

STRATA SKIN SCIENCES, INC.		
Title:	EARNINGS REPORT QUIET PERIOD POLICY	Policy #: COM: 00X
Department Ownership:	Compliance	
Approved by and Title:	Board of Directors	
Initial Issue Date:	March 24, 2021	Last revision: April 8, 2021

SCOPE

“STRATA” (the “Company”) as used throughout this Policy, refers to the entire Corporate Group and is meant to include all subsidiaries and business offices of the Parent Company, both domestic and international, and all individuals employed therein. This Policy is applicable to any person or entity acting on behalf of or representing the Company. This includes any board member, executive, officer, manager, supervisor, employee, agent (including temporary employee or independent contractor/subcontractor) or affiliate of the Parent Company or any of its Subsidiaries worldwide. All individuals subject to this Policy are expected to read and sign it acknowledging their receipt and understanding of the contents herein.

INTRODUCTION

Earnings reports often have a substantial impact on a stock’s market price when they are initially released. Large deviations from the earnings projections of market analysts can cause a sharp rise or dramatic decline in a stock’s price. Thus, the SEC again has a vested interest in trying to assure a level playing field, that no investors have an advantage, or be at a disadvantage, due to advance information about earnings reports leaking out to some people early.

QUIET PERIOD

The earnings report quiet period is applied to the time frame that covers the period beginning one calendar week after the end of the Company’s fiscal quarter and extending to the actual date and time of the earnings report is released. (the “Quiet Period”) This policy means that unless otherwise required by law or unless the factual situation requires announcements during the Quiet Period, there shall be no issuances by the Company of press releases or public statements which contain financial information not previously disclosed of any kind. In order to determine if a press release or other statement containing financial information must or may be issued, the CEO or the CFO shall engage in a dialogue with the Chair of the Board, Chair of the Audit Committee, in-house counsel, outside securities counsel, and such other individuals as shall be desirable for the analysis.

Only with the consensus of either the Chairs of the Board and Audit Committee shall a financial or a non-financial press release or other form of announcement be made. Such disclosure shall be accompanied by the appropriate filing with the SEC.

Notwithstanding the foregoing, when the CEO and CFO have agreed that attendance at an investor or similar conference, including one-one-one investor meetings, is in the best interests of the Company. The CEO and CFO they shall limit their comments and discussion to the investor presentation disclosed on the Company’s Investor Page on the website. Prior to beginning their remarks at an investor conference, the CEO or CEO shall state that their comments are limited to historical data. Similarly the investor presentation shall prominently state that information is historical. In summary, no previously

undisclosed information shall be provided in any form, whether oral or written, at these meetings or conferences.

DISSEMINATION AND AMENDMENT

This Policy will be assessed by Management and reviewed by the Company's Board on an annual basis. This Policy shall be distributed to each new executive, officer, and Board member of the Company upon commencement of his or her employment or other relationship with the Company.

The Company reserves the right to amend or alter this Policy at any time for any reason. If this Policy is amended or altered, it will be redistributed to all pertinent individuals.