




POLICY 136
EFFECTIVE DATE: 08-APR-2021

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SUPERSEDES DATE: N/A

Equal Employment Opportunity Policy

POLICY APPROVAL

APPROVER: 	Chief Legal Officer and Chief Compliance Officer	Date April 8, 2021
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1. PURPOSE

The purpose of this Equal Employment Opportunity Policy is designed to summarize Aclaris Therapeutics, Inc.'s (Aclaris or Company) rules and regulations regarding anti-discrimination laws and to educate employees about their rights and compliance obligations. The Policy applies to all employees and applicants, as well as to all interactions with independent contractors, temporary employees, and any other firms or their employees working with the Company.

2. SCOPE

This policy applies to all Aclaris employees, contractors, or third-party vendors acting as agents of Aclaris.

3. POLICY

3.1 Overview

The Company seeks to provide equal employment opportunities to all employees and candidates and to comply with all applicable anti-discrimination and anti-harassment laws, rules, orders, and regulations. The Company seeks to employ talented individuals based on their qualifications for the job.


The Company prohibits discrimination of any kind based on race, color, religion, sex (including sexual harassment and pregnancy), national origin, age, disability, genetic information, or any other protected classification under federal, state, or local law. The Company also prohibits any type of harassment or retaliation against anyone filing a complaint or assisting a complaint investigation. An employee who violates this anti-retaliation provision may be subject to discipline, up to and including termination.

This Policy covers all aspects of the employment relationship including, but not limited to, job advertisements, recruitment, application and hiring, job referrals, job assignments and promotions, demotions, layoffs, pay and benefits, discipline and discharge, employment reference, reasonable accommodations, terms and conditions of employment, pre-employment inquiries, workplace conditions, training opportunities or requirements, classification, and evaluation.

The Company will distribute and implement this Policy in accordance with the law.

3.2 Harassment

The Company also prohibits discrimination in the form of harassment (including sexual harassment) and maintains Aclaris Policy #136, Harassment, Discrimination and

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Retaliation Prevention Policy, which is a policy enforced in conjunction with this Equal Employment Opportunity Policy.

Prohibited harassment includes any type of unwelcomed or unsolicited actions that are deemed to be offensive, abusive, threatening, intimidating, or disruptive to others. These actions can include, but are not limited to, making comments or gestures, touching, leering, displaying offensive materials, and any form of stalking or bullying.

3.3 Enforcement

Employees that violate this Policy will face disciplinary action, up to and including termination.

If you believe that you are aware of a violation of this policy, follow the Company's Complaint Procedure to report the violation. The Company will investigate your complaint and take remedial action, if necessary.

If you are unclear on any provisions of this policy, please contact the Legal Department for more information.

4. ADDITIONAL INFORMATION

4.1 Reporting Harassment, Discrimination or Retaliation

Although it is impossible to provide a complete list of what may be deemed unlawful discrimination, harassment, or retaliation under this Policy, problems in this area can be avoided if all persons act in a way that demonstrates respect for others' differences.

Aclaris does not tolerate any form of unlawful discrimination, harassment, or retaliation of co-workers by anyone, including managers, other co-workers, customers, or other business contacts (vendors, contractors, etc.).


Co-workers who believe someone has violated this policy must contact the Aclaris compliance department. There are multiple channels for raising and reporting compliance concerns.

4.1.1 Open Door Policy

The Company has an "Open Door Policy" and your most immediate resource for any matter related to the Code of Conduct is your supervisor. He or she may have the information you need or may be able to refer the question to another appropriate source. The Company encourages personnel to discuss issues, concerns, problems and suggestions with their immediate supervisors or other managers without fear of retaliation.

4.1.2 Compliance Hotline

The Compliance Hotline allows personnel to report a concern or to ask a question anonymously. The Compliance Hotline can be reached by phone at (844) 735-7386.

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This resource is accessible 24 hours a day, 7 days a week, 365 days a year and is operated by specially trained third-party representatives.

4.1.3 Compliance Web-Reporting Tool

Aclaris has chosen an incident reporting system operated by a third-party service provider, which is accessible via www.AclarisComplianceHotline.com, to give you a personal 24-hour hotline tool. To make an online report, log on to www.AclarisComplianceHotline.com. Your confidential and anonymous report will instantly and discreetly be forwarded to appropriate employee(s). After submission, the system will provide you with a unique access number and you will be asked to create a personal password. This information will allow you to re-enter your report to anonymously receive and send messages pertaining to your report as well as check the status. Whether you identify yourself or remain anonymous, your anonymous contact will be kept strictly confidential to the extent reasonably possible within the objectives of the Code of Conduct.

4.1.4 Contact the Chief Compliance Officer directly:

Email: ComplianceOfficer@aclaristx.com

Mail: Compliance Officer, Aclaris Therapeutics, Inc.

640 Lee Rd, Suite 200 Wayne, PA 19087

Phone: (484) 324-7933 and ask for the Chief Compliance Officer

5. REVISION HISTORY

5.1 New Policy: effective date 08-APR-2021