

**DESCRIPTION OF AMENDMENTS TO  
SORRENTO THERAPEUTICS CODE OF BUSINESS CONDUCT AND ETHICS FOR  
EMPLOYEES, EXECUTIVE OFFICERS AND DIRECTORS**

**OCTOBER 2022**

On October 11, 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. International Business Laws**

The Prior Code has been amended to expand the discussions regarding U.S. Sanctions, U.S. Export Controls and U.S. Antiboycott Laws.

**2. Conflicts of Interest**

The Prior Code has been amended to expand the list of examples of situations that may constitute or give rise to a conflict of interests.

**3. Forced Labor; Child Labor**

The Prior Code has been amended to include a statement regarding Sorrento’s prohibition of forced labor, including slavery, human trafficking or other forced labor, or any labor in violation of child labor laws.

**4. Electronic Communications**

A discussion regarding the proper use of electronic communications has been added to the “Protection and Proper Use of Company Assets” Section of the Code.

**5. Data Privacy**

The Prior Code has been amended to include a discussion of Sorrento’s commitment to data protection, including that:

- personal information should only be collected when needed and in accordance with applicable laws and Sorrento’s policies;
- information should be held securely and protected from attack, damage or unauthorized access; and

- personal information should only be shared with others when there is a legitimate business or legal need to do so.

## **6. Confidentiality**

The Prior Code has been amended to expand the nonexclusive list of information that is deemed Confidential Information of Sorrento.

## **7. Compliance Resources**

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>.