



Commitment to Compliance and California Compliance Declaration June 2022

BioXcel Therapeutics, Inc. (BioXcel) is committed to conducting its affairs in compliance with all applicable laws and industry practices. Our comprehensive healthcare compliance program (Compliance Program) is designed in accordance with recommendations provided by the U.S. Department of Health and Human Services (HSS), Office of the Inspector General (OIG), and the Pharmaceutical Research and Manufacturers of America (PhRMA). The Compliance Program is intended to prevent violations of the law and company policy and to detect and resolve potential violations. Regular monitoring, auditing, and updating of the program help ensure that the Compliance Program remains viable and effective.

Compliance is the culture of BioXcel and is the responsibility of every person at BioXcel. BioXcel encourages open lines of communication, fosters an open-door environment, offers an anonymous compliance hotline (1-844-718-1224), and has a clear anti-retaliation policy.

Compliance Governance:

BioXcel's Chief Compliance Officer chairs the Compliance Committee and oversees and administers BioXcel's Compliance Program. The Compliance Committee meets at least quarterly and is composed of senior-level BioXcel personnel charged with assisting the Chief Compliance Officer in implementing BioXcel's compliance program, which includes policies and procedures, training and education, open lines of communication, and monitoring and auditing. The Chief Compliance Officer meets regularly with the BioXcel Board of Directors and reports to them on the progress and implementation of the Compliance Program.

Written Policies and Procedures:

BioXcel's Healthcare Compliance Manual and Code of Business Conduct and Ethics reflects the principles of corporate responsibility and integrity that all BioXcel personnel must meet. BioXcel's written policies and procedures apply to its business activities across various legal, regulatory, and business areas. BioXcel regularly reviews its policies and procedures to ensure they are up-to-date and address the legal and regulatory risks that impact its business operations.

Effective Training and Education:

BioXcel provides online and live training and compliance education to BioXcel personnel. This training includes comprehensive new-hire training, annual on-line compliance training, and targeted in-person training based on risk assessments and the advice of the Legal & Healthcare Compliance Department.

Effective Lines of Communication:

BioXcel has an open-door policy that encourages BioXcel personnel to disclose any concerns, questions, problems, or suggestions to their supervisors or management, the Human Resources Department, and the Legal & Healthcare Compliance Department. The Company also maintains an anonymous compliance hotline (1-844-718-1224) to facilitate its open-door policy and to establish a pathway to raise concerns anonymously and confidentially. The Company also maintains a strict policy prohibiting retaliation.



Internal Monitoring and Auditing:

Internal auditing and monitoring serve as fundamental components of BioXcel's Compliance Program. BioXcel continues to evaluate activities that, among other things, could substantially impact its business operations. BioXcel believes that proactive monitoring and auditing activities help prevent and detect compliance issues and allow for the implementation of preventive or remedial activities in a timely manner.

Enforcement:

BioXcel's corporate policies and procedures, including BioXcel's Healthcare Compliance Manual and Code of Business Conduct and Ethics, make it clear that there are consequences for failing to adhere to BioXcel's compliance mission, including termination of employment. BioXcel's corporate policies and procedures are published and provided to all BioXcel personnel.

Prompt Response & Corrective Actions:

BioXcel's Compliance Program is designed and staffed so that compliance deviations or issues will be reviewed and investigated promptly and appropriately. BioXcel will take all appropriate corrective actions after completion of all investigations.

Interactions with Healthcare Professionals in California & Declaration of Compliance:

BioXcel's Compliance Program complies with California Health and Safety Code §§ 119400-119402 and the provisions of the Code of Interactions with Healthcare Professionals created by the Pharmaceutical Research and Manufacturers of America (PhRMA Code). The Compliance Program has an annual limit of \$2500 on aggregate expenditures for certain healthcare professional (HCP) interactions. This limit may be updated at BioXcel's discretion and takes into account restrictions on transfers of value to HCPs under federal, state, and local laws and industry codes of conduct, as well as the size, structure, and organization of BioXcel.

Based upon its good faith understanding of the requirements of California's Health and Safety Code §§ 119400-119402, BioXcel believes it is in compliance with its Comprehensive Compliance Program and California's Health and Safety Code §§ 119400-119402. BioXcel will continue to update this declaration on an annual basis. A description of BioXcel's Healthcare Compliance Program can be requested by calling the Compliance Helpline number at (1-844-718-1224) or by emailing Compliance at compliance@bioxccltherapeutics.com.