# WHISTLEBLOWER POLICY

**THIS POLICY WAS APPROVED BY THE BOARD ON JULY 8, 2026**

## PURPOSE

Scribe Therapeutics Inc. (the "***Company***") is committed to the highest standards of ethics, integrity, and accountability and to complying with applicable laws, rules, and regulations related to its business. You are required to perform your duties and responsibilities with honesty and integrity and to comply with all applicable laws, rules, and regulations, as well as Company policies. You must acquire appropriate knowledge of and comply with the laws, rules and regulations that apply to your position and your area of responsibility and be able to recognize the potential dangers of non-compliance. You are required to participate in trainings made mandatory by the Company for all employees and service providers, as well as training required for your particular position. If you do not believe you have been provided with the appropriate information or training regarding laws, rules and regulations that apply to your position, please speak with your manager.

Situations that may involve a violation of ethics, laws, regulations or any Company policy may not always be clear and may require difficult judgment. Seek guidance if you have any questions or concerns about how you should conduct yourself. If you become aware of an actual or suspected violation of our policies or of any applicable laws, rules or regulations, it is your responsibility and obligation to report it promptly and you should do so without fear of reprisal or retaliation of any kind.

We have established this Whistleblower Policy (this "***Policy***") to enable employees and other service providers to report any activity that is or suspected to be unlawful or otherwise violates our policies so that we can investigate and resolve potential violations as quickly, thoroughly and efficiently as possible.

You are encouraged to use the guidance provided by this Policy to report all known and suspected improper activities as described below. This Policy is designed to provide you with a confidential or anonymous method for reporting any activities that are improper or suspected to be improper.

You should understand, however, that nothing in this Policy (nor any other Company policy or agreement) limits, impedes, or restricts your ability to contact, report to, or file a charge or complaint with, the Securities and Exchange Commission, or any other federal, state, or local government agency or commission ("***Government Agencies***") at any time. This Policy also does not limit your ability to participate and/or assist in any investigation or proceeding that may be conducted by any Government Agencies, including providing documents or other information without notice to the Company related to conduct you reasonably believe is a violation of any law, rule, or regulation, or of any Company policy. Nothing in this Policy limits your right to seek and/or receive an award for information provided to any Government Agencies or prohibits you from providing truthful information in response to a subpoena or other legal process.

**PERSONS COVERED BY THIS POLICY**

This Policy applies to our employees, contractors, consultants, agents, representatives, officers and members of our Board of Directors ("***Board***").

**WHEN SHOULD VIOLATIONS BE REPORTED**

We ask that you follow this Policy to report good faith concerns regarding known or suspected violations of any of the following:

1. laws, governmental rules or regulations;

2. accounting, internal accounting controls or auditing matters; or

3. any Company policies (including our Code of Business Conduct and Ethics).

Keep in mind that your reporting obligation includes complaints or reports you might get from people outside of the Company or Company employees and service providers that you supervise or may report to you and complaints regarding third parties who provide services to us, whether directly or indirectly.

**HOW TO REPORT VIOLATIONS**

If you believe that any violation has occurred or is occurring or you have a good faith concern regarding conduct that you reasonably believe may be a violation, you are required to promptly take one or more of the following steps:

1. Report the known or suspected violation to your manager and/or supervisor.

2. If you would prefer to speak to someone other than your manager or supervisor, you can report concerns to our Compliance Officer (as defined in our Code of Business Conduct and Ethics) at dparrot@scribetx.com.

3. Alternatively, you may report the known or suspected violation confidentially and anonymously by:

- Calling our compliance hotline toll-free at 800-234-7053; or

- Online at https://www.whistleblowerservices.com/SCRB.

If you report using the above procedures, your report will automatically be directed to the Chair of the Audit Committee of our Board ("***Audit Committee***"), with a copy to our Compliance Officer. The Chair of the Audit Committee shall have direct access to the compliance hotline portal and may independently view any report at any time. Human resources complaints that do not involve accounting, internal accounting controls and auditing matters or violations of federal or state laws (including securities laws) or any other legal or compliance violation will be reported to our human resources team.

You are encouraged to provide as much detail as possible regarding the subject matter of the complaint or concern to allow for a proper investigation. In order to better respond to any reported concerns, it would be helpful if you provide your telephone number and other contact information when making the report. If concerns or complaints require confidentiality, we will endeavor to protect this confidentiality, subject to applicable law, regulation or legal proceedings. However, if you prefer to remain anonymous, you may report a concern without disclosing your name or position.

If you wish to report a matter directly to our Audit Committee, you may use the process above and indicate that the report should be delivered directly to the Audit Committee, you may send an email to auditcommitteechair@scribetx.com or you may send a letter addressed to the Chair of the Audit Committee at 1150 Marina Village Pkwy, Alameda, California 94501, marked “Attention: Audit Committee”. The Audit Committee will take whatever steps it deems necessary to respond to a report that it receives, including whether to refer the matter to our Compliance Officer for investigation.

**INVESTIGATION**

We treat all reports seriously. The Company will promptly review and address each concern as appropriate. This may involve an investigation conducted by qualified personnel. Investigations will be conducted confidentially to the extent practical and appropriate under the circumstances, recognizing that some disclosure may be necessary to effectively investigate the complaint.

You should not conduct your own independent investigation into any suspected violations; instead, make your complaint or report by following the procedures in this Policy. Managers are expected to report such issues through one of the channels discussed in this Policy and encourage other employees to do the same. The Chair of the Audit Committee and the Compliance Officer will review and coordinate the investigation and resolution of all complaints and reports of a suspected violation, as well as ensure that corrective action is taken, as necessary and appropriate; provided, however, that where a report involves allegations concerning the Compliance Officer or any executive officer, the Audit Committee (or its designee) shall assume responsibility for oversight of the investigation. Violations of this Policy that involve illegal behavior may be reported to the appropriate governmental authorities for enforcement proceedings.

**WE DO NOT RETALIATE AGAINST WHISTLEBLOWERS**

We will not tolerate any intimidation, harassment, retaliation or any kind of discrimination or adverse action against someone who reports actual or suspected violations in good faith. Any employee who engages in harassment, retaliatory or discriminatory conduct in violation of this Policy will be disciplined, up to and including termination. In some cases, federal, state, and/or local law provides that retaliatory action for reporting unlawful activity is illegal. Employees who object to or refuse to participate in a policy, practice or activity that is unlawful, fraudulent, criminal or incompatible with a clear mandate of public policy concerning the public health, safety or welfare or protection of the environment are also protected from retaliatory action.

We do not permit any form of intimidation, harassment, discrimination or retaliation by any employee, contractor, subcontractor or agent of the Company against you because of any lawful act done to:

1. provide information or otherwise assist in an investigation of conduct you reasonably believe is a violation of any law, rule, or regulation, or of any Company policy; or

2. testify, participate in or otherwise assist in a proceeding filed or to be filed relating to a violation of any law, rule or regulation.

Any individual reporting a violation or potential violation pursuant to this Policy will be treated with dignity and respect. Nothing in this Policy in any way prohibits or is intended to restrict or impede employees from discussing the terms and conditions of their employment with co-workers or union representatives/exercising protected rights under Section 7 of the National Labor Relations Act/exercising protected rights to the extent that such rights cannot be waived by agreement, or otherwise disclosing information as permitted by law.

It is also important to note that this Policy does not shield employees from the consequences of making reports in bad faith. Disciplinary action may also be taken against an employee who:

1. submits a report or complaint containing a statement, allegation, document or fact that the individual knew or should have known was false or misleading; or

2. uses the complaint procedure for purposes other than the good faith resolution of a report or complaint of a violation of this Policy.

**DISCIPLINARY ACTION**

This Policy will be enforced throughout the Company and violations will be dealt with promptly, including subjecting persons to corrective and/or disciplinary action such as dismissal or removal from a position or office or termination of employment. Employees who fail to comply with this Policy or to cooperate with any compliance investigation will be subject to disciplinary action. Employees who direct, approve or condone violations of this Policy or have knowledge of a violation and do not act promptly to report it, will also be subject to disciplinary action.

**CHANGES TO THIS POLICY**

Our Board reserves the right in its sole discretion to modify or grant waivers to this Policy. Any amendments or waiver may be publicly disclosed if required by applicable laws, rules and regulations.