

	POLICY 138	PAGE: 1 of 6
	EFFECTIVE DATE: 08-JUN-2023	SUPERSEDES DATE: 08-FEB-2022

Reporting Violations of Company Policy and the Non-Retaliation Policy

**POLICY APPROVAL**

APPROVER: Compliance Officer	DocuSigned by:  <small>D0A25BE7A360425...</small>	Date: 6/8/2023
AUTHOR: Director, Compliance	DocuSigned by:  <small>F4E56B0530DC49B...</small>	Date: 6/8/2023

**1. PURPOSE**

This Reporting Violations of Company Policy and the Non-Retaliation Policy (“**Policy**”) describes how employees of Aclaris Therapeutics, Inc. (the “**Company**” or “**Aclaris**”) are obligated to report violations of the Aclaris Code of Business Conduct and Ethics (the “**Code**”) and how such employees are protected from retaliation for good faith efforts to do so.

Aclaris is committed to providing a workplace conducive to open discussion of our business practices and is committed to complying with the laws and regulations to which we are subject. Failure to maintain the highest standards of ethical business conduct can result in serious potential consequences for both the director, officer or employee as well as to Aclaris. Accordingly, the Company will not tolerate conduct that is in violation of such laws and regulations. As a result, you play a critical role in preventing unethical, illegal, or unsafe actions that could result in financial losses, reduced morale and/or create legal liability for Aclaris and its directors, officers and employees. Each Company employee is required to promptly report a good faith complaint regarding violations of the Code in accordance with the provisions of this Policy. Employees who file reports or provide information without a good faith, reasonable belief in the truth and accuracy of such information are not protected by this Policy and may be subject to disciplinary action. Any other third party, such as vendors, collaborators, partners, stockholders or competitors, also may report, under the procedures provided in this Policy, a good faith complaint regarding Code violations. In addition to workplace harassment issues, such activities could include, but are not limited to, conflicts of interest, impermissible gifts/bribery, breach of confidentiality, substance abuse, threats to personal safety, theft, inappropriate removal of Aclaris’ documents and/or property, making false or misleading entries in the Company’s books and records, noncompliance with the Company’s internal controls, inappropriate or unauthorized use of Aclaris’ electronic information systems or systems equipment, non-compliance with applicable governmental rules and regulations, and not providing complete, fair, accurate, timely and understandable disclosure in periodic mandated filings for Aclaris.

Management sets an example for other employees and is often responsible for directing the actions of others. As such, management has a special duty to take necessary actions to

CONFIDENTIAL

	POLICY 138	PAGE: 2 of 6
	EFFECTIVE DATE: 08-JUN-2023	SUPERSEDES DATE: 08-FEB-2022

ensure compliance, provide guidance, and assist employees in resolving questions concerning the Code and this Policy. Management must also permit employees to express any concerns regarding compliance with the Code. No one has authority to order another employee to act contrary to the Code.

To facilitate the reporting of potential violations of the Code, the Audit Committee of our Board of Directors (the “**Audit Committee**”) has established procedures for (i) the receipt, retention and treatment of complaints regarding potential violations of the Code and (ii) the confidential, anonymous submission by Company employees of concerns regarding potential violations of the Code. This Policy is a supplement to the Code and should be read in conjunction with the Code.

## 2. SCOPE

This Policy applies to all Aclaris employees and contractors worldwide, including officers (collectively, “**Aclaris Personnel**”) and the Board of Directors. We expect all Aclaris Personnel to read and understand this Policy and its application to all relevant activities.

## 3. RESPONSIBILITIES

All Aclaris Personnel are responsible for adhering to the scope of this Policy.

## 4. POLICY

### A. OBLIGATION TO MAKE REPORTS AND PROCEDURES

If you have any information or knowledge regarding the existence of any violation or suspected violation of the Code, you have a duty to report in good faith the violation or suspected violation to your supervisor, the Compliance Officer, a regulatory agency, or the Compliance Hotline or Web-Reporting Tool, as set forth in the Code. Failure to make a good faith report of suspected or actual violations is itself a violation of the Code. To the extent any investigation is necessitated by a report, Aclaris will endeavor to keep the proceedings and your identity confidential to the fullest extent permitted by applicable law and the surrounding circumstances.

We have established a procedure under which employee concerns regarding potential violations of the Code may be reported anonymously. Employees may anonymously report these concerns to either (i) our Compliance Hotline at (844) 735-7386, (ii) our Compliance Web-Reporting Tool at [www.AclarisComplianceHotline.com](http://www.AclarisComplianceHotline.com) or (iii) by delivering the complaint via regular mail to the Compliance Officer at 640 Lee Road, Suite 200, Wayne, PA 19087. The complaint procedure is specifically designed so that employees have a mechanism that allows the employee to bypass a supervisor he/she/it believes is engaged in prohibited conduct under the Code. Anonymous reports should be factual, instead of speculative or conclusory, and should contain as much specific information as possible to allow the Compliance Officer and other persons investigating the report to adequately assess the nature, extent and urgency of the investigation.

CONFIDENTIAL

	POLICY 138	PAGE: 3 of 6
	EFFECTIVE DATE: 08-JUN-2023	SUPERSEDES DATE: 08-FEB-2022

The Audit Committee has appointed a Compliance Officer who is responsible for administering this Policy. Our Compliance Officer may be reached at [ComplianceOfficer@aclaristx.com](mailto:ComplianceOfficer@aclaristx.com). The Compliance Officer is responsible for receiving and reviewing and then investigating (under the direction and oversight of the Audit Committee) complaints under this Policy. If the suspected violation involves the Compliance Officer, the employee should instead report the suspected violation to a member of the Audit Committee.

## B. ANTI-RETALIATION POLICY

If you report in good faith a suspected violation under the Code by Aclaris (or its agents acting on behalf of Aclaris) or raise issues or concerns regarding Aclaris' business or operations as set forth in this Policy, you may not be fired, demoted, reprimanded or otherwise harmed based on your reporting of the suspected violation, issues or concerns. In addition, if you report in good faith a suspected violation under the Code which you reasonably believe constitutes a violation of a federal statute by Aclaris, or its agents acting on behalf of Aclaris, to a federal regulatory or law enforcement agency, you may not be reprimanded, discharged, demoted, suspended, threatened, harassed or in any manner discriminated against in the terms and conditions of your employment based on the reporting of the suspected violation, regardless of whether the suspected violation involves you, your supervisor or senior management of Aclaris. If you bring your complaint to an outside regulator or other governmental entity, you will be protected by the terms of this Policy just as if you directed the complaint to the Executive Compliance Committee, Audit Committee, Compliance Officer, and/or the Compliance Hotline or Compliance Web-Reporting Tool. Executives are subject to criminal penalties, including imprisonment, for retaliation against whistleblowers.

This anti-retaliation pledge will protect you for your good faith reporting of the suspected or actual violation but does not extend protection or provide a defense in the event of your own poor performance or violation or breach of the Code or the policies set forth in Aclaris' policies or employee, consultant, and/or agent agreements.

If an employee is subject to an adverse employment decision as a result of whistleblowing, the employee may file a complaint with the Department of Labor consistent with the law in the applicable jurisdiction (a failure to report such claims does not foreclose any other available legal remedy).

## C. FREQUENTLY ASKED QUESTIONS AND ANSWERS

The following questions and answers address your obligation to comply with the Code and this Policy. Aclaris has attempted to design procedures that ensure maximum confidentiality and, most importantly, freedom from the fear of retaliation for complying with the Code and/or reporting violations.

CONFIDENTIAL

	POLICY 138	PAGE: 4 of 6
	EFFECTIVE DATE: 08-JUN-2023	SUPERSEDES DATE: 08-FEB-2022

**Q: How do I report violations or suspected violations of the Code?**

A: If you know or learn of any breach of the Code, you are obligated to report violations to your supervisor, the Compliance Officer, a regulatory agency, or the compliance hotline or web-reporting tool, as set forth in the Code.

**Q: Do I have a duty to report violations under the Code?**

A: Yes, participation in the Code and in its compliance program is mandatory. You must immediately report any suspected or actual violation of the Code. Aclaris will keep reports confidential to the fullest extent required by applicable law. Failure to report suspected or actual violations is itself a violation of the Code and may subject you to disciplinary action, up to and including termination of employment or legal action.

**Q: I'm afraid of being fired for raising questions or reporting violations under the Code. Will I be risking my job if I do?**

A: The Code contains a clear non-retaliation policy, meaning that if you in good faith report a violation of the Code by Aclaris or its agents in accordance with the Code, Aclaris will undertake to protect you from being fired, demoted, reprimanded, or otherwise harmed based on the reporting of the suspected violation, even if the violation involves you, your supervisor, or senior management of Aclaris. You are entitled to make the report on a confidential and anonymous basis. To the extent any investigation is necessitated by a report, Aclaris will endeavor to keep the proceedings and your identity confidential to the fullest extent permitted by applicable law and the surrounding circumstances.

In addition, if you report a suspected violation under the Code that you reasonably believe constitutes a violation of a federal statute by Aclaris or its agents to a federal regulatory or law enforcement agency, you may not be reprimanded, discharged, demoted, suspended, threatened, harassed or in any manner discriminated against in the terms and conditions of your employment based on the reporting of the suspected violation, regardless of whether the suspected violation involves you, your supervisor or senior management of Aclaris. If you bring your complaint to an outside regulator or other governmental entity, you will be protected by the terms of this Policy just as if you directed the complaint to the Executive Compliance Committee, Audit Committee, Compliance, and/or the Compliance Hotline or Compliance Web-Reporting Tool. Executives are subject to criminal penalties, including imprisonment, for retaliation against whistleblowers.

**Q: What if I have been retaliated against for reporting a violation under the Code?**

A: If an employee is subject to an adverse employment decision as a result of whistleblowing, the employee may file a complaint with the Department of Labor consistent with the law in the applicable jurisdiction (a failure to report such claims does not foreclose any other available legal remedy).

CONFIDENTIAL

	POLICY 138	PAGE: 5 of 6
	EFFECTIVE DATE: 08-JUN-2023	SUPERSEDES DATE: 08-FEB-2022

**Q: How are suspected violations investigated under the Code?**

A: When you report a suspected violation, Compliance will gather information about the allegation by interviewing you, the employee who is connected to the alleged violation, and/or any co-workers or others to determine if a factual basis for the allegation exists. Your immediate supervisor will not be involved in the investigation if the reported violation involved that supervisor. Aclaris will keep your identity confidential to the fullest extent required by applicable law.

If the report is not substantiated, you will be informed and at that time will be asked for any additional information not previously communicated. If there is no additional information, the matter will close as unsubstantiated. If the allegation is substantiated, a recommendation on the degree of disciplinary action based on the degree of severity of the violation will be communicated to the appropriate member of management for discussion with the employee connected to the matter. In more severe cases, the Audit Committee will be involved in the disciplinary action decision. The Compliance Officer's or Audit Committee's decision, as applicable, as to disciplinary and corrective action will be final.

Compliance will maintain a log of all complaints, tracking their receipt, investigation and resolution. Compliance will provide a summary of all matters considered under the Code to the Executive Compliance Committee, the Audit Committee and the Board of Directors at each regular meeting of such committees and the Board. Each member of the Audit Committee and, at the discretion of the Compliance Officer, other personnel involved in the investigation of complaints, shall have access to the log. Copies of the log and all documents obtained or created in connection with any investigation will be maintained in accordance with our Records Retention and Disposal Policy.

**Q: Do I have to participate in any investigation under the Code?**

A: Your full cooperation with any pending investigation under the Code is a condition of your continued relationship with Aclaris. The refusal to cooperate fully with any investigation is a violation of the Code and grounds for discipline, up to and including termination.

**Q: What are the consequences of violating the Code?**

A: Employees that violate the Code may be subject to discipline, up to and including termination of employment. Employees that violate the Code may simultaneously violate federal, state, local or foreign laws or regulations, Company policies or their employment, consulting, or agency agreement. Such employees may also be subject to prosecution, imprisonment and fines, and may be required to make reimbursement to Aclaris, the government or any other person for losses resulting from the violation. They may be subject to punitive or treble damages depending on the severity of the violation and applicable law.

CONFIDENTIAL

	POLICY 138	PAGE: 6 of 6
	EFFECTIVE DATE: 08-JUN-2023	SUPERSEDES DATE: 08-FEB-2022

**Q: What if I have questions under the Code or want to obtain a waiver under any provision of the Code?**

A: The Compliance Department can help answer questions you may have regarding the Code. The Code provides information on how you may obtain a waiver from the Code, which will be granted only in very limited circumstances. You should never pursue a course of action that is unclear under the Code without first consulting the Compliance Department and, if necessary, obtaining a waiver from the Code.

**5. REVISION HISTORY**

- 5.1. Version 2.0 (effective 10-NOV-2021)
  - 5.1.1. Updated to include additional information regarding employee rights when acting under the policy.
  - 5.1.2. Added FAQ section.
- 5.2. Version 3.0 (effective 08-FEB-2021)
  - 5.2.1. Changed Compliance Officer
- 5.3. Version 4.0 (effective 08-Jun-2023)
  - 5.3.1. Updated Compliance contact information and updated select references from Compliance Officer to Compliance.