

## TITAN PHARMACEUTICALS, INC.

### TITAN Corporate Compliance

Titan Pharmaceuticals, Inc. develops novel and proprietary products for the improved treatment of central nervous system disorders. Titan's mission is the rapid development of innovative products designed to extend patient survival and improve quality of life.

Titan's compliance program is based on the "Commercial Compliance Program Guidance for Pharmaceutical Manufacturers," published by the Office of Inspector General (OIG), U.S. Department of Health and Human Services (DHHS), and the "Code on Interactions with Healthcare Professionals," published by Pharmaceutical Research and Manufacturers of America (PhRMA).

### Compliance Leadership

An individual has been identified and is responsible for overseeing the administration and implementation of the Compliance Program. This person reports to the President/CEO of Titan and also has the authority to report any compliance concerns directly to Titan's Board of Directors.

### Compliance Committee

The Company has an established Compliance Committee which meets at least quarterly. The mission of the Compliance Committees includes ensuring the implementation and effectiveness of all components of the Compliance Program.

### Documented Compliance Policies and Procedures

Titan has documented policies and procedures that address the Company's expectations regarding adherence to all applicable laws and regulations.

### Training and Education

Titan has implemented training programs to educate employees on the Code of Business Conduct, laws, regulations, policies and procedures which are applicable to the employee's job responsibilities. The Company has implemented training programs to educate employees on the Code, on new and existing compliance policies, and on the standards and procedures applicable to their job functions. The training program is subject to review and updates as deemed appropriate by the company.

### Communicating Compliance Issues

Titan is committed to fostering an open communication environment to encourage the reporting of concerns about suspected improper business practices. This includes reporting of potential violation of law, regulations or company policies and procedures.

Employees can make reports of potential problematic conduct to their managers or they can contact the Compliance Officer or the Compliance Hotline at 1-800-398-1496 or completing a questionnaire at [www.lighthouse-services.com](http://www.lighthouse-services.com) and entering the following case-sensitive username and password:

Username: titan

Password: complaint

If desired, the individual may submit reports anonymously.

Titan does not tolerate any form of retaliation against individuals who report in good faith potential improper, unethical or illegal conduct.

#### Monitoring and Auditing

The Titan Compliance Program includes activities designed to monitor and audit compliance with the Company's policies and procedures. On a periodic basis, but not less than annually, the U.S. Compliance Officer develops an audit plan. The company implements corrective actions deemed necessary as the result of audit and monitoring findings.

#### Corrective Action and Discipline

If it is determined, after investigation, that noncompliant conduct occurred after completing an investigation, appropriate corrective and/or disciplinary action will occur. Responses and disciplinary action may include (but is not limited to) termination. The company is committed to implementing corrective and preventive measures to enhance its controls to prevent further violations.

#### Updating the Compliance Program

From time to time, the Company may amend its Compliance Program. The Compliance Committees shall review all changes suggested by the Compliance Officer, members of the Compliance Committee, or other Company personnel.

#### Annual Declaration of Compliance for Purposes of California Health and Safety Code Sections 119400-119402

California Health & Safety Code, Sections 119400 – 119402, ("California Compliance Law") requires pharmaceutical companies to adopt a compliance program in accordance with the April 2003 publication "Compliance Program Guidance for Pharmaceutical Manufacturers" ("OIG Compliance Guidance") developed by the United States Department of Health and Human Services Office of Inspector General ("OIG") and policies for compliance with the Pharmaceutical Research and Manufacturers of America ("PhRMA") "Code on Interactions with Health Care Professionals" ("PhRMA Code") within six months of any update or revision of the PhRMA Code. Revisions to the July 1, 2002 PhRMA Code were effective January 2009. Titan has developed a Comprehensive Compliance Program (CCP) in accordance with the requirements of California Health & Safety Code sections 119400-119402. As of February 1, 2020, Titan hereby declares in good faith that it is, in all material respects, in compliance with its CCP and the requirements of California Health & Safety Code §§ 119400-119402. Titan has developed and implemented elements of its CCP to address certain issues uniquely raised by the California law. In addition, compliance is a dynamic concept and, therefore, Titan periodically assesses the effectiveness of its CCP and may modify aspects of the CCP to enhance it. For a copy of this declaration and a description of Titan's CCP, call 650-244-4990.

In accordance with California Health and Safety Code section 119402(d)(1), Titan has established an annual limit of \$2500 for spending on promotional items and activities provided to health care professionals licensed in California. Such items are generally provided to health care professionals in order to facilitate an educational or scientific discussion about the company's products, research and development efforts, and other healthcare related issues. Titan's limit also includes educational items provided to a physician (such as medical textbook) that are intended to benefit patient care. Pursuant to California Health & Safety Code §119402(d)(2) and (3), drug samples given to healthcare professionals intended for free

distribution to patients, financial support for continuing medical education forums, financial support for health educational scholarships, and fair market value payments made for legitimate services provided by a health care professional to Titan, including but not limited to consulting, have also been excluded from the spending limit. This stated limit is not a goal, but a maximum that the company sets for itself as a limitation. In most cases, the amounts actually spent are significantly less than the maximum amount set by this limitation. Titan may change this spending limit upon review at the discretion of the Company.