

Annual Declaration of Compliance for California

Based on a good faith understanding of the statutory requirements, the Comprehensive Compliance Program of Otonomy, Inc. (“Otonomy”) meets the requirements of California Health and Safety Code sections 119400-119402. Otonomy requires its employees comply with its Comprehensive Compliance Program. Furthermore, its Comprehensive Compliance Program is designed to prevent and detect violations. In the event Otonomy becomes aware of potential violations of law or company policy, Otonomy will, where appropriate, take reasonable steps to investigate the matter, pursue disciplinary action, and/or implement corrective/disciplinary measures or measures to prevent future violations.

Otonomy’s Comprehensive Compliance Program is aligned with the United States Department of Health and Human Services, Office of Inspector General’s April 2003 “Compliance Program Guidance for Pharmaceutical Manufacturers”, and the Pharmaceutical Research and Manufacturers of America’s “Code on Interactions with Health Care Professionals”. To the extent Otonomy is allowed to provide such items pursuant to its Comprehensive Compliance Program, Otonomy has established an annual aggregate dollar limit per healthcare professional licensed in California for gifts that are educational and intended to enhance patient care, promotional materials, or other items or activities that may be given to such individual.

Copies of this declaration and Otonomy’s Comprehensive Compliance Program are available to view on our corporate website and can be requested by calling the Ethics Helpline that is available 24 hours a day, seven days a week at 1-866-899-1922 or by emailing Compliance@Otonomy.com.

Date: June 13, 2019