

*Effective Date: April 12, 2022*

**SILO PHARMA, INC.**

**CORPORATE COMMUNICATIONS POLICY**

**General**

This Corporate Communications Policy (“Policy”) sets forth the guidelines that all employees, consultants and representatives of Silo Pharma, Inc. (the “Company”) must follow in communicating information concerning the Company to the general public or to financial analysts, the Company’s securityholders, potential investors or media representatives. This Policy covers all communications of information in whatever format such information is distributed (i.e., press release, earnings call, conference call, social media outlet, personal conversation, e-mail, scientific presentation, publication, etc.).

As a publicly-traded corporation, disclosure of information to the public by the Company or its employees and agents is regulated by federal securities laws and regulations. Premature or otherwise unauthorized disclosure of information about the Company could adversely affect the Company’s ability to fulfill its obligations under these laws and regulations. In addition, unauthorized disclosure could cause competitive harm, which may in some circumstances result in liability to the Company.

**Persons Authorized to Speak on Behalf of the Company**

Communicating to external audiences in a coordinated manner is critical to the Company business success. Therefore, communications with securityholders, investors, broker-dealers, securities analysts, the media or any other Enumerated Persons (as defined elsewhere in this Policy) are restricted to the Company Chief Executive Officer, Chief Financial Officer, Chief Scientific Officer, Chief Medical Officer, Chief Commercial Officer and Investor Relations department (“Authorized Spokespersons”). The Company’s Chief Executive Officer may, from time to time, designate other officers or individuals to respond to inquiries regarding particular areas of interest or focus. Under these circumstances, such individuals will also be considered Authorized Spokespersons.

- Referral to Investor Relations. All inquiries from securityholders, potential investors, the media and market analysts must be directed to the Company’s Investor Relations department at for review and response by the appropriate Company representative.

**Material Information**

Any time an Authorized Spokesperson determines to disclose or discuss nonpublic information about the Company, there must be a determination made prior to such disclosure whether the information is material in conjunction with counsel. “Material Nonpublic Information” is information that has not been disclosed to the general public and there is a reasonable likelihood that such information would be considered important to an investor in making a decision to purchase, hold or sell the Company’s stock. Both positive and negative information may be material. According to the Securities and Exchange Commission (the “SEC”), possible material information or events include, but are not limited to:

- earnings information;
- mergers, acquisitions, tender offers, joint ventures, or changes in assets;

- new products or discoveries, or developments regarding customers or suppliers (e.g., the acquisition or loss of a contract);
- changes in control or in management;
- changes in auditors or auditor notification that the issuer may no longer rely on an audit report;
- events regarding the issuer's securities (e.g., defaults on senior securities, calls of securities for redemption, repurchase plans, stock splits or changes in dividends, changes to the rights of securityholders, public or private sales of additional securities); and
- bankruptcies or receiverships.

### **Scientific Conferences**

Employees may from time to time participate in scientific conferences. Any speaking engagement must be pre-approved by the Chief Executive Officer. Unless approved by the Company's Corporate Compliance Officer, it is the Company's policy not to disclose Material Nonpublic Information at scientific conferences. If the Company does not have a designated Corporate Compliance Officer then the Chief Executive Officer will serve as the Corporate Compliance Officer. The Chief Executive Officer will take such steps as the Chief Executive Officer deems appropriate to ensure that Company representatives from the Chief Executive Officer's department who participate in scientific conferences, or the supervisors of such Company representatives, as appropriate, are familiar with the guidelines set forth in this Policy. In addition, absent unusual circumstances, the Company will issue press releases to announce clinical developments or other relevant material product/scientific developments prior to or concurrently with any disclosure at scientific conferences.

### **Internet Communications**

Employees are prohibited from publishing information on behalf of the Company or from disclosing nonpublic or material information regarding any aspect of the Company's business on the Internet unless otherwise authorized. Publication on the Internet includes, but is not limited to, social media sites (Facebook, Google+, Twitter, LinkedIn, etc.), chat rooms, message boards and blogs, regardless of whether an employee uses his or her own name or a pseudonym, or whether an employee accesses such locations from the office or outside the office.

Information about the Company posted on the Internet by employees or other parties is not to be considered information made publicly available by the Company or otherwise attributable to the Company.

### **Communicating With the Public**

We are committed to transparency in our disclosures and public communications to ensure that decisions made by investors and others are based on complete, timely and accurate information. We are heavily regulated by the FDA for any product-related communication. To meet these commitments, we must ensure that information released to the media, the public, medical organizations and government regulators is accurate, not misleading, and approved by the Company. We must also remain vigilant as outside parties may seek to gain any confidential or sensitive insights for competitive, unethical or investment reasons through unsuspecting Company employees. For this reason, it is important that only authorized persons speak or communicate on behalf of the Company.

- If you receive an inquiry from the media or public through email, telephone, or any social network (LinkedIn, Facebook, etc.) regarding the Company's activities, results, plans, or position

on any issues, you should refer the matter to the CEO or Public Relations. Please forward any and all inquiries you receive to the CEO or Public Relations.

- Unless authorized by the CEO or Public Relations, you should never speak or communicate on behalf of the Company or give the impression that you are speaking on behalf of the Company in any communication that may become public, including by email or through social networks such as LinkedIn, Facebook, etc.
- We advise our business partners not to use the Company name in advertising without approval from the CEO or Public Relations.
- You should be wary and careful when receiving any proposals to take part in "market research" where you or the Company may be paid for yours or its "industry expertise" as this is often a front by third parties trying to learn confidential or sensitive information about the Company.
- Please be mindful of your obligations to protect Company information which is part of the Confidentiality Agreements you have with the Company.
- If ever in doubt, please reach out immediately to the CEO or Public Relations with any questions.

## **Rumors**

It is the Company's policy not to comment on market rumors. When it is learned that rumors about the Company are circulating, the Authorized Spokespersons should state only that it is the Company's policy not to comment on rumors. Any such rumors should be reported to the Corporate Compliance Officer to assess if any public disclosure is required.

## **Publicity Materials, Meetings and Conference Calls**

### *Publicity Materials*

All publicity materials (such as press releases, investor presentations, webcasts and marketing materials) concerning matters that may be material to the Company must be submitted to the Corporate Compliance Officer for review and approval before they are distributed. The Corporate Compliance Officer will facilitate review by the Company's legal counsel.

### *Meetings and Conference Calls*

If a meeting or conference call is to be held, the purpose of which is to give analysts or major securityholders an opportunity to seek more information or ask questions concerning the information disclosed in a press release, the meeting or call must be preceded by a press release issued to all major news wires and posted on the Company's website issued a reasonable amount of time in advance announcing that such meeting or call will take place, describing the primary topics to be addressed during such meeting or call, and providing the date, time, telephone number and webcast URL for the meeting or call. The meeting or call must be open to analysts, media representatives and the general public. Notwithstanding the foregoing, any such meeting or call held by Investor Relations or another Authorized Spokesperson for the purpose of solely providing immaterial information will not be subject to the requirements of this paragraph.

### *Quarterly Earnings and Investor Conference Calls*

Adequate advance public notice must be given of any quarterly earnings conference calls and/or webcasts or other investor conference calls and/or webcasts. Notice shall include a press release issued to all major news wires and a posting on the Company's website with information including the primary topics to be covered, date, time, telephone number and webcast URL for the conference call and/or webcast. The press release should also state the period, if any, for which a replay of the webcast will be available. A conference call and/or

webcast must be open to analysts, media representatives and the general public. It is permissible to allow only analysts to submit questions. Investor Relations shall consult with the Corporate Compliance Officer to determine whether playback of the conference call and/or webcast should be provided on the Company's website after the conference call/webcast.

Prior to the issuance of quarterly earnings projections (which will ordinarily be issued through a press release and filing a Current Report on Form 8-K with the SEC), the Company will observe a "quiet period," during which the Company will not comment on any matters relating to the financial outlook of the Company. These periods will normally begin at the end of each fiscal quarter and continue until earnings results are publicly released for that quarter. In response to any question about projections, Authorized Spokespersons should say only that it is the Company's policy not to comment on projections during the quarter. The Company will not comment on its intention to update its earnings projections.

Following the issuance of quarterly earnings projections, no Authorized Spokesperson may provide "comfort" with respect to earnings or other estimates or otherwise "walk the Street" up or down (i.e., suggest adjustments to an analyst's estimates). A statement by the Company indicating that it has "not changed" or that it is "still comfortable with" prior guidance is the same as providing a direct confirmation of the prior guidance. Further, merely a reference to the prior guidance may imply confirmation of that guidance. Therefore, if an analyst inquires as to the reliability of a previously, publicly disseminated projection, the spokesperson should follow the "no comment" policy.

#### *Analyst Reports*

Analyst reports and earnings models may be reviewed only to correct errors that can be corrected by referring to publicly available, historical, factual information or to correct any mathematical errors. No other analyst feedback or guidance on earnings models may be communicated to an analyst. A written record should be kept by Investor Relations of any comments provided on an analyst's report. No Company employee should distribute copies of, or refer to, selected analysts' reports to anyone outside the Company. This is consistent with the Company's intention not to adopt any particular analyst report.

#### *Misleading or Inaccurate Disclosures*

If an employee of the Company learns of information that causes him or her to believe that a disclosure may have been misleading or inaccurate when made or may no longer be true, such person should report that information immediately to the Corporate Compliance Officer.

### **Prohibition of Selective Disclosure of Material Non-Public Information**

#### *Communications with Analysts, Securityholders and Others*

In 2000, the SEC adopted Regulation FD (for "Fair Disclosure") to address selective disclosure of Material Nonpublic Information by companies to analysts and major institutional investors, in order to level the playing field for investors of all sizes by promoting full and fair disclosure. Regulation FD prohibits the selective disclosure of Material Nonpublic Information to certain Enumerated Persons, including:

- broker-dealers and persons associated with them, including investment analysts;
- investment advisers;
- certain institutional investment managers and their associated persons;
- investment companies, hedge funds and affiliated persons; and

- any securityholder under circumstances in which it is reasonably foreseeable that the securityholder would purchase or sell securities on the basis of the information.

The regulation is intended to eliminate situations where a company may disclose important nonpublic information, such as significant clinical developments or earnings warnings, to securities analysts or selected institutional investors, before disclosing the information to the general public.

#### *Disclosure Requirements under Regulation FD*

If the determination is made that information to be disclosed is Material Nonpublic Information, Regulation FD requires that the information be disclosed via a means reasonably designed to provide broad, non-exclusionary distribution to the public (e.g., a press release or Current Report on Form 8-K) before or at the same time that the information is disclosed to any Enumerated Person. The public disclosure may either refer to the material information or, if it is issued prior to disclosure to the Enumerated Person, may indicate that a conference call and/or webcast will be held to disclose the information. The public must be given adequate advance notice of any conference call and/or webcast, its scope and the means of accessing it. For example, prior to a conference or roadshow, the Company will disclose either through a press release, an open conference call or a webcast, or any combination of these methods, any material information that is not already public and which may be discussed or presented at the conference or the roadshow.

In the case of an unintentional disclosure of Material Nonpublic Information to an Enumerated Person, the Company will be required to provide public disclosure of such information “promptly,” but no later than either 24 hours after discovery of the unintentional disclosure or prior to the commencement of the next day’s trading on the Nasdaq Stock Market, if later.

#### *Limited Exception*

Communications in the ordinary course of business with customers, suppliers or strategic partners, as well as communications with the press or news organizations, rating agencies, or the government, are not covered by Regulation FD. In addition, selective disclosure to Enumerated Persons may be permissible if such communications are subject to a nondisclosure agreement. Please contact the Corporate Compliance Officer should you require more information on this limited exception.

#### **Violation of this Policy**

Violations of federal securities laws may result in enforcement action by the SEC. In addition, any violation of this Policy could subject you to disciplinary action up to, and including, termination of service or employment and, in appropriate cases, civil action or referral for criminal prosecution.

#### **Questions about this Policy/Reporting Matters**

Any questions regarding this Policy or matters to be reported under this Policy should be referred to the Company’s Corporate Compliance Officer or CEO.