

# REVANCE THERAPEUTICS, INC.

## WHISTLEBLOWER POLICY

LAST REVISED: AUGUST 25, 2023

### Statement of Policy

Revanche Therapeutics, Inc. and its subsidiaries (collectively, the “*Company*”) 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. Accordingly, the Company will not tolerate conduct that is in violation of such laws and regulations. Each Company employee, including employees of our subsidiaries, is encouraged to promptly report a good faith complaint regarding accounting, internal accounting controls, or auditing matters (“*Accounting Matters*”) or ethical conduct matters related to violations of the Company’s Code (“*Ethical Conduct Matters*”) in accordance with the provisions of this policy and the Company’s Code of Business Conduct and Ethics (the “*Code*”). 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 consultants, vendors, customers, stockholders or competitors, also may report, under the procedures provided in this policy, a good faith complaint regarding accounting or auditing matters. To facilitate the reporting of complaints regarding Accounting or Ethical Conduct Matters, the Audit Committee of our Board of Directors (the “*Audit Committee*”) has established procedures for the confidential, anonymous submission by Company employees regarding Accounting and Ethical Conduct Matters and the receipt, retention and treatment of such concerns or complaints. This policy is a supplement to the Code and should be read in conjunction with the Code.

### Scope of Accounting and Ethical Conduct Matters Covered by Policy

This policy covers complaints relating to Accounting and Ethical Conduct Matters including, without limitation, the following types of conduct:

- conduct that does not reflect the highest standards of honesty and integrity;
- violations of domestic or foreign laws, rules or regulations, including securities, regulatory, antitrust and environmental laws;
- conflicts of interest that may interfere in any way with the performance of an employee’s duties or responsibility to act within the best interests of the Company;
- utilization of an employee’s role within the Company or use of corporate property or information for improper personal gain;
- unethical or illegal business practices that seek to gain an advantage over competitors, even if motivated by an intention to advance the Company’s interests;
- acceptance of gifts or entertainment outside of guidelines as set forth in the Code or which may affect the judgement or performance of an employee;

- fraud, deliberate error, gross negligence or recklessness in the preparation, evaluation, review or audit of any financial statement of the Company;
- fraud, deliberate error, gross negligence or recklessness in the recording and maintaining of financial records of the Company;
- deficiencies in, or noncompliance with, the Company's internal accounting controls;
- misrepresentation or false statement to management, regulators, the outside auditors or others or by a senior officer, accountant or other employee regarding a matter contained in the financial records, financial reports or audit reports of the Company; or
- deviation from full and fair reporting of the Company's results or financial condition.

### **Retaliation Strictly Prohibited**

It is the Company's policy to comply with all applicable laws that protect our employees (including the employees of our subsidiaries) against unlawful discrimination or retaliation by us or our agents as a result of their lawfully reporting information regarding, or their participation in, investigations involving Accounting and Ethical Conduct Matters. If any employee believes he or she has been subjected to any harassment, threat, demotion, discharge, discrimination or retaliation by the Company or its agents for reporting in good faith complaints regarding Accounting and Ethical Conduct Matters in accordance with this policy, he or she may file a complaint with our Compliance Officer or the Company's Human Resources department. If it is determined that an employee has experienced any improper employment action in violation of this policy, we endeavor to promptly take appropriate corrective action.

### **Compliance Officer**

The Board of Directors ("**Board**") has appointed a Compliance Officer who is responsible for administering this policy. The Compliance Officer is the Company's General Counsel. If an employee has a complaint under this policy, including regarding an Accounting or Ethical Conduct Matter, he or she should report such matter to the Chair of the Audit Committee, at [AuditChair@revance.com](mailto:AuditChair@revance.com), and the Compliance Officer. For options on reporting a matter anonymously, please refer to the section "Anonymous Reporting of Complaints" below. If the suspected violation involves the Compliance Officer, the employee should instead report the suspected violation directly and solely to the Chair of the Audit Committee or request that the complaint be forwarded in confidence directly and solely to the Chair of the Audit Committee. Except for complaints involving the Compliance Officer or requested by an employee to be forwarded in confidence directly and solely to the Chair of the Audit Committee, the Chair of the Audit Committee and the Compliance Officer shall receive and review complaints under this policy with the Compliance Officer then investigating (under the direction and oversight of the Audit Committee) complaints under this policy.

## Anonymous Reporting of Complaints

We have also established a procedure under which complaints regarding Accounting and Ethical Conduct Matters may be reported confidentially and anonymously. Employees may anonymously report these concerns using one of the following options:

- the Company's Compliance Hotline, a toll-free help line at 833-984-7568 (which is available 24 hours a day and seven days a week);
- a dedicated email address at [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com) (must include company name with report);
- a dedicated website at: <https://www.lighthouse-services.com/revance> ;
- or by delivering the complaint via regular mail to the Compliance Officer at Revance.

Employees should make every effort to report their concerns using one or more of the methods specified above. The complaint procedure is specifically designed so that employees have a mechanism that allows the employee to bypass a supervisor he or she believes is engaged in prohibited conduct under this policy or the Code. These methods of reporting shall be published on the Company's internal website and/or through other means of internal Company communication, in such manner as the Compliance Officer and the Chair of the Audit Committee deems appropriate.

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. Examples of important information to include, if available are: (i) a description of the matter or irregularity, (ii) the persons involved and any witnesses, (iii) the period of time during which the person observed the matter or irregularity, and (iv) any steps that the reporting person has taken to investigate the matter or irregularity, including reporting to a supervisor and the supervisor's response. The person submitting the complaint may include, at their option, their identity and contact information, which may be used if additional information is needed. As stated above, however, there is no requirement that the report contain this information if the reporting person chooses to remain anonymous. Please note, however, that if the reporting person does not provide contact information and the report does not provide enough information to enable an investigation of the matter, the reported matter may not be fully investigated. Therefore, it is important that all reports be as complete and thorough as possible.

Nothing in this policy is meant to prevent any employee from reporting information to federal or state law enforcement agencies when an employee has reasonable cause to believe that the violation of a federal or state statute has occurred. A report to law enforcement, regulatory or administrative agencies may be made instead of, or in addition to, a report directly to the Company as provided in this policy.

## **Policy for Receiving and Investigating Complaints**

Except for complaints sent directly and solely to the Chair of the Audit Committee or requested by an employee to be forwarded in confidence directly and solely to the Chair of the Audit Committee, upon receipt of a complaint, the Chair of the Audit Committee and the Compliance Officer will determine whether the information alleged in the complaint pertains to an Accounting or Ethical Conduct Matter. The full Audit Committee shall be notified promptly of all complaints determined to pertain to an Accounting or Ethical Conduct Matter and shall determine the planned course of action with respect to the complaint, including determining that an adequate basis exists for commencing an investigation. The Compliance Officer will then appoint one or more internal and/or external investigators to promptly and fully investigate each viable claim under the direction and oversight of the Audit Committee or such other persons as the Audit Committee determines to be appropriate under the circumstances. The Compliance Officer will confidentially inform the reporting person (if his or her identity is known) that the complaint has been received and provide him or her with the name of, and contact information for, the investigator assigned to the claim.

If the investigation confirms that a violation has occurred, the Company will promptly take appropriate corrective action (as determined by the Audit Committee, the Compliance Officer and/or other department head, as applicable) with respect to the persons involved, including discipline up to and including termination, and, in appropriate circumstances, referral to governmental authorities, and will also take appropriate steps to correct and remedy any violation. The Company shall act appropriately to prevent further similar conduct, including assessing the Company's policies, Code and making modifications necessary to ensure such programs are effective.

Confidentiality of the individual submitting the complaint will be maintained to the fullest extent possible, consistent with the need to conduct an adequate investigation. In the course of any investigation, the Company may find it necessary to share information with others on a "need to know" basis. When appropriate, the Compliance Officer or Chair of the Audit Committee will report the results of any investigation regarding a complaint, including any corrective actions taken, to the individual submitting the complaint, if appropriate information for response was supplied, maintaining the anonymity of the person making the complaint to the fullest extent possible.

## **Retention of Complaints**

The Compliance Officer will maintain a log of all complaints under this policy, tracking their receipt, investigation and resolution, and shall prepare a periodic summary report thereof for each member of the Audit Committee. Reports regarding Accounting Matters shall be logged separately from Ethical Conduct Matter reports. 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 document retention policy.

## **Modification of Policy**

The Audit Committee is committed to periodically reviewing and updating its policies and procedures. The Audit Committee or the Board of Directors of the Company can modify this policy unilaterally at any time without notice. Modification may be necessary, among other reasons, to maintain compliance with state and federal regulations and/or accommodate organizational changes within the Company.