CALIFORNIA COMPREHENSIVE COMPLIANCE POLICY

1.0 INTRODUCTION

Corcept Therapeutics Incorporated ("Corcept", "Company") is committed to conducting its global business based on the highest ethical standards. In the United States, a key component of this commitment is the establishment and maintenance of a Comprehensive Compliance Program (CCP) in accordance with California Health and Safety Code section 119400, that adopts the principles of the Pharmaceutical Research and Manufacturers of America voluntary Code on Interactions with Healthcare Professionals (PhRMA Code) and the *Compliance Program Guidance for Pharmaceutical Manufacturers* published by the Office of the Inspector General, U.S. Department of Health and Human Services (OIG Guidance).

The purpose of our CCP is to prevent and detect violations of law or company policy. As the OIG Guidance recognizes, however, the implementation of such a program cannot guarantee that improper employee conduct will be eliminated. Nonetheless, it is our expectation that employees will comply with the principles of the PhRMA Code, the Corcept Code of Conduct and Code of Ethics, Corcept's Policies for Interactions with Healthcare Professionals, as well as with other company policies. If Corcept becomes aware of violations of law or company policy, we will investigate the matter and, where appropriate, implement corrective measures to prevent future violations.

We believe that our program is scalable to address the size, organizational structure and resources of our company and will continue to evolve accordingly. We regularly monitor and reassess the program to improve it. Described below are the fundamental elements of the Corcept CCP.

2.0 COMPLIANCE PROGRAM OVERVIEW

2.1 Leadership and Structure.

- Compliance Officer. Corcept has appointed a Compliance Officer, who is charged with developing, operating and monitoring the CCP, and is advised regularly by the Corcept Compliance Committee. The Compliance Officer reports directly to the CEO of Corcept and has direct access to the Corcept Board of Directors and senior management. The Compliance Officer provides a report on the CCP to Corcept senior management and the Corcept Board or the Nominating and Corporate Governance Committee of the Board of Directors both annually and on an as-needed basis.

- Compliance Committee. Corcept has established a Compliance Committee to advise the Compliance Officer and assist in the implementation of the CCP. The Compliance Committee is comprised of members from functional units across the company. It meets on a periodic basis to monitor company activities and compliance developments.

2.2 Written standards.

- Corcept has established written policies and procedures to ensure compliance, including the Corcept Code of Conduct, Corcept Code of Ethics, Corcept Compliance Committee Charter, Corcept's Policies for Interactions with Healthcare Professionals, and numerous complimentary policies that outline the company's global commitment to compliance and corporate accountability. The standards set forth in the policies apply to all Corcept employees, and adherence to company policies is a condition of employment. Corcept expects all officers and managers to review policies with their employees and to ensure adherence to applicable policies, procedures, laws, guidance, and regulations.
- Our marketing policies conform to the PhRMA Code.
- Corcept has established spending parameters, which include an annual upper dollar limit of $2,000 on meals, refreshments and educational items provided to an individual California healthcare professional. Any meals or refreshments provided to healthcare professionals and/or members of their staff must be (a) modest as judged by local standards, (b) not part of an entertainment or recreational event, and (c) provided in a manner conducive to informational communication to provide scientific and educational information. Any educational items provided must be designed primarily for the education of patients or healthcare professionals, are not of substantial value ($100 or less) and do not have value to healthcare professionals outside of their professional responsibilities. We track and monitor these spending parameters to the best of our ability, using available resources, and will modify them if necessary. This aggregate limit does not include documents and information that serve as the basis of Corcept's interactions with healthcare professionals and inform such individuals about our products and provide scientific and educational data, support for continuing medical educational forums and education and research grants. Also, excluded are any arrangements under which an individual medical or healthcare professional provides legitimate business service to Corcept for which Corcept pays the fair market value of such services. This dollar limit is a spending cap, not a goal or average, and typically the amount spent per physician on allowable items is substantially less than this maximum amount.

2.3 Education and Training.

- All employees receive general compliance training applicable to their job function and responsibilities, which includes training on applicable Corcept policies. Specialized training occurs in specific departments where a need for additional training has been identified. Annual healthcare compliance training is required of all covered employees who engage in, or support, commercial activities. Employees are trained on how to report compliance concerns through internal channels, including anonymously through the Compliance Hotline.

2.4 Internal Lines of Communication.

A variety of internal communications tools exist for communicating compliance issues and concerns. As a matter of policy, employees are required to report alleged violations of policy to management or the Compliance Officer without fear of retaliation or recrimination. Any person may report a compliance issue or concern in-person, by telephone or in writing. Calls made to Corcept's Compliance Hotline will be received by the Company's Compliance Officer. This telephone line is available 24 hours a day, seven days a week. Alternatively, reports may be made in writing marked CONFIDENTIAL and mailed to the Compliance Officer's attention at the company's headquarters. In addition, any person may report a compliance issue directly to the Audit Committee of Corcept's Board of Directors.

2.5 Auditing and Monitoring.

The Corcept Compliance Committee approves a compliance auditing and monitoring plan that includes at least an annual audit and various monitoring activities. The nature of the reviews, as well as the extent and frequency of our compliance monitoring and auditing, varies according to a variety of factors, including new regulatory requirements, changes in business practices and other considerations. Results are reported to the Compliance Committee and to appropriate managers.

2.6 Responding to Potential Violations.

Enforcement action for CCP violations is addressed in Corcept's company policies. We have a progressive disciplinary process, up to and including termination, depending upon the severity of the violation.

2.7 Corrective Action Procedures.

Our CCP requires that the company respond promptly to potential violations of law or company policy. After investigation of a reported or detected issue, the company will assess whether disciplinary action is appropriate, and whether a violation is in part due to gaps in our policies, practices, training, or internal controls, and take action to prevent future violations.

Copies of the Corcept California Declaration of Compliance, Corcept Comprehensive Compliance Program description and Corcept Code of Ethics can be obtained on our website at www.corcept.com or by calling the Compliance Hotline at 855-212-2678.

3.0 ANNUAL DECLARATION OF COMPLIANCE

As part of our continuing commitment to corporate compliance, Corcept Therapeutics Incorporated (Corcept) declares that, to the best of its knowledge, based on a good faith understanding of the statutory requirements of California Health and Safety Code sections 119400, that Corcept has established a California Comprehensive Compliance Program (CCP) as mandated by California law.

The CCP contains policies, procedures and processes to address risk areas identified in the "Compliance Program Guidance for Pharmaceutical Manufacturers" published by the Office of the Inspector General, U.S. Department of Health and Human Services (OIG Guidance) and the Pharmaceutical Research and Manufacturers of America voluntary code on Interactions with Healthcare Professionals (the "PhRMA Code").

For purposes of complying with the California Health and Safety Code § 119402, Corcept has established a $2,000 annual dollar limit on business meals and educational items that may be provided to an individual healthcare professional. Waiver of the limit would require the approval of the Chief Compliance Officer. As of the date of this declaration, Corcept declares that, to the best of its knowledge and based on a good faith understanding of the requirements of the statute, it follows its CCP and California Health and Safety Code § 119402, in all material aspects.

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