

**Dermira**  
**California Comprehensive Compliance Program Declaration**  
(As required by the California Health & Safety Code section 11904)

**Dermira Healthcare Compliance Program**

Dermira, Inc. (Dermira or the company) is focused on the need for important new treatments for chronic skin conditions, we are looking deeper to bring biotech ingenuity to medical dermatology. Dermira is committed to conducting its business activities with integrity and in compliance with applicable laws, regulations, industry codes of conduct, and Dermira's Healthcare Compliance Program. Dermira's compliance policies are intended to further this commitment by providing an overview of the laws, regulations, and Dermira policies and guidelines that govern Dermira's business practices.

To conduct our business with integrity and ethically, Dermira has established a Healthcare Compliance Program which serves as a Comprehensive Compliance Program in California. This program has been developed in accordance with the laws applicable to our industry, the "Program Guidance for Pharmaceutical Manufacturers" published by the Office of the Inspector General of the U.S. Department of Health and Human Services and the Code of Interactions with Healthcare Professionals of the Pharmaceutical Research and Manufacturers of America (PhRMA).

Consistent with the OIG Guidance Dermira's compliance program includes:

**Compliance Leadership**

Dermira has a Compliance Officer who is responsible for overseeing Dermira's Healthcare Compliance Program, including responsibilities for developing, operating, and monitoring the compliance program. The Compliance Officer reports on a regular basis to the Board of Directors and CEO.

Dermira has also established an Executive Compliance Steering Committee to provide oversight and support to the ongoing implementation and maintenance of the Healthcare Compliance Program.

**Written Standards**

Dermira has adopted compliance policies that guide the company's day-to-day operations and set forth the expectations for all subject employees and agents of the company, including policies that govern Dermira employee interactions with healthcare professionals in accordance with the U.S. Department of Health and Human Services Office of Inspector General's Compliance Program Guidance for Pharmaceutical Manufacturers ("OIG Compliance Program Guidance") and the Pharmaceutical Research and Manufacturers of America Code on Interactions with Healthcare Professionals ("PhRMA Code").

**Annual Spend Limit for California Healthcare Professionals**

Dermira has adopted policies and procedures that help ensure that the company operates in accordance with the OIG Compliance Program Guidance and the PhRMA Code guidelines. Dermira has also established a total annual dollar limit on items of value (including meals), and

activities that Dermira may provide to a California-licensed healthcare professional in accordance with Section 119402 of the California Health & Safety Code. Dermira's established annual aggregate limit per California healthcare professional is \$2500, which applies to Dermira as a company. This annual limit may be revised by Dermira from time to time.

The following are exempt from counting towards Dermira's annual aggregate dollar limit:

- Drug samples given to healthcare professionals for free distribution to patients;
- Financial support for CME programs;
- Financial support for health educational scholarships; and
- Fair market value payments provided for a healthcare professional's professional services (e.g., consulting activities).

### **Education and Training**

Dermira is committed to effectively educating and training its employees, managers, officers, and agents, including the sales and marketing staff, on the company's marketing code of conduct and related compliance policies. New employees receive training as part of their initial onboarding and existing employees receive compliance training on at least an annual basis. Dermira also periodically reviews and updates its training programs to identify any potential new areas for training and to ensure the program aligns with Dermira's compliance policies.

### **Effective Lines of Communication**

Dermira maintains an open line of communication between the Compliance Department and all Dermira employees. Dermira expects employees, agents, and vendors who do business with the company to report concerns over possible misconduct, potential conflicts, or known violations of the compliance policies and/or other company policies and procedures to their supervisors, managers, or to the Compliance Department.

Dermira employees may contact the Compliance Department directly in any of the following methods:

- Email: [hccpcompliance@dermira.com](mailto:hccpcompliance@dermira.com)
- Mail: 275 Middlefield Rd. Suite 150 Menlo Park, CA 94025
- Phone: 650-422-7797

Dermira also established an anonymous system to receive complaints or for employees to seek information or advice on questions anonymously via its Compliance Hotline at 866-354-3854.

We also encourage our employees, officers, and agents to ask questions about any activity where they are unclear about a potential violation or application of our Compliance Program. Questions may be addressed through any of the established channels described above.

Dermira has also adopted procedures to protect the anonymity of complainants and to protect whistleblowers from retaliation. Dermira does not permit acts of retaliation or retribution against an employee or officer who in good faith reports a potential, suspected, planned or actual

violation or application of Dermira's compliance policies and any such actions will be dealt with appropriately.

### **Auditing and Monitoring**

Dermira's Compliance Department has the responsibility of developing a plan for auditing and monitoring compliance with the company's compliance policies and implementation of such policies and other guidelines or practices. Through these audits, the Compliance Department can identify potential or existing problems or areas of concern and take corrective action in an effort to prevent the recurrence of non-compliance as needed. The nature of these audits and reviews, the extent of the audits, and the frequency with which the Compliance Department performs such audits varies due to a variety of factors, including new regulatory requirements, changes in company practices, and other relevant considerations.

### **Enforcing Standards through Well-Publicized Disciplinary Guidelines**

Dermira's compliance policies and procedures put employees and agents, including management, on notice that noncompliance will have disciplinary consequences, up to and including termination of employment.

### **Responding to Potential Violations and Corrective Action Procedures**

Dermira's Compliance Department oversees the review and investigation of noncompliance reports and/or allegations and suspected cases of misconduct brought to the Compliance Department's attention.

Dermira is committed to taking steps to correct misconduct, which may include administering discipline, up to and including dismissal, where necessary. Dermira's Compliance Officer oversees implementation of corrective measures in response to findings of noncompliance, such as retraining, increased monitoring, and warnings.

## **CALIFORNIA 2018 ANNUAL DECLARATION OF COMPLIANCE**

In accordance with California Health & Safety Code sections 119400 and 119402, Dermira believes that it has adopted a compliance program as required by California law that is in accordance with the OIG Compliance Program Guidance, consistent with the PhRMA Code guidelines, and includes an annual limit for certain items and activities given to healthcare professionals covered by this California law. As of the date of the declaration, Dermira believes that it is in compliance with the company's compliance policies and California requirements in all material respects.

To the best of our knowledge, as of October 01, 2018, Dermira is in material compliance with its Comprehensive Compliance Program and the requirements of the California Health & Safety Code section 119402.

To obtain a copy of this declaration and certification please call the V.P., Compliance Officer, Gary Thompson, who can be reached at 650-422-7797 or via email at [hccpcompliance@dermira.com](mailto:hccpcompliance@dermira.com).