

## More on the Aclaris Compliance Program

- Mission of the Compliance Program

The mission of the Compliance Program is to: (a) prevent, detect, and correct violations of law and Company policy and procedures; (b) ensure the establishment of compliance-related policies and procedures for business operations; (c) provide oversight for the development of training and other programs designed to educate employees regarding applicable policies, standards and codes; (d) implement a mechanism to evaluate the effectiveness of essential elements of the Compliance Program; (e) implement a mechanism for internal reporting to enable timely investigation and resolution; and (f) ensure appropriate corrective action is taken to prevent recurrence of misconduct.

- Governance and Dedicated Compliance Personnel

The Compliance Office is responsible for overseeing all aspects of the Company's Compliance Program, including, but not limited to, fielding questions or concerns with respect to potential violations of the Code of Conduct; developing and conducting periodic training on key areas of legal risk; developing and implementing monitoring systems; providing channels for employees, suppliers, agents, and customers to report suspected legal and ethics violations; and reporting compliance and ethics activities and issues as appropriate.

The Chief Compliance Officer leads the Compliance Program and promotes leadership and oversight through the Executive Compliance Committee.

- Written Policies and Procedures

Aclaris has implemented policies and procedures that provide colleagues with direction in their day-to-day activities including, but not limited to, our Code of Conduct. Aclaris has implemented the Pharmaceutical Research and Manufacturers of America (PhRMA) "Code on Interactions with Healthcare Professionals" (PhRMA Code).

- Effective Training and Education

Aclaris is committed to providing effective training to employees, managers, officers, directors and certain of our agents/consultants on our Compliance Program on an ongoing basis. Training is conducted via a variety of methods including online education and live classroom training.

- Effective Lines of Internal Communication

Fostering an environment that encourages open communication regarding our Code of Conduct, Company policies, or concerns about suspected improper business practices is important to Aclaris and forms a key aspect of our Company culture. There are multiple channels for raising and reporting compliance concerns.

### *Open Door Policy*

The Company has an "Open Door Policy" and colleagues' immediate resource for any matter related to the Code of Conduct is their supervisor. The Company encourages personnel to discuss issues, concerns, problems and suggestions with their immediate supervisors or other managers without fear of retaliation.

### *Compliance Helpline and Web-Reporting Tool*

The Aclaris Compliance Hotline can be reached by phone or online via the web-reporting tool. These resources are accessible 24 hours a day, 7 days a week, 365 days a year and are operated by specially trained third-party representatives:

**(844) 735-7386**

**[www.AclarisComplianceHotline.com](http://www.AclarisComplianceHotline.com)**

### *Contacting the Compliance Office*

The Compliance Office may also be contacted directly:

Email: [ComplianceOfficer@aclaristx.com](mailto:ComplianceOfficer@aclaristx.com)

Mail: Chief Compliance Officer  
Aclaris Therapeutics, Inc.  
640 Lee Road, Suite 200  
Wayne, PA 19087

Phone: (484) 324-7933 and ask for the Chief Compliance Officer

The Company prohibits retaliation against personnel who report or seek guidance on ethical or compliance issues. Reports must be made in good faith. "Good faith" does not mean that an individual must be right. The individual however, must have an honest belief that the information provided is truthful based on the existing information.

- Internal Monitoring and Auditing

Internal monitoring and auditing are vital parts of the Compliance Program. The Chief Compliance Officer identifies potential risk areas on which to focus Company auditing and monitoring activities. With our monitoring and auditing mechanisms, the Company can verify the efficient operation of its policies and practices, determine where enhancements can be made, and have the capability to detect and prevent deviations before, in certain circumstances, they grow into larger compliance concerns.

- Enforcement Through Appropriate Disciplinary Guidelines

Our Code of Conduct puts all personnel on notice that failure to adhere to our compliance standards may have disciplinary consequences, up to and including termination of employment. If an investigation suggests that discipline may be warranted, appropriate action is taken. The Company prohibits retaliation against personnel who report or seek guidance on possible ethical or compliance issues in good faith.

- Prompt Response and Corrective Action

Compliance concerns referred through any of the many communication channels (email, Compliance Hotline, etc.) will be carefully reviewed, thoroughly and thoughtfully investigated in a timely manner, and appropriately resolved. Upon conclusion of an internal investigation, corrective action and preventative measures will be determined and implemented as appropriate.