

On November 21, 2024, the Board of Directors of Enanta Pharmaceuticals, Inc. (the “Company”) approved certain amendments to its Code of Business Conduct and Ethics (as amended, the “Code”). The Code was amended to: (i) cover third parties, such as agents, consultants, distributors, suppliers, vendors, independent contractors and temporary employees, (ii) require officers and directors to complete an annual conflict-of-interest disclosure report, (iii) add provisions covering human rights, anti-trust and competition and anti-money laundering and (iv) expand whistleblower protections. The Code applies to all officers, directors and employees of the Company as well as third parties conducting business with the Company and includes the information required by Nasdaq listing standards and Item 406 of Regulation S-K. The Code, as amended, follows this cover page.

ENANTA PHARMACEUTICALS, INC. CODE OF BUSINESS CONDUCT AND ETHICS

Enanta is committed to ethical practices and compliance with applicable laws and regulations that govern all areas of our operations. This Code of Business Conduct and Ethics (this “Code”) sets forth legal and ethical standards of conduct for employees, officers and directors of Enanta Pharmaceuticals, Inc., as well as third parties conducting business with the Company.

Our success depends on our ability to operate in an ethical and compliant manner. This Code is intended to deter wrongdoing and to promote:

- honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- full, fair, accurate, timely and understandable disclosure in reports and documents that Enanta files with, or furnishes to, the Securities and Exchange Commission (the “SEC”), and in other public communications made by Enanta;
- compliance with applicable governmental laws, rules and regulations;
- prompt internal reporting of violations of this Code to an appropriate person or persons identified herein; and
- accountability for adherence to this Code.

This Code is not intended to be an exhaustive description of Enanta’s policies. Enanta has adopted policies and procedures addressing certain topics in this Code in more detail and may adopt additional policies from time to time.

If you have any questions regarding this Code or its application to you in any situation, you should contact your supervisor or our Chief Financial Officer or General Counsel.

Compliance with Laws, Rules and Regulations; Violations; No Retaliation

- Compliance. Enanta requires that all employees, officers and directors comply with all laws, rules and regulations applicable to Enanta 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. Third parties, such as agents, consultants, distributors, suppliers,

vendors, independent contractors and temporary employees, are also expected to live up to the principles of this Code. Managers who supervise our external business partners are responsible for ensuring that they understand our standards.

- **Reporting Violations.** If you perceive a violation of this Code and/or any law, rule or regulation by Enanta, you are required to promptly report the matter to a supervisor or to Enanta's Chief Financial Officer. While it is Enanta's desire to address matters internally, nothing in this Code should discourage you from reporting any illegal activity, including any violation of the securities laws, antitrust laws, environmental laws or any other federal, state or foreign law, rule or regulation, to the appropriate regulatory authority. This vigilance allows us to build on the compliant and ethical conduct that is a cornerstone of Enanta's success.
- **No Retaliation.** Employees, officers and directors shall not discharge, demote, suspend, threaten, harass or in any other manner discriminate or retaliate against an employee because such person who, acting in good faith on the basis of a reasonable belief, reports any suspected violation.

Compliance with Enanta Policies, Verification and Training

Every employee, officer, director and third party with whom Enanta conducts business is expected to comply with all Enanta policies and rules as in effect from time to time, including those in the Enanta Employee Handbook.

As a condition of employment, all employees are required to acknowledge their receipt and understanding of this Code when they are hired and are encouraged to review it annually thereafter. Additionally, you must immediately report good-faith and reasonable suspicions related to a potential violation of any section of the Code.

Conflicts of Interest

Employees, officers and directors must act in the best interests of Enanta. You must refrain from engaging in any activity or having a personal interest that presents a "conflict of interest" and should seek to avoid even the appearance of a conflict of interest. A conflict of interest occurs when your personal interest interferes with the interests of Enanta. A conflict of interest can arise whenever you, as an employee, officer or director, take action or have an interest that prevents you from performing your Enanta duties and responsibilities honestly, objectively and effectively.

For example:

- No employee, officer or director shall perform services as an employee, officer, director, consultant, advisor or in any other capacity for a competitor of Enanta, other than services performed at the request of Enanta;
- No employee, officer or director shall have a financial interest in a competitor of Enanta, other than a financial interest representing less than one percent (1%) of the outstanding shares of a publicly held company; and
- No employee, officer or director shall use such person's position with Enanta to influence a transaction with a supplier or customer in which such person has any personal interest, other than a financial interest representing less than one percent (1%) of the outstanding shares of a publicly held company.

Officers and directors are required to complete a conflict-of-interest disclosure when they join and annually thereafter. You must also report a conflict at any time a potential conflict of interest arises.

Reporting Conflicts of Interest. It is your responsibility to disclose any transaction or relationship that reasonably could be expected to give rise to a conflict of interest to our Chief Financial Officer or, if you are an executive officer or director, to the Chair of the Audit Committee of our Board of Directors, who shall be responsible for determining whether such transaction or relationship constitutes a conflict of interest.

Self-Reporting Related Person Transactions. Enanta also has a Related Person Transactions Policy for transactions including any executive officer, director, director nominee, 5% stockholder or any family or household member of any of the foregoing. This policy is available on Enanta's Intranet.

Insider Trading

Employees, officers and directors who have material, non-public information about Enanta or other companies, including our suppliers and customers, as a result of their relationship with Enanta are prohibited by law and Enanta policy from trading in securities of Enanta or such other companies, as well as from communicating such information to others who might trade on the basis of that information. To help you manage your Enanta equity awards in compliance with securities laws and to ensure that you do not engage in prohibited insider trading and avoid even the appearance of an improper transaction, Enanta has adopted a Securities Trading Policy, which is available on Enanta's Intranet. You are expected to become familiar with this policy.

If you are uncertain about the constraints on your purchase or sale of any Enanta securities or the securities of any other company that you are familiar with by virtue of your relationship with Enanta, you should consult with our Chief Financial Officer or our General Counsel before making any such purchase or sale.

Confidentiality

Handling Confidential Information. Employees, officers and directors of Enanta must maintain the confidentiality of confidential information entrusted to them by Enanta or other companies, including our suppliers and customers, except when disclosure is authorized by a supervisor or legally mandated. Unauthorized disclosure of any confidential information is prohibited. Additionally, employees should take appropriate precautions to ensure that confidential or sensitive business information, whether it is proprietary to Enanta or another company, is not communicated within Enanta except to employees who have a need to know such information to perform their responsibilities for Enanta.

Inquiries from Outside of Enanta. Third parties may ask you for information concerning Enanta. Subject to the exceptions noted in the preceding paragraph, employees, officers and directors (other than Enanta's authorized spokespersons) must not discuss internal Enanta matters with, or disseminate internal Enanta information to, anyone outside Enanta, except as required in the performance of their Enanta duties and, if appropriate, after a confidentiality agreement is in place. This prohibition applies particularly to inquiries concerning Enanta from the media, market professionals (such as securities analysts, institutional investors, investment advisers, brokers and dealers) and security holders.

Authorized Spokespersons. All responses to inquiries on behalf of Enanta must be made only by Enanta'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 Enanta's authorized spokespersons. Enanta's policies with respect to public disclosure of internal matters are described more fully in Enanta's Disclosure Policy, which is available on Enanta's Intranet.

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

Honest and Ethical Conduct and Fair Dealing

Employees, officers and directors should endeavor to deal honestly, ethically and fairly with Enanta's suppliers, customers, competitors and employees. Statements regarding

Enanta'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.

Human Rights

Enanta recognizes the importance of maintaining and promoting the fundamental human rights of employees and subcontractors by operating under programs and policies that:

- promote a workplace free of discrimination and harassment;
- prohibit child labor, forced labor and human trafficking;
- provide fair and equitable wages and benefits in accordance with local laws;
- provide safe working conditions; and
- recognize employees' rights to freedom of association.

Enanta has zero-tolerance for human rights violations.

Protection and Proper Use of Corporate Assets

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

Employees, officers and directors must advance Enanta's legitimate interests when the opportunity to do so arises. You must not take for your own benefit any personal opportunities that are discovered through your position with Enanta or through the use of property or information of Enanta.

Limitations on Gifts and Gratuities

Gifts to Others. The use of Enanta funds or assets for gifts, gratuities or other favors to government officials is prohibited, except to the extent such gifts, gratuities or other favors are in compliance with applicable law, insignificant in amount and not given in consideration or expectation of any action by the recipient. The use of Enanta funds or assets for gifts to any customer, supplier or other person doing or seeking to do business with Enanta is prohibited, except to the extent such gifts are in compliance with the policies of both Enanta and the recipient and are in compliance with applicable law.

Receiving Gifts. Employees, officers and directors must not accept or permit any member of such person's immediate family to accept, any gifts, gratuities or other favors from any customer, supplier or other person doing or seeking to do business with Enanta, other than items of insignificant value. Any gifts that are not of insignificant value should be returned immediately and reported to your supervisor. If immediate return is not practical, they should be given to Enanta for charitable disposition or such other disposition as Enanta, in its sole discretion, believes appropriate.

Entertainment. Common sense and moderation should prevail in business entertainment engaged in on behalf of Enanta. Employees, officers and directors should provide, or accept, business entertainment to or from anyone doing business with Enanta only if the entertainment is infrequent, modest, intended to serve legitimate business goals and in compliance with applicable law.

Kickbacks. Bribes and kickbacks are criminal acts, strictly prohibited by law. You must not offer, give, solicit or receive any form of bribe or kickback anywhere in the world. The Foreign Corrupt Practices Act prohibits giving anything of value, directly or indirectly, to officials of foreign governments or foreign political candidates in order to obtain or retain business.

Accuracy of Books and Records and Public Reports

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

Maintaining Books and Records. All Enanta 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 Enanta shall conform to generally accepted accounting principles and Enanta'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 Enanta's books or records for any reason, and no disbursement of corporate funds or other corporate property shall be made without adequate supporting documentation and without being in compliance with Enanta's Travel & Related Expenses Reimbursement Policy.

SEC Reporting. It is the policy of Enanta to provide full, fair, accurate, timely and understandable disclosure in reports and documents filed with, or submitted to, the Securities and Exchange Commission and in other public communications.

Antitrust and Competition

Antitrust laws are complex and cover a broad range of conduct that might be illegal. In general, antitrust laws prohibit making agreements or sharing information with competitors on items including product plans, pricing, marketing strategies and profit/profit margins. Enanta complies with all applicable antitrust laws and requires that its employees do the same. If an employee intends to participate in a trade association or serve on a standard-setting body related to our industry, the employee must not share confidential or sensitive pricing or other non-public information with our competitors. If an employee has any questions, they should consult Enanta's General Counsel or Chief Financial Officer *before* sharing information or communicating with anyone outside of Enanta.

Anonymous Reporting of Concerns Regarding Accounting or Auditing Matters

Employees with concerns regarding questionable accounting or auditing matters or complaints regarding accounting, internal accounting controls or auditing matters may confidentially, and anonymously if they wish, submit such concerns or complaints in writing to the Chair of the Audit Committee at Enanta Pharmaceuticals, Inc., 4 Kingsbury Avenue, Watertown, MA 02472; or via telephone at 833-290-0001; or online at <https://www.lighthouse-services.com/enanta>. See "Reporting and Compliance Procedures." All such concerns and complaints will be forwarded to the Audit Committee of our Board of Directors, unless they are determined to be without merit by our Chief Financial Officer and the Chair of the Audit Committee. In any event, a record of all complaints and concerns received will be provided to the Audit Committee each fiscal quarter. Any such concerns or complaints may also be communicated, confidentially and, if you desire, anonymously, directly to the Chairman of the Audit Committee of the Board of Directors.

The Audit Committee will evaluate the merits of any concerns or complaints received by it and authorize such follow-up actions, if any, as it deems necessary or appropriate to address the substance of the concern or complaint.

Enanta will not discipline, discriminate against or retaliate against any employee who makes a good faith report of known or suspected acts of misconduct or other violations of this Code.

Anti-Money Laundering

Money laundering involves the concealment of the origins of money gained through illegal activity, including drug transactions, bribery, terrorism or fraud, and is a crime that can result in fines and/or imprisonment. Enanta is committed to complying fully with all anti-money laundering laws and regulations. Enanta strives to conduct business only with reputable parties

involved in legitimate business activities using funds derived from legitimate sources. Enanta's integrity and reputation can be severely damaged by failing to detect those business relationships and transactions that place the company at risk. Promptly notify the Chief Financial Officer or General Counsel of any suspicious activity.

Dealings with Independent Auditors

No employee, officer or director shall, directly or indirectly, make or cause to be made a materially false or misleading statement to an accountant in connection with (or omit to state, or cause another person to omit to state, any material fact necessary in order to make statements made, in light of the circumstances under which such statements were made, not misleading to, an accountant in connection with) any audit, review or examination of Enanta's financial statements or its internal controls over financial reporting, or the preparation or filing of any document or report with the SEC. No employee, officer or director shall, directly or indirectly, take any action to coerce, manipulate, mislead or fraudulently influence any independent public or certified public accountant engaged in the performance of an audit or review of Enanta's financial statements.

Waivers of this Code of Business Conduct and Ethics

Employee Requests. While some of the policies contained in this Code must be strictly adhered to and no exceptions can be allowed, in other cases exceptions may be appropriate. Any employee or officer who believes that a waiver of any of these policies is appropriate in their case should first contact their immediate supervisor. If the supervisor agrees that a waiver is appropriate, the approval of our Chief Financial Officer must be obtained. Our Chief Financial Officer shall be responsible for maintaining a record of all requests by employees or officers for waivers of any of these policies and the disposition of such requests.

Executive Officer and Outside Director Requests. Any executive officer or member of our Board of Directors who seeks a waiver of any of these policies should contact our Chairman of the Board. Any waiver of this Code for any executive officer or any member of our Board of Directors or any change to this Code that applies to any such executive officer or member of our Board of Directors may be made only by the Board of Directors of Enanta and will be disclosed as required by law or stock exchange regulation.

Third party Requests. While some of the policies contained in this Code must be strictly adhered to and no exceptions can be allowed, in other cases exceptions may be appropriate. Any third party or business partner who believes that a waiver of any of these policies is appropriate should contact Enanta's Chief Financial Officer.

Reporting and Compliance Procedures

Duty to Report. Every employee, officer and director has the responsibility to ask questions, seek guidance, report suspected violations and express concerns regarding compliance with this Code. Any employee, officer or director who knows or believes that any other employee or representative of Enanta has engaged or is engaging in Enanta-related conduct that violates applicable law or this Code should report such information to the applicable supervisor or to our Chief Financial Officer or our General Counsel, as described below. You may report such conduct openly or anonymously without fear of retaliation.

No Retaliation. Enanta will not discipline, discriminate against or retaliate against any employee who reports such conduct in good faith, or any employee who cooperates in any investigation or inquiry regarding such conduct. Any supervisor who receives a report of a violation of this Code must immediately inform our Chief Financial Officer or our General Counsel.

How to Report Violations. You may report violations of this Code, on a confidential or anonymous basis, by contacting our Chief Financial Officer or our General Counsel by mail at Enanta Pharmaceuticals, Inc., 4 Kingsbury Avenue, Watertown, MA 02472 or by email to our Chief Financial Officer, our General Counsel, or to the Chair of the Audit Committee of the Board of Directors at Enanta Pharmaceuticals, Inc., 4 Kingsbury Avenue Watertown, MA 02472; or via telephone at 833-290-0001; or online at <https://www.lighthouse-services.com/enanta>. While we prefer that you identify yourself when reporting violations so that we may follow up with you, as necessary, for additional information, you may leave messages anonymously if you wish.

Evaluation and Disposition of Reported Violations. If our Chief Financial Officer or our General Counsel receives information regarding an alleged violation of this Code, such officer shall, as appropriate, (a) evaluate such information, (b) if the alleged violation involves an executive officer or a director, inform our Chief Executive Officer and the Chair of the Audit Committee of the Board of Directors of the alleged violation, (c) determine whether it is necessary to conduct an informal inquiry or a formal investigation and, if so, initiate such inquiry or investigation and (d) report the results of any such inquiry or investigation, together with a recommendation as to disposition of the matter, to our Chief Executive Officer for action, or if the alleged violation involves an executive officer or a director, report the results of any such inquiry or investigation to the Chair of the Audit Committee of the Board of Directors. Employees, officers and directors are expected to cooperate fully with any inquiry or investigation by Enanta regarding an alleged violation of this Code. Failure to cooperate with any such inquiry or investigation may result in disciplinary action, up to and including discharge.

Enanta shall determine whether violations of this Code have occurred and, if so, shall determine the disciplinary measures to be taken against any employee who has violated this Code. In the event that the alleged violation involves an executive officer or a director, our Chief Executive Officer or the Chair of the Audit Committee of the Board of Directors, respectively, shall determine whether a violation of this Code has occurred and, if so, shall determine, with such consultation with the Audit Committee and/or the Board of Directors as such person may deem appropriate, the disciplinary measures to be taken against such executive officer or director.

Consequences of Failing to Comply with this Code. Failure to comply with the standards outlined in this Code will result in disciplinary action including, but not limited to, reprimands, warnings, probation or suspension without pay, demotions, reductions in salary, discharge and restitution. Certain violations of this Code may require Enanta to refer the matter to the appropriate governmental or regulatory authorities for investigation or prosecution. Moreover, any supervisor who directs or approves of any conduct in violation of this Code, or who has knowledge of such conduct and does not immediately report it, also will be subject to disciplinary action, up to and including discharge.

Whistleblower Protection. Nothing contained in this Code, any agreement you have entered into with Enanta, or any other Enanta policy limits your ability, with or without notice to Enanta, 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 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) 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 (v) 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). Enanta 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 the Company 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 Enanta.

Distribution and Amendment of this Code

This Code shall be distributed to each new employee, officer and director of Enanta upon commencement of an employment or other relationship with Enanta. Following distribution of this Code, each new employee, officer and director shall certify that such employee has received, read and understood the Code and agrees to comply with its terms. This Code shall also be distributed electronically each year to each employee, officer and director of Enanta.

Enanta reserves the right to amend, alter or terminate this Code at any time for any reason. The most current version of this Code is available on Enanta's intranet and will be provided in hard copy if you request it from our Human Resources Director.

This document is not an employment contract between Enanta and any of its employees, officers or directors.

Form of Certification

I, _____ do hereby certify that:

- 1. I have received and carefully read the Code of Business Conduct and Ethics of Enanta.
- 2. I understand the Code of Business Conduct and Ethics.
- 3. I will comply with the terms of the Code of Business Conduct and Ethics.
- 4. Except as noted below, I do not know or believe that any employee or representative of Enanta has engaged or is engaging in Enanta-related conduct that violates applicable law or the Code of Business Conduct and Ethics.

Exceptions (describe, or state "None"):

Date: _____

Signature: _____

EACH NON-EMPLOYEE DIRECTOR IS REQUIRED TO SIGN, DATE AND RETURN THIS CERTIFICATION TO OUR GENERAL COUNSEL.