

OVERVIEW OF VERRICA'S COMPLIANCE PROGRAM

Verrica is committed to maintaining the highest standards of business conduct, ethics, and integrity. Every Verrica director, officer, and employee (“personnel”) is responsible for acting in a lawful, ethical, and compliant manner whenever representing the Company.

The Compliance Program, together with the Code of Business Conduct and Ethics and departmental procedures, sets forth the principles and expectations that guide how we operate. All personnel are expected to read, understand, and adhere to these requirements. When local law is more restrictive than Company policy, personnel must follow the stricter standard.

Our policies cannot anticipate every scenario. In situations not expressly covered, personnel should rely on the guiding principles in our policies and procedures, the PhRMA Code, and Verrica’s commitment to transparency and integrity. When in doubt, personnel must seek appropriate guidance before acting.

1. Written Standards

The Code of Business Conduct and Ethics outlines Verrica’s core values and principles. Additional Company policies and procedures provide specific requirements for operations, interactions with HCPs, and promotional activities.

2. Leadership and Structure

Consistent with OIG Guidance (2023), Verrica has designated a Compliance Contact responsible for the day-to-day operation of the Compliance Program. The Compliance Contact reports compliance matters directly to the Compliance Committee, the Chief Executive Officer and, as appropriate, the Board of Directors. A cross-functional Compliance Committee of senior leaders supports oversight and administration of the Program.

3. Education and Training

Training is foundational to our Compliance Program. Verrica provides education on relevant laws, regulations, industry codes, Company policies, and the Compliance Program itself to ensure personnel understand their responsibilities.

4. Internal Lines of Communication

Verrica maintains confidential reporting channels, including a compliance hotline, and strictly prohibits retaliation against anyone who reports concerns in good faith. All forms of reporting, including whistleblowing, are protected.

5. Auditing and Monitoring

Verrica routinely monitors and/or audits activities, documentation, and processes to assess compliance with Company policies and identify opportunities for improvement.

6. Disciplinary Standards

Compliance with Company policies and the Code of Conduct is a condition of employment. Potential violations are investigated promptly, and appropriate corrective or disciplinary actions up to and including termination are taken when warranted.

7. Responding to Potential Violations

While a well-designed program reduces the risk of misconduct, no program is infallible. Verrica investigates potential violations of law or policy and implements corrective measures as needed to prevent, detect, and deter future issues.