

BIOXCEL THERAPEUTICS, INC.

Disclosure of Amendments to the Code of Business Conduct and Ethics

On July 26, 2022, the Board of Directors (the “*Board*”) of BioXcel Therapeutics, Inc. (the “*Company*”) adopted a number of amendments to the Company’s Code of Business Conduct and Ethics (the “*Code*”). The amendments were adopted to:

- provide an updated ethics hotline telephone number and website;
- clarify processes relating to the internal reporting of violations of the Code;
- expand on certain provisions relating to compliance with International Trade Controls Laws; and
- add the Chief Legal Officer as an officer in addition to, or in lieu of, the Chief Financial Officer, to whom questions about the Code, required approvals thereunder and reports of violations of the Code may be directed.

Other changes to the Code included those of a technical, administrative and non-substantive nature.

The Code, as amended, has been posted to the Corporate Governance – Governance Documents section of the Company’s website (<http://www.bioxceltherapeutics.com>). The foregoing described amendments to the Code did not result in any waiver, explicit or implicit, from any provision of the Code as in effect prior to the Board’s actions to amend the Code.
