

## **SEAPORT THERAPEUTICS, INC.**

### **Amended and Restated Code of Business Conduct and Ethics – A Message from our Chief Executive Officer**

Dear Seaport Team Member:

Seaport Therapeutics, Inc., and its subsidiaries and affiliates' (collectively, "Seaport") reputation and continued success on our mission to help people living with neuropsychiatric disorders are dependent upon the conduct of its employees, officers, directors and agents acting on our behalf. To achieve our mission, we must hold ourselves to the highest standards of business and ethical conduct. This Code of Business Conduct and Ethics (the "Code of Conduct") is guided by our values of "service," "we own it", "happiness," and "as a team" and outlines the principles guiding our actions to ensure integrity in everything we do, innovation, and a patient-centered approach. When acting on behalf of "Seaport", each employee, director, officer and agent, as a steward of Seaport's good name, has a responsibility to ensure that his or her conduct is ethical and conforms to all applicable laws, rules and regulations.

Our Code of Conduct sets out the core principles and requirements for ethical business conduct that governs our business and behavior. Each of us, and as a team, has a responsibility to understand and follow these ethical principles, and to speak up when there are concerns about potential or actual violations, which is a key value of our "we own it" culture. It is with our dedication to integrity and through ethical business conduct that Seaport will achieve its mission and earn the trust of our partners, investors, suppliers, and ultimately the patients we serve.

Attached to help all of us is our Amended and Restated Code of Business Conduct and Ethics. Our Code of Conduct is a reaffirmation of Seaport's commitment to conducting its business ethically and to observing applicable laws, rules and regulations. The Code of Conduct reminds and guides us through the principles and requirements that govern our business and behavior. When representing Seaport, each director, officer and employee must protect and promote both the letter of the Code of Conduct and its spirit of ethical conduct. Your adherence to these ethical principles is fundamental to our future success.

The Code of Conduct cannot provide definitive answers to all questions. Accordingly, we expect each director, officer and employee to exercise reasonable judgment to determine whether a course of action is consistent with our ethical and legal standards, and to seek guidance when appropriate. Your supervisor will often be the person who can provide you with thoughtful, practical guidance in your day-to-day duties. We have also appointed Lana Gladstein, at [lane.gladstein@seaporttx.com](mailto:lane.gladstein@seaporttx.com), as our Compliance Officer, so you should feel free to ask questions or seek guidance from her. If you are unable to contact the Compliance Officer, or if you do not feel you can discuss the matter with the Compliance officer, you may contact our Chief Financial Officer, Lauren White, at [lauren.white@seaporttx.com](mailto:lauren.white@seaporttx.com), who shall be the alternate Compliance Officer (the Compliance Officer and the alternate Compliance Officer are hereinafter referred to as the "Compliance Officer").

Please read the Code of Conduct carefully and ensure that you understand it. If you have any questions concerning the Code of Conduct, please speak with your supervisor or the Compliance Officer. Within five days of reading the Code of Conduct, please sign the enclosed

acknowledgment and return it to the Compliance Officer. You may also be asked periodically in succeeding years to confirm in writing that you have complied with the Code of Conduct.

Sincerely,

Daphne Zohar  
Chief Executive Officer

# SEAPORT THERAPEUTICS, INC.

## Amended and Restated Code of Business Conduct and Ethics

### I. Purpose and Scope

The Board of Directors (the “Board”) of Seaport Therapeutics, Inc. (together with its subsidiaries and affiliates, “Seaport”) has adopted this Amended and Restated Code of Business Conduct and Ethics (this “Code of Conduct”) to aid Seaport’s employees, directors, officers and agents in making ethical and legal decisions when conducting Seaport’s business and performing their day-to-day duties.

The Board or a committee of the Board is responsible for administering the Code of Conduct. The Board has delegated day-to-day responsibility for administering and interpreting the Code of Conduct to a Compliance Officer.

Seaport expects its employees, directors, officers and agents to exercise reasonable judgment when conducting Seaport’s business. Seaport encourages its employees, directors, officers and agents to refer to this Code of Conduct frequently to ensure that they are acting within both the letter and spirit of this Code of Conduct. Seaport also understands that this Code of Conduct will not address every situation you may encounter or every concern you may have about conducting Seaport’s business ethically and legally. In these situations, or if you otherwise have questions or concerns about this Code of Conduct, Seaport encourages you to seek guidance from your supervisor (if applicable), Human Resources, or, if you are uncomfortable doing that, with the Compliance Officer.

Seaport’s employees, directors, officers and agents generally have other legal and contractual obligations to Seaport. The Code of Conduct is not intended to replace the other obligations you have to Seaport. Instead, the Code of Conduct should be viewed as imposing the *minimum standards* Seaport expects from its employees, directors, officers and agents in the conduct of Seaport’s business.

For clarity, certain aspects of the Code of Conduct— including supervisory obligations, day-to-day compliance protocols, and operational policies such as Responsible Use of Artificial Intelligence — apply only to officers, employees and agents, not directors. Directors are expected to comply with the Code of Conduct provisions relevant to their governance role — including conflicts of interest, confidentiality, insider trading, fair dealing, accuracy of records and overall ethical oversight — and to act consistently with the spirit of the Code of Conduct in all board activities. In sum, directors are accountable under the Code of Conduct only to the extent its provisions reasonably apply to their governance and oversight responsibilities, and nothing herein is intended in any way to expand their legal obligations.

### II. Standards of Conduct

#### A. Compliance with Laws, Rules and Regulations; Whistleblower Protection

Seaport requires that all employees, directors, officers and agents comply with all laws, rules and regulations applicable to Seaport wherever it does business. You are expected to use good judgment and common sense in seeking to comply with all applicable laws, rules and regulations and to ask for advice when you are uncertain about them.

If you become aware of the violation of any law, rule or regulation by Seaport, whether by its directors, officers, employees or any third party doing business on behalf of Seaport, subject to the provisions in the following paragraph, it is your responsibility to promptly report the matter to your supervisor or to the Compliance Officer.

Whistleblower Protection: Nothing contained in this Code of Conduct, any agreement you have entered into with Seaport, or any other Seaport policy limits your ability, with or without notice to Seaport, to: (i) file a charge or complaint with any federal, state or local governmental agency or commission (a "Government Agency") such as the Equal Employment Opportunity Commission, the National Labor Relations Board or the Securities and Exchange Commission (the "SEC"); (ii) communicate with any Government Agency or otherwise participate in any investigation or proceeding that may be conducted by any Government Agency, including by providing information or documents not subject to attorney-client privilege; (iii) exercise any rights under Section 7 of the National Labor Relations Act, which are available to non-supervisory employees, including assisting co-workers with or discussing any employment issue as part of engaging in concerted activities for the purpose of mutual aid or protection; (iv) share compensation information concerning you or others (provided that this does not permit you to disclose compensation information concerning others that you obtain because your job responsibilities require or allow access to such information); (v) discuss or disclose information about unlawful acts in the workplace, such as harassment or discrimination or any other conduct that you have reason to believe is unlawful; or (vi) testify truthfully in a legal proceeding. Any communications and disclosures related to these matters must be consistent with applicable law and the information disclosed must not have been obtained through a communication that was subject to the attorney-client privilege (unless disclosure of that information would otherwise be permitted consistent with such privilege or applicable law). Seaport will not limit any right you may have to receive an award pursuant to the whistleblower provisions of any applicable law or regulation for providing information to the SEC or any other Government Agency. Any provisions of any agreement between Seaport and any current or former employee that is inconsistent with the above language or that may limit or interfere with the ability of any person to receive an award under the whistleblower provisions of applicable law will not be enforced by Seaport.

## **B. Conflicts of Interest**

Seaport recognizes and respects the right of its employees, directors, officers and agents to engage in outside activities that they may deem proper and desirable, provided that these activities do not impair or interfere with the performance of their duties to Seaport or their ability to act in Seaport's best interests. In most, if not all, cases this will mean that our directors, officers and employees must avoid situations that present a potential or actual conflict between their personal or outside professional interests and Seaport's interests.

A “conflict of interest” occurs when a director’s, officer’s, employee’s or agent’s personal interest interferes with Seaport’s interests. Conflicts of interest can arise in many situations. For example, conflicts of interest can arise when a director, officer, employee or agent takes an action or has an outside interest, responsibility or obligation that can make it difficult for him or her to perform the responsibilities of his or her position objectively or effectively in Seaport’s best interests. Conflicts of interest can also occur when a director, officer or employee or his or her immediate family member receives some personal benefit (whether improper or not) as a result of the director’s, officer’s, employee’s or agent’s position with Seaport. Each individual’s situation is different and in evaluating his or her own situation, a director, officer or employee will have to consider many factors.

Any material transaction, responsibility, obligation or relationship that reasonably could be expected to give rise to a conflict of interest should be reported promptly to the Compliance Officer, who may notify the Board or a committee of the Board as he or she deems appropriate. Actual or potential conflicts of interest involving a director, officer or employee other than the Compliance Officer should be disclosed directly to the Compliance Officer. Actual or potential conflicts of interest involving the Compliance Officer should be disclosed directly to the Chief Financial Officer.

### **C. Insider Trading**

Employees, directors, officers and agents who have material non-public information about Seaport or other companies, including our partners, suppliers and customers, as a result of their relationship with Seaport are prohibited by law and Seaport policy from trading in securities of Seaport or such other companies, as well as from communicating such information to others who might trade on the basis of that information. To help ensure that you do not engage in prohibited insider trading and avoid even the appearance of an improper transaction, Seaport has adopted an Insider Trading Policy, which is distributed to employees, directors, officers and agents and is also available from the Compliance Officer.

If you are uncertain about the constraints on your purchase or sale of any Seaport securities or the securities of any other company that you are familiar with by virtue of your relationship with Seaport, you should consult with the Compliance Officer before making any such purchase or sale.

### **D. Confidentiality**

Subject to the whistleblower protections set forth in Section II.A, employees, directors, officers and agents must maintain the confidentiality of confidential information entrusted to them by Seaport or other companies, including our partners, suppliers and customers, except when disclosure is authorized by a supervisor or legally mandated. Unauthorized disclosure of any confidential information is prohibited. Additionally, employees, directors, officers and agents should take appropriate precautions to ensure that confidential or sensitive business information, whether it is proprietary to Seaport or another company, is not communicated within Seaport except to employees, directors, officers and agents who have a need to know such information to perform their responsibilities for Seaport.

Third parties may ask you for information concerning Seaport. Subject to the exceptions noted in the preceding paragraph and the whistleblower protections set forth in Section II.A, employees, directors, officers and agents (other than Seaport's authorized spokespersons) must not discuss internal Seaport matters with, or disseminate internal Seaport information to, anyone outside Seaport, except as required in the performance of their Seaport duties and, if appropriate, after a confidentiality agreement is in place. This prohibition applies particularly to inquiries concerning Seaport from the media, market professionals (such as securities analysts, institutional investors, investment advisers, brokers and dealers) and security holders. All responses to inquiries on behalf of Seaport must be made only by Seaport's authorized spokespersons. If you receive any inquiries of this nature, you must decline to comment and refer the inquirer to your supervisor or one of Seaport's authorized spokespersons.

You also must abide by any lawful obligations that you have to your former employer(s). These obligations may include restrictions on the use and disclosure of confidential information, restrictions on the solicitation of former colleagues to work at Seaport, and non-competition obligations.

#### **E. Honest and Ethical Conduct and Fair Dealing**

Employees, directors, officers and agents should endeavor to deal honestly, ethically and fairly with Seaport's partners, suppliers, customers, competitors, and employees. Statements regarding Seaport's products and services must not be untrue, misleading, deceptive or fraudulent. You must not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice. Employees, directors, officers and agents should use good judgment and common sense in seeking to comply with the Code of Conduct and other policies, and all applicable laws, rules and regulations must never engage in deception, fraud, misrepresentation, or work with others to engage in such acts.

#### **F. Protection and Proper Use of Corporate Assets**

Employees, directors, officers and agents should seek to protect Seaport's assets. Theft, carelessness and waste have a direct impact on Seaport's financial performance. Employees, directors, officers and agents must use Seaport's assets and services solely for legitimate business purposes of Seaport and not for any personal benefit or the personal benefit of anyone else.

#### **G. Corporate Opportunities**

Employees, directors, officers and agents owe a duty to Seaport to advance its legitimate business interests when the opportunity to do so arises. Each director, officer and employee is prohibited from:

- diverting to himself or herself or to others any opportunities that are discovered through the use of Seaport's property or information or as a result of his

or her position with Seaport unless that opportunity has first been presented to, and rejected by, Seaport;

- using Seaport's property or information or his or her position for improper personal gain; or
- competing with Seaport.

Seaport recognizes that some of its directors may have affiliations with and owe fiduciary duties to other organizations, including organizations that invest in companies in the same industry or compete with Seaport. This section is not intended to prohibit Seaport's directors from fulfilling those obligations, making or managing such investments, or otherwise exercising their fiduciary duties to those organizations, provided that when acting in their capacity as Seaport directors they act in good faith and in the best interests of Seaport. For the avoidance of doubt, nothing in this Code of Conduct constitutes, or should be construed as, a renunciation of Seaport's interest or expectancy in any corporate opportunity under DGCL §122(17). Any such renunciation must be set forth in Seaport's Certificate of Incorporation (as amended and restated from time to time) or adopted by the Board.

#### **H. Political Contributions/Gifts**

Business contributions to political campaigns are strictly regulated by federal, state, provincial and local law in the U.S. and many other jurisdictions. Accordingly, all political contributions proposed to be made with Seaport's funds must be coordinated through and approved by the Compliance Officer. Employees, directors, officers and agents may not, without the approval of the Compliance Officer, use any Seaport funds for political contributions of any kind to any political candidate or holder of any national, state or local government office. Employees, directors, officers and agents may make personal contributions, but should not represent that they are making contributions on Seaport's behalf. Specific questions should be directed to the Compliance Officer.

#### **I. Bribes, Kickbacks and Other Improper Payments**

Seaport does not permit or condone bribes, kickbacks or other improper payments, transfers or receipts. No director, officer, employee or agent should offer, give, solicit or receive any money or other item of value for the purpose of obtaining, retaining or directing business or bestowing or receiving any kind of favored treatment. Employees, directors, officers and agents must fully comply with all anti-corruption laws of the countries in which Seaport does business. Seaport's Foreign Corrupt Practices Act and Anti-Corruption Policy further establishes Seaport's policies and guidelines to facilitate compliance with the FCPA and similar anti-corruption laws of other nations by all Seaport personnel, contractors and agents. Violation of the FCPA could subject Seaport and its individual employees, directors, officers, and agents to serious civil and criminal penalties.

#### **J. Interactions with Healthcare Professionals**

In the United States and elsewhere interactions with healthcare professionals are subject to special laws and stringent oversight. The term “healthcare professional” includes anyone (or any entity) who may be in a position to purchase, prescribe, arrange for or recommend the purchase or prescription of Seaport’s products.

These laws include the prohibition of kickbacks, or the payment of anything of value (including money, gifts, meals, services, entertainment or other items) made for the purpose of improperly influencing a decision to obtain or retain business. A key purpose of these laws is to protect the independence and objectivity of healthcare professionals when treating patients.

Seaport prohibits all kickbacks and improper inducements to healthcare professionals to prescribe or purchase Seaport’s products. All interactions with healthcare professionals must be professional in nature and facilitate the exchange of medical or scientific information, with the ultimate goal of benefiting patient care. To avoid any actual or perceived kickbacks or inducements, all arrangements with healthcare professionals to provide consulting or other services to Seaport must be in response to a legitimate business need and set forth in a written agreement and related payments must not exceed fair market value for the services rendered.

You must consult applicable Seaport policies before engaging healthcare professionals to provide services and before providing anything of value (including meals or fees for consulting or other business relationships) to a healthcare professional. Please contact our Compliance Officer with any questions about interactions with healthcare professionals.

#### **K. Scientific Integrity**

Research integrity is fundamental to the scientific process and to Seaport’s ability to bring novel therapeutic products to the market. All Seaport research and development must be conducted according to all applicable laws and regulations, authorship rules, reporting requirements and the generally accepted ethical standards of the scientific community. Scientific misconduct, such as fabrication, falsification, or plagiarism in proposing, conducting, or reporting research results, disregards the intellectual contributions of others, impedes the progress of research and corrupts the scientific record. Therefore, it is prohibited at Seaport.

#### **L. Product Promotion**

If and when Seaport has a product approved for commercial sale in any market, Seaport will only promote and market its approved products in an honest and truthful manner, using accurate and well-balanced information in all of its marketing activities. Marketing and promotion content must: (i) always be presented in a fair and balanced manner, including an accurate statement of appropriate safety information, which should never be minimized or misrepresented; (ii) never promote products for unapproved uses or in a manner that is not consistent with the approved product label; (iii) be approved for use; and (iv) comply with applicable laws and regulations and Seaport’s policies and procedures.

When marketing or promoting approved Seaport products to healthcare professionals and patients, you must follow Seaport's policies and procedures. You should contact our Compliance Officer with questions about the proper promotion of Seaport's products.

**M. International Trade Controls**

Many countries regulate international trade transactions, such as imports, exports and international financial transactions and prohibit boycotts against countries or firms that may be "blacklisted" by certain groups or countries. Seaport's policy is to comply with these regulations and prohibitions even if compliance may result in the loss of some business opportunities. Employees should learn and understand the extent to which international trade controls apply to transactions conducted by Seaport.

**N. Accuracy of Records**

Employees, directors, officers and agents must honestly and accurately report all business transactions. You are responsible for the accuracy of your records and reports. Accurate information is essential to Seaport's ability to meet legal and regulatory obligations.

All Seaport books, records and accounts shall be maintained in accordance with all applicable regulations and standards and accurately reflect the true nature of the transactions they record. The financial statements of Seaport shall conform to generally accepted accounting rules and Seaport's accounting policies. No undisclosed or unrecorded account or fund shall be established for any purpose. No false or misleading entries shall be made in Seaport's books or records for any reason, and no disbursement of corporate funds or other corporate property shall be made without adequate supporting documentation.

**O. Quality of Public Disclosures**

It is the policy of Seaport to provide full, fair, accurate, timely and understandable disclosure in reports and documents filed with, or submitted to, the SEC and to public agencies, such as the U.S. Food and Drug Administration, and in public communications, presentations, or scientific publications.

Seaport is committed to providing its shareholders with complete and accurate information about its financial condition and results of operations.

All public presentations regarding Seaport, its business, research and development programs, or products must be reviewed internally and signed off by the Communications and Legal departments before being disseminated. If you have questions, you are encouraged to consult with the Head of Communication or Compliance Officer.

**P. Social Media and Digital Conduct**

Employees, officers, directors and agents must exercise care and professionalism when engaging in online communications, including social media. Seaport information that

is confidential or non-public, such as about our research, clinical programs, partners, patients, or employees must never be disclosed publicly. All representatives are expected to avoid statements that could mislead stakeholders, violate regulatory standards, or harm Seaport's reputation. Personal social media use should not be conducted in a manner that implies unauthorized representation of Seaport. When in doubt, refrain from posting and seek guidance from Seaport's Head of Communication or Compliance Officer. Only designated Seaport spokespersons may communicate externally on behalf of Seaport, including through digital platforms. If you receive an inquiry from the media, investors, or analysts via social channels, please direct them to the Head of Communication.

#### **Q. Responsible Use of Artificial Intelligence (AI)**

Seaport may utilize AI or machine-learning technologies in research, operations and decision-making and is committed to the responsible and ethical use of AI. Employees, officers and agents must use these tools responsibly and in accordance with applicable laws, regulations and Seaport policies. AI may not be used in ways that compromise data or scientific integrity, patient safety, confidentiality, or regulatory compliance. AI-generated outputs must always be reviewed and validated before being relied upon. Employees, officers and agents are expected to consult Seaport's AI Use Policy and seek guidance from the Compliance Officer if uncertain.

#### **R. Cybersecurity and Protection of Information**

Protecting Seaport's systems, confidential information and intellectual property is a responsibility shared by all employees, officers, directors and agents. We must all safeguard confidential information, including research data, patient information and business strategies, against unauthorized access, disclosure, or misuse. Employees, officers, directors and agents are required to follow Seaport's information security protocols (including multi-factor authentication, encryption and secure file-sharing), use secure systems, and immediately report suspected data breaches or cybersecurity incidents to Seaport's IT and Compliance Officer. Failure to uphold these responsibilities could expose Seaport to regulatory, legal and reputational risks.

### **III. Compliance Procedures**

#### **A. Communication of Code of Conduct**

All current employees, directors, officers and agents are being supplied a copy of the Code of Conduct. Future employees, directors, officers and agents will be supplied a copy of the Code of Conduct when beginning service at Seaport. All directors, officers and employees will be expected to review and sign an acknowledgment regarding the Code of Conduct on a periodic basis. Updates of the Code of Conduct, when adopted, will be promptly supplied to directors, officers and employees. Directors, officers and employees also can obtain a copy of the Code of Conduct by requesting one from the human resources department or by accessing Seaport's website at <https://seaporttx.com>.

## **B. Monitoring Compliance and Disciplinary Action**

Seaport's management, under the supervision of its Board or a committee of the Board or, in the case of accounting, internal accounting controls, auditing or securities law matters or the Audit Committee, shall take reasonable steps to (i) monitor compliance with the Code of Conduct, and (ii) when appropriate, impose and enforce appropriate disciplinary measures for violations of the Code of Conduct.

Disciplinary measures for violations of the Code of Conduct will be determined in Seaport's sole discretion and may include, but are not limited to, counseling, oral or written reprimands, warnings, probation or suspension with or without pay, demotions, reductions in salary, termination of employment or service and restitution.

Seaport's management shall periodically report to the Board or a committee of the Board on these compliance efforts including, without limitation, alleged violations of the Code of Conduct and the actions taken with respect to violations.

## **C. Communication Channels**

*Be Proactive.* Every director, officer, employee and agent is encouraged to act proactively by asking questions, seeking guidance and reporting suspected violations of the Code of Conduct and other policies and procedures of Seaport, as well as any violation or suspected violation of law, rule or regulation resulting from the conduct of Seaport's business or occurring on Seaport's property. **If a director, officer, employee or agent believes that actions have taken place, may be taking place, or may be about to take place that violate or would violate the Code of Conduct or any law, rule or regulation applicable to Seaport, he or she is obligated (subject to the whistleblower protections set forth in Section II.A above) to bring the matter to the attention of Seaport.** Our internal ethics hotline number is +1-888-875-0531. An online reporting option is: <https://report.syntrio.com/seaporttx>.

*Seeking Guidance.* The best starting point for officers or employees seeking advice on ethics-related issues or wishing to report potential violations of the Code of Conduct will usually be their supervisor. However, if the conduct in question involves an officer's or employee's supervisor, if the officer or employee has reported the conduct in question to the supervisor and does not believe that the supervisor has dealt with it properly, or if the officer or employee does not feel comfortable discussing the matter with the supervisor, the officer or employee may raise the matter with the Compliance Officer.

*Communication Alternatives.* Any officer or employee may communicate with the Compliance Officer, or report potential violations of the Code of Conduct, by any of the following methods:

By e-mail to Lana Gladstein or Lauren White (anonymity cannot be maintained);

In writing (which can be done anonymously as set forth below under “Anonymity”), addressed to the Compliance Officer, by mail to c/o Seaport Therapeutics, Inc., 101 Seaport Blvd., Floor 12, Boston, MA 02210 USA; or

Online at <https://report.syntrio.com/seaporttx> (which may be done anonymously as set forth below under “Anonymity”); or

By phoning and leaving a voicemail. The voicemail can be reached at +1-888-875-0531 and messages can be left anonymously as set forth below under “Anonymity.”

Our whistleblower hotline allows individuals to remain anonymous at their option. The hotline is a confidential channel for reporting misconduct that breaches the Code of Conduct or the law if you feel uncomfortable reporting the issue directly to your supervisor, Human Resources, or the General Counsel. All reports submitted through the hotline are immediately escalated to the General Counsel and Chief Financial Officer (provided that, if the report concerns one of these individuals, such individuals will not receive notice of the report), and then to the Board. Only issues determined in good faith and on the basis of a reasonable belief, such as fraud, harassment, safety violations and other illegal, unethical and dangerous behavior are intended to be reported via the anonymous whistleblower hotline. The hotline is not intended for personal complaints or coworker conflicts, workplace gossip, suggestions or feedback, dissatisfaction with management and emergencies. Importantly, in the event of an emergency, you must contact the applicable emergency services, such as police, fire, or ambulance, instead.

*Reporting Accounting and Similar Concerns.* Concerns or questions regarding potential violations of the Code of Conduct, a Seaport policy or procedure or laws, rules or regulations relating to accounting, internal accounting controls or auditing or securities law matters will be directed to the Audit Committee of the Board (the “Audit Committee”) or a designee of the Audit Committee in accordance with the procedures established by the Audit Committee for receiving, retaining and treating complaints regarding accounting, internal accounting controls or auditing matters. Officers and employees can also communicate directly with the Audit Committee or its designee regarding such matters by the following methods (which can be done anonymously as set forth below under “Anonymity”):

By e-mail to Lana Gladstein or Lauren White (anonymity cannot be maintained);

In writing (which can be done anonymously as set forth below under “Anonymity”), addressed to the Audit Committee Chair or Compliance Officer, by mail to c/o Seaport Therapeutics, Inc., 101 Seaport Blvd., Floor 12, Boston, MA 02210 USA; or

Online at <https://report.syntrio.com/seaporttx> (which may be done anonymously as set forth below under “Anonymity”); or

By phoning and leaving a voicemail. The voicemail can be reached at +1-888-875-0531 and messages can be left anonymously as set forth below under “Anonymity.”

*Cooperation.* Employees, directors, officers and agents are expected to cooperate with Seaport in any investigation of a potential violation of the Code of Conduct, any other Seaport policy or procedure, or any law, rule or regulation.

*Misuse of Reporting Channels.* Employees, directors, officers and agents should not use these reporting channels in bad faith or in a false or frivolous manner or to report grievances that do not involve the Code of Conduct or other ethics-related issues.

*Director Communications.* In addition to the foregoing methods, a director also can communicate concerns or seek advice with respect to this Code of Conduct by contacting the Board through its Chair or the Audit Committee.

#### **D. Anonymity**

Seaport prefers that officers and employees, when reporting suspected violations of the Code of Conduct, identify themselves to facilitate Seaport’s ability to take steps to address the suspected violation, including conducting an investigation. Seaport also recognizes that some people may feel more comfortable reporting a suspected violation anonymously.

An officer or employee who wishes to remain anonymous may do so, and Seaport will use reasonable efforts to protect confidentiality. If a report is made anonymously, however, Seaport may not have sufficient information to investigate or evaluate the allegations. Accordingly, persons who report suspected violations anonymously should provide as much detail as they can to permit Seaport to evaluate the allegation and, if it deems appropriate, conduct an investigation.

#### **E. No Retaliation**

Seaport forbids any retaliation against an officer or employee who, acting in good faith on the basis of a reasonable belief, reports suspected misconduct. Specifically, Seaport will not discharge, demote, suspend, threaten, harass or in any other manner discriminate against, such an officer or employee. Anyone who participates in any such conduct is subject to disciplinary action, including termination.

### **IV. Waivers and Amendments**

No waiver of any provisions of the Code of Conduct for the benefit of a director or an executive officer (which includes, without limitation, Seaport’s principal executive, financial and accounting officers) shall be effective unless (i) approved by the Board or, if permitted, the Audit Committee, and (ii) if required, the waiver is promptly disclosed to Seaport’s securityholders in accordance with applicable U.S. securities laws and the rules and regulations of the exchange or system on which Seaport’s shares are traded or quoted, as the case may be.

Any waivers of the Code of Conduct for other employees may be made by the Compliance Officer, the Board or, if permitted, the Audit Committee.

All amendments to the Code of Conduct must be approved by the Board and, if required, must be promptly disclosed to Seaport's securityholders in accordance with United States securities laws and Nasdaq rules and regulations.

ADOPTED: April 7, 2026

EFFECTIVE: April 30, 2026

## ACKNOWLEDGMENT

I acknowledge that I have reviewed and understand Seaport Therapeutics, Inc.'s Amended and Restated Code of Business Conduct and Ethics (the "Code of Conduct") and agree to abide by the provisions of the Code of Conduct.

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Signature

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Name (Printed or typed)

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Position

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Date