

SEELOS THERAPEUTICS, INC.

ANTI-FRAUD AND WHISTLEBLOWER POLICY AND PROCEDURE

Purpose

The purpose of this policy and procedure (this “*Policy*”) is to outline the policy and procedures of Seelos Therapeutics, Inc. and its subsidiaries (the “*Company*”) relating to ethics and compliance, which generally covers:

- Accounting/financial controls and reporting
- Confidentiality, privacy and security
- Equal employment opportunity/discrimination/harassment
- Ethics or code of conduct violations
- Legal or regulatory violations
- Unfair or illegal trade practices
- Theft or fraud

Scope/Applicability

This Policy applies to all employees of the Company and is to be implemented by the Chair of the Audit Committee.

Responsibilities

The Company’s management will train and make all employees aware of this Policy:

1. for new employees as part of their orientation, and
2. for existing employees, within two weeks of approval of this document.

Management has established a confidential ethics reporting system through Lighthouse Services, Inc., which will be available 24 hours a day, seven days a week to all employees.

The Chair of the Audit Committee will respond to any concerns where the caller’s identity is made known, and will investigate all complaints received (including anonymous complaints) as appropriate, which includes opening, tracking and closing the report. Each employee’s confidentiality must be maintained on every report whether anonymous, or the identity is known. Harassment or victimization of individuals submitting reports will not be tolerated.

General/Definitions

The Company's dedicated confidential ethics reporting system is for employees to report information to the Chair of the Audit Committee regarding questionable accounting or auditing matters, as well as violations of regulations (including those of the Securities and Exchange Commission and The Nasdaq Stock Market LLC), violations of company policies, improper contact with government officials, insider trading, conflicts of interest, harassment or discrimination, threats or violence, theft or fraud and on-the-job alcohol or drug abuse.

Procedure

The Chair of the Audit Committee will be informed by Lighthouse Services, Inc. of any reports made through the ethics reporting system.

The Chair of the Audit Committee will investigate all reports directly and take appropriate action, which may include termination and prosecution.

Reporting

The whistleblowing procedure is intended to be used for serious and sensitive issues. Serious concerns relating to financial reporting, and unethical or illegal conduct should be reported in either of the following ways:

- Toll-free telephone:
 - English-speaking USA and Canada (not available from Mexico): (855) 400-6002
 - Spanish-speaking North America: (800) 216-1288
 - Spanish-speaking Dialing from Mexico: 001-800-216-1288
- Website: <https://www.lighthouse-services.com>
- Email: reports@lighthouse-services.com (Company name must be included with report)
- Fax: (215) 689-3885 (Company name must be included with report)

Reporters to the ethics system will have the ability to remain anonymous, if they choose. Please note that the information provided by you may be the basis of an internal and/or external investigation into the issue you are reporting and your anonymity will be protected to the extent possible by law. However, your identity may become known during the course of the

investigation because of the information you have provided. Reports are submitted by Lighthouse Services, Inc. to Seelos Therapeutics, Inc. or its designee, and may or may not be investigated at the sole discretion of our Company.

Employment-related concerns should continue to be reported through your normal channels such as your supervisor, a human resources representative or a member of management.

Last Revised: May 13, 2019