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Whistleblower Policy

RVL Pharmaceuticals plc
Corporate Policy
RVL Pol LGL-00006

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RVL PHARMACEUTICALS **RVL Pol LGL-00006**	**Whistleblower Policy**	**Original Release: 09/18/2018** **Revised Policy Effective Date: (updated for name change only January 2022)**

Section 301 of the Sarbanes-Oxley Act requires the Audit Committee of the Board of Directors (the "Board") of RVL Pharmaceuticals plc (the "Company") to establish procedures for: (a) the receipt, retention and treatment of complaints received by the Board from employees regarding accounting, internal accounting controls or auditing matters; and (b) the submission by employees of the Company, on a confidential and anonymous basis, of concerns regarding questionable accounting or auditing matters.

The Audit Committee has adopted the following procedures:

1. Any employee of the Company may submit through an anonymous, confidential hotline (844-591-7913 or via the web portal located at https://rvlpharmaceuticals.ethicspoint.com) any concerns about accounting, internal accounting controls, auditing matters or violations of the Company's Code of Business Conduct and Ethics (the "Code"). All concerns submitted through the hotline or email address will initially be reviewed and investigated by the General Counsel or the General Counsel's designee.

2. Complaints regarding accounting, internal accounting controls or auditing matters deemed credible by the General Counsel or the General Counsel's designee will be promptly forwarded to the Chairperson of the Audit Committee. Complaints that are not deemed credible will be communicated to the Chairperson of the Audit Committee no less frequently than quarterly.

3. Complaints relating to violations of the Code will be reviewed by the General Counsel or the General Counsel's designee. If necessary and appropriate, the General Counsel may delegate the investigation of the complaint.

4. Following the receipt of any complaints submitted hereunder, the Audit Committee and/or the General Counsel will investigate each matter so reported and take corrective and disciplinary actions, if appropriate, which may include, alone or in combination, a warning or letter of reprimand, demotion, loss of merit increase, bonus, share options or other share awards, suspension without pay or termination of employment.

5. The Audit Committee and/or the General Counsel may enlist employees of the Company and/or outside legal, accounting or other advisers, as appropriate, to conduct any investigation of complaints about accounting, internal accounting controls, auditing matters or violations of the Code. In conducting any investigation, the Audit Committee and/or the General Counsel shall protect the confidentiality and anonymity of the complainant to the fullest extent possible, consistent with the need to conduct an adequate review.

6. The Company shall not permit retaliation of any kind against employees for complaints submitted hereunder that are made in good faith.

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7. Anyone filing a complaint concerning a violation or suspected violation of accounting, internal controls, auditing matters or the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

8. The Audit Committee and/or the General Counsel shall retain as a part of its records any such complaints or concerns for a period of no less than seven years.

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CORPORATE POLICY APPROVAL SHEET

Policy Number: **RVL Pol LGL-00006**

Policy Title: **Whistleblower Policy**

Document Author: **Chris Klein**

Approval Required By	Signature	Date
Name: Brian Markison Title: Chief Executive Officer	DocuSigned by: Brian Markison 807EF1466A2144E...	2/1/2022
Name: Chris Klein Title: General Counsel	DocuSigned by: Christopher Klein B2A292B830AA44F...	1/28/2022
Name: Andrew Einhorn Title: Chief Financial Officer	DocuSigned by: Andrew Einhorn 94FD5836D6524FD...	2/1/2022