

**DESCRIPTION OF AMENDMENTS TO
SORRENTO THERAPEUTICS, INC.
CODE OF BUSINESS CONDUCT AND ETHICS**

NOVEMBER 2022

On November 16, 2022, the Board of Directors of Sorrento Therapeutics, Inc. (“*Sorrento*”) approved a revised Code of Business Conduct and Ethics for Employees, Executive Officers and Directors (as revised, the “*Code*”) that amended and restated Sorrento’s prior Code of Business Conduct and Ethics for Employees, Executive Officers and Directors (the “*Prior Code*”). The Code supersedes the Prior Code.

None of the amendments reflected in the Code constituted or effected a waiver of any provision of the Prior Code applicable to Sorrento’s principal executive officer, principal financial officer, principal accounting officer or controller, or persons performing similar functions.

The following is a summary overview of the material amendments to the Prior Code:

1. Compliance with Laws Relating to Government Health Care Programs

A new, separate section covering compliance with laws relating to government health care programs, including the federal Anti-Kickback Statute, has been added to the Prior Code, which includes the following, among other things:

- a summary of the Anti-Kickback Statute and certain activities prohibited thereby;
- a statement that Sorrento and its customers could be subject to penalties for violation the anti-kickback laws, which could include imprisonment and fines; and
- a statement that persons subject to the Code must not violate the Anti-Kickback Statute and, whenever possible, should ensure activities are structured to fall within a safe harbor.

2. Gifts, Meals and Entertainment

A discussion regarding interactions with health care professionals has been added to the “Gifts, Meals and Entertainments” Section of the Code.

3. Compliance Officer

The Prior Code has been amended to update the identity of the current Compliance Officer and to provide the contact information for the current Compliance Officer.

The foregoing summary of the material amendments to the Prior Code does not purport to be complete and is qualified in its entirety by reference to the full text of the Code, as may be amended or restated from time to time, which is available on Sorrento’s website at <https://investors.sorrentotherapeutics.com/static-files/19c2ae8a-3afd-441b-8bb7-17269188e1a9>.