



2018 Annual Declaration of Compliance

As part of our continuing commitment to corporate compliance, SCILEX Pharmaceuticals Inc. (SCILEX) declares that, to the best of its knowledge, and based on a good faith understanding of the statutory requirements of California Health and Safety Code sections 119400 - 119402, SCILEX has established a California Comprehensive Compliance Program (CCP) as mandated by California law.

The CCP includes policies, procedures and processes to address risk areas identified in the "Compliance Program Guidance for Pharmaceutical Manufacturers" published by the Office of the Inspector General, U.S. Department of Health and Human Services (OIG Guidance) and the Pharmaceutical Research and Manufacturers of America voluntary code on Interactions with Healthcare Professionals (the "PhRMA Code").

For purposes of complying with the California Health and Safety Code § 119402, SCILEX has established a \$2,000 annual dollar limit on business meals and educational items that may be provided to an individual healthcare professional. Waiver of the limit would require the approval of the Chief Compliance Officer. As of October 22, 2018, SCILEX declares that, to the best of its knowledge and based on a good faith understanding of the requirements of the statute, it is in compliance with its CCP and with California Health and Safety Code §§ 119400 - 119402, in all material aspects.

Copies of the SCILEX Annual Declaration of Compliance, SCILEX Comprehensive Compliance Program description, and SCILEX Code of Conduct can be obtained on our website at www.scilexpharma.com or by calling the Compliance Hotline at 844-724-5392.