



Annual Declaration of Compliance

Overview

Pursuant to the State of California Health and Safety Codes sections 119400 – 119402, Verrica Pharmaceuticals Inc. (“Verrica” or the “Company”) has established a Comprehensive Compliance Program (the “Compliance Program”) based on applicable federal and state laws and regulations and the Compliance Program Guidance for Pharmaceutical Manufacturers published by the U.S. Department of Health and Human Services Office of Inspector General in April 2003 (the “OIG Guidance”). Verrica’s Compliance Program also includes policies that are consistent with the Pharmaceutical Research and Manufacturers of America Code on Interactions with Healthcare Professionals (the “PhRMA Code”), as well as other relevant laws and guidelines.

Verrica’s Compliance Program is intended to prevent, detect, and correct violations of law and Company policies and to encourage a culture of compliance that guides our interactions with healthcare providers, patients, and other customers. Verrica dedicated significant time and resources to establish this Compliance Program consistent with the OIG Guidance and tailored it to fit our unique environment and activities. Verrica regularly reviews and enhances the Compliance Program to meet its evolving compliance needs and the changing regulatory environment in which it operates.

Declaration

For purposes of complying with the California Health and Safety Code Sections 119400 to 119402, and as part of Verrica’s Compliance Program, the Company has an annual dollar limit of \$5,000 for spending on promotional materials, educational items, incidental meals, and other items or activities that it may provide to a healthcare professional (HCP) in California, as defined in the statute. Verrica reviews activities in scope for California on an annual basis and confirms that it has not exceeded its per-HCP annual dollar limit.

This annual aggregate limit is intended to establish an upper spending limit on items covered under the California statute and does not represent a goal. The limit may be revised at any time based on a variety of factors.

Consistent with California law, this annual spending limit does not include the value of: (1) drug samples given to physician and healthcare professional intended for free distribution to patients; (2) financial support of independent education including continuing medical education; (3) financial support for health education scholarships; and (4) payments made for legitimate professional services provided by a healthcare professional so long as the amount paid is based up the fair market value of the services provided.

You may obtain a copy (or copies) of this Annual Written Declaration of Compliance and Compliance Program by calling the toll-free telephone number 1-877-VERRICA or sending an e-mail to compliance@verrica.com. Verrica’s corporate governance documents, including this Annual Written Declaration of Compliance and Compliance Program Description, may be found at <https://verrica.com/corporate-governance/>.