

GUIDELINES REGARDING BUSINESS RELATIONS WITH RUSSIA

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1. PREFACE

IDT Biologika ("IDT") shares the international criticism of the attack of the Russian Federation ("Russia") on Ukraine in breach of international law and unequivocally condemns this inhumane war. In view of this, the following special regulations apply with regard to business relations with Russia.

2. DEFINITION OF TERMS

2.1. "Business relations with Russia" include business interaction with Russian companies, state or official establishments in Russia or representatives of the Russian government (hereinafter: "Russian business partners"). This also covers business relations with companies that are majority Russian owned.

2.2. The special regulations apply for all departments of IDT with business relations with external business partners, such as Commercial, Procurement, Human Resources ("involved IDT departments").

3. BUSINESS ENQUIRIES TO RUSSIAN BUSINESS PARTNERS

The involved IDT departments are required to refrain from submitting business enquiries or offers to Russian business partners or otherwise entering into commercial contact with these.

4. BUSINESS ENQUIRIES FROM RUSSIAN BUSINESS PARTNERS

In the case of enquiries from Russian business partners to involved IDT departments, these are to be forwarded to the Legal & Compliance department for further processing.

5. INVOLVEMENT OF RUSSIAN BUSINESS PARTNERS

Should our other business partners insist on the involvement of Russian business partners in a commercial cooperation, this enquiry is to be referred to the management board.

6. CONTACT

For questions regarding these guidelines, please contact the Compliance Officer at IDT Biologika, Annette Beth:

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7. PERIOD OF VALIDITY

These guidelines apply with immediate effect and are valid without limitation until such time as they are lifted.