

# REVANCE THERAPEUTICS, INC.

## INSIDER TRADING AND TRADING WINDOW POLICY

EFFECTIVE: SEPTEMBER 21, 2023

### I. INTRODUCTION

This policy determines acceptable transactions in the securities of Revance Therapeutics, Inc. (the “*Company*”) by the directors, officers, employees and consultants of the Company and its subsidiaries. During the course of your employment, directorship, officership or consultancy with the Company, you may receive important information that is not yet publicly available (“*inside information*”), about the Company or about other companies with which the Company has business dealings. Because of your access to this inside information, you may be in a position to profit financially by buying or selling, or in some other way dealing, in the Company’s stock, or stock of another company, or to disclose such information to a third party who does so profit (a “*tippee*”).

This policy also applies to any immediate family members of each director, officer, employee and consultant of the Company and its subsidiaries and other persons that live in his or her household, any family members who do not live in his or her household, but whose transactions in Company securities are directed by such director, officer, employee or consultant or are subject to his or her influence or control (such as parents or children who consult with him or her before trading in Company securities), and any entity controlled, or whose securities transactions are directed, influenced or controlled, by such director, officer, employee or consultant of the Company.

### II. INSIDER TRADING POLICY

#### A. *Securities Transactions*

Use of inside information by someone for personal gain, the purchase or sale of securities of companies while aware of material, nonpublic information or to pass on, or “tip,” the inside information to someone who uses it for personal gain, is illegal, regardless of the quantity of stock, and is therefore prohibited. You can be held personally liable both for your own transactions and for transactions effected by a tippee, or even a tippee of a tippee. Such trading violations by individuals are pursued vigorously by regulatory authorities and may expose you to significant civil and criminal penalties. Furthermore, it is important that the appearance of insider trading in securities be avoided.

#### B. *Inside Information*

As a practical matter, it is sometimes difficult to determine whether you possess inside information. The key to determining whether nonpublic information you possess is inside information is whether dissemination of the information would likely affect the market price of the company’s stock or would likely be considered important, or “material,” by investors who are

considering trading in that company's stock. Certainly, if the information makes you want to trade, it would probably have the same effect on others. Remember, both positive and negative information can be material. If you possess inside information, you may not trade in a company's stock, advise anyone else to do so or communicate the information to anyone else until you know that the information has been publicly disseminated. This means that in some circumstances, you may have to forego a proposed transaction in a company's securities even if you planned to execute the transaction prior to learning of the inside information and even though you believe you may suffer an economic loss or sacrifice an anticipated profit by waiting. "**Trading**" includes engaging in short sales, transactions in put or call options, hedging transactions and other inherently speculative transactions.

Although by no means an all-inclusive list, information about the following items may be considered to be inside information until it is publicly disseminated:

- (a) financial results or forecasts;
- (b) sales results or forecasts, including clinician and ordering patterns;
- (c) payer reimbursement decisions;
- (d) major new products or processes;
- (e) mergers, acquisitions or dispositions of assets, divisions, companies, etc. or joint ventures, including while pending or proposed;
- (f) pending public or private sales of debt or equity securities;
- (g) financing transactions, significant borrowings or a change in debt ratings;
- (h) other events regarding the Company's securities (such as defaults on senior securities, calls of securities for redemption, repurchase plans, stock splits, dividends or changes in dividend policy or changes to the rights of securityholders);
- (i) major contract awards or cancellations;
- (j) scientific, clinical or regulatory results or developments;
- (k) top management or control changes;
- (l) possible tender offers or proxy fights;
- (m) significant write-offs;
- (n) significant regulatory or litigation proceedings;
- (o) impending bankruptcy, receivership or reorganization proceedings;
- (p) gain or loss of a significant license agreement or other contracts with customers or suppliers;
- (q) a breach of a material agreement or a default under a material financing;
- (r) a change in going concern status;
- (s) pricing changes or discount policies;

- (t) cybersecurity risks and incidents, including vulnerabilities and breaches;
- (u) changes in auditors or auditor notification that the issuer may no longer rely on an audit report;
- (v) corporate partner relationships; and
- (w) notice of issuance of patents.

For information to be considered publicly disseminated, it must be widely disclosed through a press release, a filing with the U.S. Securities and Exchange Commission (the “**SEC**”), a previously-announced and publicly available Company earnings call, or other media for broad public access, and a sufficient amount of time must have passed to allow the information to be fully disclosed, which such amount of time may vary depending on the nature and significance of the information. Generally speaking, information will be considered publicly disseminated after two full trading days have elapsed since the date of public disclosure of the information. For example, if an announcement of inside information of which you were aware was made prior to trading on Wednesday, then you may execute a transaction in the Company’s securities on Friday. When in doubt about whether information has been publicly disseminated, contact [TradingApproval@revance.com](mailto:TradingApproval@revance.com).

### III. STOCK TRADING

Because officers and directors of the Company are likely, in the view of the public, to possess inside information about the Company, we require them to do more than refrain from insider trading. We require that Covered Insiders (as defined below), which includes officers and directors, limit their transactions in the Company’s stock to defined time periods following public dissemination of quarterly and annual financial results or pursuant to a 10b5-1 trading plan as discussed below. Though these “blackouts” generally will arise because the Company is involved in a highly-sensitive transaction, they may be declared for any reason. Further, we also require that Covered Insiders notify and receive approval from the Company’s Chief Financial Officer, General Counsel, the Controller or Lead Corporate Counsel (each, a “**Clearing Officer**”) by submitting an email to [TradingApproval@revance.com](mailto:TradingApproval@revance.com) or another method of requesting pre-clearance communicated to the Covered Insiders, at least one business day, but not more than five business days, prior to engaging in transactions in the Company’s stock and observe other restrictions designed to minimize the risk of apparent or actual insider trading.

#### A. *Window Period*

Generally, except as set forth in this Section III.A and in Sections III.B, III.C and III.H of this policy, Covered Insiders may buy or sell securities of the Company only during a “**window period**” that opens after two full trading days have elapsed after the public dissemination of the Company’s annual or quarterly financial results and closes on the last trading day fifteen days before the end of the quarter. This window period may be closed early or may not open if, in the judgment of the Company’s General Counsel, Chief Executive Officer or Chief Financial Officer, there exists undisclosed information that would make trades by Covered Insiders inappropriate. It is important to note that the fact that the window period has closed early or has not opened should be considered inside information. A Covered Insider who believes that special circumstances

require him or her to trade outside the window period should consult with a Clearing Officer. Permission to trade outside the window period will be granted only where the circumstances are extenuating and there appears to be no significant risk that the trade may subsequently be questioned.

## ***B. Exceptions to Window Period***

**1. ESPP and Option Exercises.** Covered Insiders who are eligible to do so may purchase stock under the Company's Employee Stock Purchase Plan ("***ESPP***") on periodic designated dates in accordance with the ESPP without restriction to any particular period. Covered Insiders may exercise options for cash granted under the Company's stock option plans without restriction to any particular period. However, the subsequent sale of the stock (including sales of stock in cashless exercise) acquired upon the exercise of options or pursuant to the ESPP is subject to this policy and, for Covered Insiders, the above window period.

**2. Tax Withholding.** This policy permits the withholding, by the Company, of stock subject to an option or restricted stock award to satisfy any exercise price and/or to cover any tax withholding liability. The Company may, in its sole discretion and in accordance with the terms of the Company's stock option plans, withhold stock for such purposes but the Company is not obligated to do so. This policy does not apply to the sale of stock mandated by the Company in order to satisfy tax withholding obligations upon the vesting of any restricted stock.

**3. 10b5-1 Automatic Trading Programs.** A 10b5-1 trading plan is a binding, written contract between you and your broker that specifies the price, amount, and date of trades to be executed in your account in the future, or provides a formula or mechanism that your broker will follow (a "***Trading Plan***"). A Trading Plan can only be established when you do not possess material, nonpublic information. Therefore, Covered Insiders cannot enter into these plans at any time when in possession of material, nonpublic information and cannot enter into these plans outside window periods. A Trading Plan must not permit you to exercise any subsequent influence over how, when or whether the trades are made and must comply with all other applicable requirements of Rule 105b-1 under the Securities and Exchange Act of 1934, as amended (the ("***Exchange Act***"), including, without limitation, requirements related to (i) minimum cooling off periods (between when the plan is entered into and when trading can commence under the plan), (ii) representations of directors and officers, (iii) good-faith requirements, and (iv) prohibitions on multiple overlapping plans and single-trade plans, all in accordance with the Company's 10b5-1 Trading Plan Policy (the "***10b5-1 Policy***"). You may have an affirmative defense against any claim by the SEC against you for insider trading if your trade was made under a Trading Plan that complied with all of the applicable requirements of Rule 10b5-1 under the Exchange Act, which are very complex. You should consult with your legal and tax advisors before proceeding. Each Covered Insider must submit a request in writing for pre-clearance of such person's proposed Trading Plan in accordance with the terms of the Company's 10b5-1 Policy. The Company reserves the right to withhold pre-clearance of any Trading Plan that the Company determines is not consistent with the rules regarding such plans.

## ***C. Prohibition of Speculative or Short-term Trading***

No director, officer, employee or consultant may engage in short sales, transactions in put or call options, hedging transactions, margin accounts, pledges, or other inherently speculative transactions with respect to the Company's stock at any time.

#### ***D. Covered Insiders***

Directors, officers and certain employees and consultants who are designated by a Clearing Officer and informed of such designation are subject to Sections III.A and III.E because of their access to sensitive Company information (each, a "***Covered Insider***"). Company employees and consultants who are not Covered Insiders must adhere to each of the other terms of this policy (i.e., those terms that are not solely applicable to Covered Insiders). Sections III.F, III.G and III.H set forth additional restrictions on directors and officers of the Company. Sections III.A and III.E and Sections III.F, III.G and III.H, as applicable, also apply to immediate family members of any such Covered Insider, director or officer and other persons that live in such person's respective household, any family members who do not live in such person's respective household, but whose transactions in Company securities are directed by such person or are subject to his or her influence or control (such as parents or children who consult with him or her before they trade in Company securities), and any entity controlled, or whose securities transactions are directed, influenced or controlled, by such Covered Insider, director or officer, as applicable.

#### ***E. Pre-Clearance***

In addition to the requirements of Section III.A above, Covered Insiders may not engage in any transaction in the Company's securities, including any purchase or sale in the openmarket, loan, pledge, hedge or other transfer of beneficial ownership without first obtaining pre-clearance of the transaction from a Clearing Officer. A request for pre-clearance should be submitted to the Clearing Officer by submitting an email to [TradingApproval@revance.com](mailto:TradingApproval@revance.com) or another method of requesting pre-clearance communicated to the Covered Insiders, at least one business day in advance of the proposed transaction. The Clearing Officer is under no obligation to approve a transaction submitted for pre-clearance and may determine not to permit the transaction. If a person seeks pre-clearance and permission to engage in the transaction is denied, then he or she should refrain from initiating any transaction in Company securities and should not inform any other person of the restriction. When a request for pre-clearance is made, the requestor should carefully consider whether he or she may be aware of any material nonpublic information about the Company and should describe fully those circumstances to the Clearing Officer. The requestor should also indicate whether he or she has effected any non-exempt "opposite-way" transactions within the past six months. Directors and officers will also be required to comply with the Company's Section 16 Compliance Program. The Clearing Officer will then determine whether the transaction may proceed and, if so, will assist the individual in complying with the reporting requirements under Section 16(a) of the Exchange Act, if any. Pre-cleared transactions not completed within five business days shall require new pre-clearance under the provisions of this Section III.E. The Company may, at its discretion, shorten such period of time.

#### ***F. Notice Upon Completion of Transactions***

Upon completion of any transaction, officers and directors subject to the reporting obligations under Section 16 of the Exchange Act must immediately notify a Clearing Officer so that the Company may assist in any Section 16 reporting obligations.

#### ***G. Short-Swing Trading/Control Stock/Section 16 Reports***

Officers and directors subject to the reporting obligations under Section 16 of the Exchange Act are responsible for adhering to the prohibition on short-swing trading (Section 16(b) of the Exchange Act) and the restrictions on sales by control persons (Rule 144 under the Securities Act of 1933, as amended), and should file all appropriate Section 16(a) reports (Forms 3, 4 and 5), which are enumerated and described in the Company's Section 16 Compliance Program, and any notices of sale required by Rule 144.

#### ***H. Prohibition of Trading During Pension Fund Blackouts***

In accordance with Regulation BTR under the Exchange Act, no director or executive officer of the Company shall, directly or indirectly, purchase, sell or otherwise acquire or transfer any equity security of the Company (other than an exempt security) during any "blackout period" (as defined in Regulation BTR) with respect to such equity security, if such director or executive officer acquires or previously acquired such equity security in connection with his or her service or employment as a director or executive officer. This prohibition shall not apply to any transactions that are specifically exempted from Section 306(a)(1) of the Sarbanes-Oxley Act of 2002 (as set forth in Regulation BTR), including but not limited to, purchases or sales of the Company's securities made pursuant to, and in compliance with, a Trading Plan; compensatory grants or awards of equity securities pursuant to a plan that, by its terms, permits executive officers and directors to receive automatic grants or awards and specifies the terms of the grants and awards; or acquisitions or dispositions of equity securities involving a bona fide gift or by will or the laws of descent or pursuant to a domestic relations order. The Company shall timely notify each director and executive officer of any blackout periods in accordance with the provisions of Regulation BTR.

#### **IV. DURATION OF POLICY'S APPLICABILITY**

This policy continues to apply to your transactions in the Company's stock or the stock of other companies engaged in business transactions with the Company even after your employment, directorship or consultancy with the Company has terminated. If you are in possession of inside information when your relationship with the Company concludes, you may not trade in the Company's stock or the stock of such other company until the information has been publicly disseminated or is no longer material.

#### **V. PENALTIES**

Anyone who effects transactions in the Company's stock or the stock of other companies engaged in business transactions with the Company (or provides information to enable others to do so) on the basis of inside information is subject to both civil liability and criminal penalties, as well as disciplinary action by the Company, whether or not such person's failure to comply results in a violation of law. Each person is responsible for making sure that any applicable family

member, household member or entity whose transactions are subject to this policy also complies with this policy, and failure to do so will constitute a failure to comply with this policy. An officer, employee, director or consultant who has questions about this policy should contact his or her own attorney or a Clearing Officer.