

**CHARTER OF THE DISCLOSURE
COMMITTEE OF IMMUNITYBIO, INC.**

(As reviewed and approved on August 2, 2019 and further
amended on March 1, 2021 and December 22, 2025)

PURPOSE

The purpose of the Disclosure Committee (the “**Committee**”) of ImmunityBio, Inc. (the “**Company**”) is to consider the materiality of information and to determine disclosure obligations and to report such matters to the Chief Executive Officer (“**CEO**”) and Chief Financial Officer (“**CFO**” and, together with the CEO, “**Certifying Officers**”) with the goals of ensuring that (i) the information required in the Company’s reports filed with the U.S. Securities and Exchange Commission (“**SEC**”) is recorded, processed, summarized and reported on a timely and accurate basis; and (ii) other information communicated in the Company’s SEC reports, quarterly earnings press releases, and prepared statements for quarterly earnings calls, and other press releases and public statements, including but not limited to information concerning the Company’s drug development, clinical trials, compliance with Current Good Manufacturing Practices (“**cGMP**”), and interactions with the U.S. Food and Drug Administration (“**FDA**”) and similar foreign regulators, is not materially false or misleading. In furtherance of this purpose, the Committee shall design, adopt and implement procedures and policies in connection with the information-gathering and reporting process, including those set forth below.

COMMITTEE MEMBERSHIP AND ORGANIZATION

1. The Committee is established pursuant to the authority of the Certifying Officers and is intended to follow the suggestion of the SEC that is contained in SEC Release No. 33-8124, 34-46427 “Certification of Disclosure in Companies’ Quarterly and Annual Reports” to establish a disclosure committee.
2. The Committee shall be chaired by the General Counsel (“**GC**”), or as otherwise determined by the CEO and CFO. The Committee Chair’s responsibilities shall be to (a) preside over Committee meetings, (b) coordinate the activities and internal communication of the Committee, (c) call meetings of the Committee as appropriate, (d) coordinate communication with inside and/or outside legal counsel in a manner consistent with preserving the attorney-client privilege, (e) meet with the Audit Committee Chair, as deemed necessary by the Audit Committee Chair or the Disclosure Committee Chair, and (f) serve as the principal liaison between the Committee and the CEO and CFO, while implementing the information gathering and review processes in accordance with the requirements of this charter within the various business units or departments of the Company.
3. The members of the Committee shall be no fewer than four (4) officers of the Company from relevant developmental backgrounds, including the Company’s CEO, CFO, GC, and Chief Compliance Officer. Committee members shall consult with the Company’s management (including the Company’s Chief Operating Officer, Chief Medical Officer, and Senior Vice President of Regulatory Affairs), investor relations function, internal audit function, independent

auditors, inside and outside legal counsel, Audit Committee, and Board of Directors, as appropriate. Representatives of the Company's outside counsel, representatives of the Company's independent auditors and other personnel of the Company or representatives of its outside advisors may be invited to attend meetings of the Committee, as the Committee deems necessary or appropriate in performing its functions.

4. Changes to the membership of the Committee shall be determined by the CEO and CFO as necessary in light of changes in the Company's business, operations, organization or management.

COMMITTEE AUTHORITY

1. The Committee reports to the Certifying Officers, who, in consultation with legal counsel, maintain ultimate decision-making authority regarding the Company's external disclosures.
2. The Committee has the authority to retain separate and independent advisors at the Company's expense to provide advice and counsel concerning the Company's disclosure practices and public disclosure obligations.

COMMITTEE RESPONSIBILITIES

The Committee's responsibilities are to assist the Certifying Officers in:

1. Establishing and maintaining a process ("**Disclosure Controls**") designed to ensure that (a) information required to be disclosed by the Company in its filings with the SEC is recorded, processed, summarized and reported on a timely and accurate basis; and (b) that other information communicated in the Company's SEC reports, quarterly earnings press releases, prepared statements for quarterly earnings calls, and other press releases and public statements, including but not limited to information concerning the Company's drug development, clinical trials, compliance with cGMP, and interactions with the FDA and similar foreign regulators, is not materially false or misleading. Disclosure Controls will include sub-certifications in such form and to be executed by such persons determined by the Committee to be appropriate.
2. Consulting with the Company's internal audit function (if any) regarding the Company's internal controls.
3. Preparing and reviewing the Company's periodic filings with the SEC, including quarterly reports, annual reports, and proxy statements.
4. Evaluating and assessing the Company's Disclosure Controls as of the end of each fiscal quarter.
5. Documenting the procedures taken in preparing the quarterly, annual and current reports and proxy statements and evaluating the Company's Disclosure Controls.
6. Designing, adopting, and implementing appropriate procedures and policies, and monitoring these procedures and policies, to ensure (a) accurate and timely collection of information required to be disclosed by the SEC in the Company's periodic and current SEC reports and (b) other information communicated in the Company's SEC reports, quarterly earnings press releases, and prepared statements for quarterly earnings calls is not materially false or misleading.
7. Establishing responsibilities and review timelines relating to the preparation and filing of the

- Company's quarterly earnings press releases and periodic SEC reports.
8. Establishing as appropriate policies and procedures to ensure relevant Company personnel timely report to the Committee information potentially requiring disclosure.
 9. Establishing responsibility and lines of communication throughout the Company's operations and business units for collecting relevant information on a timely basis, including making periodic inquiries with relevant Company personnel possessing information potentially requiring disclosure.
 10. Meeting periodically during the preparation of quarterly earnings press releases and periodic SEC reports to discuss disclosure matters and filings made by the Company to ensure completeness and accuracy of content.
 11. Meeting at regular intervals to discuss matters potentially requiring disclosure in periodic SEC reports (including but not limited to prior to annual and quarterly SEC filings), current SEC reports or otherwise.
 12. Coordinating, as necessary, the review of quarterly earnings press releases and periodic and current SEC reports with the Certifying Officers, the Company's independent accountants, internal auditors (if any), outside counsel and the Audit Committee.
 13. Reporting quarterly to the Audit Committee regarding the Company's Disclosure Controls and the Committee's effectiveness, activities, and recommendations.
 14. Reporting annually to the Board regarding the adequacy of the Company's Disclosure Controls and the Disclosure Committee's effectiveness, activities, and recommendations.
 15. Reviewing the Disclosure Committee Charter annually.

MEETINGS

It is anticipated that the Committee will hold regular meetings as directed by the Certifying Officers or as the Committee otherwise deems appropriate, but the Committee shall meet at least four times per calendar year in connection with each annual and quarterly filing required by the Securities Exchange Act of 1934.