I. PURPOSE

Arcutis Biotherapeutics, Inc. (collectively with its subsidiaries, the "Company") is committed to promoting high standards of ethical business conduct and compliance with applicable laws, rules and regulations. As part of this commitment, the Company has adopted this Whistleblower and Complaint Policy (this "Policy"). Employees are encouraged to use the guidance provided by this Policy to report all known and suspected improper activities. Any attempts to abuse this Policy for personal gain or frivolous reports will be subject to discipline, up to and including termination. This Policy is designed to provide employees with a confidential or anonymous method for reporting any improper activities that are reasonably construed as likely acts of misconduct.

II. SCOPE

This Policy applies to all Company employees, contingent workers (including independent contractors, interns, and temporary employees), and any authorized Third Parties acting on behalf of the Company.

III. POLICY

1. REPORTING VIOLATIONS

1.1. Employees should report known and suspected violations of (a) laws, governmental rules and regulations, (b) internal accounting controls or accounting and auditing practices and policies, or (c) any Company policies, to their supervisors and managers. This includes complaints or reports received from persons outside the Company and complaints regarding third parties who provide services to the Company. Supervisors and managers shall promptly provide any such information to the Company's Compliance Officer as designated in the Company's Code of Conduct and Ethics who shall then consider the information submitted to them and take appropriate action in accordance with the law, governmental rules and regulations and otherwise consistent with good business practice. The Compliance Officer will provide any complaints or reports of known or suspected violations to the Chairperson of the Audit Committee of the Company's Board of Directors (the "Chair").

1.2. If an employee is not comfortable discussing the suspected violation with any of their direct supervisors or managers, the employee may report the suspected violation confidentially and anonymously to the Compliance Officer by the following means:

- By calling the Company's compliance hotline: From within the United States and Canada, toll-free at +1-833-976-2011; or

- By the company's whistleblower website https://www.whistleblowerservices.com/ARQT. Note: If you choose to report by the website and wish to remain anonymous, please take appropriate steps to ensure your anonymity is maintained.

- Arcutis will test the Company's compliance hotline and whistleblower website once every calendar quarter. Results of the Company's testing will be reported to the Audit Committee.

- If you wish to report a matter directly to the Audit Committee, you may send an email to the Audit Committee chair at auditcommittee@arcutis.com or you may send a letter addressed to the Company's corporate headquarters marked "Attention: Audit Committee."

1.3. Any employee reporting a suspected violation is encouraged to provide as much detail as possible regarding the subject matter of the complaint or concern because the ability to investigate will be largely dependent on the quality and specificity of such information. The Audit Committee will be responsible for reviewing, or overseeing the review, of any report of a suspected violation from any source. The Audit Committee will take whatever steps it deems necessary to respond to a report that it receives, which may include referring the matter to the Compliance Officer for investigation.

2. STATEMENT OF NON-RETALIATION

2.1. It is against Company policy, and in some countries a crime, for anyone to intentionally retaliate against any person who provides truthful information to their manager, the Compliance Officer, the Audit Committee, or a law enforcement official concerning such person's reasonable good faith belief that a possible violation of any Company policy, or any federal, state or foreign law or regulation, has occurred. Moreover, the Company will not permit any form of intimidation or retaliation by any employee, contractor, subcontractor or agent of the Company against any employee because of any lawful act done by the employee to:

- provide information, cause information to be provided or otherwise assist in an investigation regarding any conduct which the employee reasonably believes constitutes a violation of laws, rules, regulations or any Company policies; or

- file, cause to be filed, testify, participate in or otherwise assist in a proceeding filed or to be filed relating to a violation of any law, rule or regulation.

2.2. The prohibited forms of intimidation or retaliation include, but are not limited to, discharge, demotion, suspension, threats, harassment or any other manner of discrimination with respect to an employee's terms or conditions of employment based on lawful actions of such employee with respect to a good faith report or cooperation or assistance with an investigation conducted by the Company.

3. STATEMENT OF CONFIDENTIALITY

3.1. In cases in which an employee reports a suspected violation in good faith and is not engaged in the questionable conduct, the Company will attempt to keep its discussions and actions confidential to the greatest extent possible and in compliance with applicable laws and regulations governing employee privacy. All reports and records associated with complaints or reports made under this Policy are considered Company confidential information and access will be restricted to members of the Board of Directors, the Company's legal counsel and others involved in investigating a complaint or report under this Policy. Access to reports and records may be granted to other parties at the discretion of the Audit Committee.

4. INVESTIGATION AND RECORD KEEPING

4.1. Employees should not independently conduct their own investigation but instead should make their complaint or report to their supervisor or manager, or by following the procedures in this Policy. The Compliance Officer will review all complaints and reports of a suspected violation and will coordinate the investigation and resolution of all such complaints and reports to ensure that corrective action, as necessary and appropriate, is taken.

4.2. The Compliance Officer (or his or her designee(s)) will maintain a log of all complaints and reports, tracking their receipt, investigation and resolution. The Company will preserve records of complaints and reports made under this Policy and associated log(s) for a period of time to be determined by the Compliance Officer. After the established retention period, the records and associated log(s) may be disposed of in accordance with Company policy.

5. REPORTING TO THE AUDIT COMMITTEE

5.1. The Compliance Officer will report to the Audit Committee on the nature of any findings related to reports of suspected violations received by the Compliance Officer since the previous meeting of the Audit Committee. If the Compliance Officer determines that reporting prior to the next scheduled Audit Committee meeting is necessary or appropriate, the Compliance Officer shall contact the Audit Committee Chair, or such other person designated by the Audit Committee, to decide whether an earlier evaluation is warranted.

6. POLICY ADMINISTRATION

6.1. The Audit Committee is responsible for reviewing this Policy and confirming that the procedures contained in this Policy are in place. It may request reports from Company executives about the implementation of this Policy and take any other steps in connection with that implementation as it deems necessary. The Audit Committee may amend this Policy and procedures associated with this Policy at its discretion.

IV. DOCUMENT HISTORY

Version	Effective Date	Change History
2.0	09 NOV 2026	Periodic review.
1.0	04 JAN 2020	New document.