

¹ The Company products and services include but may not be limited to programs, integrated software, support, operating systems, product technical data, educations, consulting, cloud services.

Report any conduct that you believe to be a violation of this Policy, either directly to a member of the Compliance team at compliance@idera.com or to the Company's Legal Department at legal@idera.com. Your detailed notes and/or emails will be dealt with confidentiality, unless it is necessary to share such information in order to address the matter appropriately. Regardless, you have the Company commitment that you will be protected from retaliation.

The Company will not tolerate retaliation against an Employee for reporting a concern in good faith or for cooperating with a compliance investigation, even when no evidence is found to substantiate the report.

A failure to report known or suspected wrongdoing in connection with the Company's business of which the Company associate or agent has knowledge may, by itself, subject that individual to disciplinary action.

Further Information

Should you have any other questions about this Policy, please contact the parent company of the Idera corporate group legal department at legal@idera.com or the compliance team at compliance@idera.com.