

**STATE OF CALIFORNIA  
COMPREHENSIVE COMPLIANCE PROGRAM**

Tonix Pharmaceutical Holding Corp. (“Tonix”) has developed a Comprehensive Compliance Program (“CCP”) that is compliant with the requirements of the California Marketing Practices Act (California Health and Safety Code §§ 119400-119402), the HHS OIG Compliance Program Guidance for Pharmaceutical Manufacturers, and the PhRMA Code on Interactions with Healthcare Professionals. Tonix’s CCP is tailored to the size, organizational structure, and resources of the company, and is reasonably designed to prevent and detect compliance violations in accordance with the HHS OIG Compliance Program Guidance for Pharmaceutical Manufacturers. To the best of our knowledge, Tonix is in compliance with its CCP and the requirements of the California Health and Safety Code §§ 119400-119402 as of this date. Tonix will continually evaluate and update its CCP as necessary and appropriate on an ongoing basis. Tonix is committed to upholding the highest standards of business conduct and ethics in its relationships with customers, employees, shareholders, the business community, and state and federal governments.

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Copies of this Declaration and a description of our Comprehensive Compliance Program may be obtained by calling 1-888-TNXP MED (869-7633)