

Arcutis Biotherapeutics, Inc.
California Declaration of Compliance
(Effective July 2026)

In accordance with the requirements of California Health & Safety Code §§ 119400-119402, Arcutis Biotherapeutics, Inc. (Arcutis) has established a Comprehensive Compliance Program (CCP), which contains the elements of an effective compliance program as defined in the “Compliance Program Guidance for Pharmaceutical Manufacturers,” developed by the United States Department of Health and Human Services Office of Inspector General. Arcutis’ CCP is also in compliance with the Pharmaceutical Research and Manufacturers of America (PhRMA) Code on Interactions with Health Care Professionals (HCPs).

Based on a good faith understanding of the regulation, Arcutis meets the requirements of California Health & Safety Code §§ 119400-119402 with an established program, anchored by our Code of Business Conduct & Ethics, that identifies a Chief Compliance Officer, develops and circulates written policies and procedures, documents training on those policies and procedures, maintains open lines of communication, engages in auditing and monitoring activities, has processes in place to detect and investigate any potential violations, and delivers appropriate disciplinary and corrective actions.

As part of its ongoing commitment to operate in an ethical and compliant manner, on an annual basis Arcutis assesses its CCP and makes changes as necessary to improve it. Additionally, Arcutis has established an annual aggregate limit of \$2,000 per HCP licensed in California for expenditures associated with various activities, such as meals provided in connection with promotional or informational discussions or scientific exchange, and educational items intended to enhance patient care. Excluded from this limit are drug samples, patient educational materials, financial support for continuing medical education forums or health educational scholarships, and fair market value payments made for legitimate contracted services provided by an HCP to Arcutis. This limit may be revised from time to time by Arcutis in its sole discretion, and currently applies to activities occurring from July, 2026 through June, 2027.

To obtain a copy of this declaration of compliance and/or a description of Arcutis’ CCP, please contact Arcutis at (805) 418-5006 or via email at information@arcutis.com.