

## ANIKA THERAPEUTICS, INC.

### Communication Policies

The Board of Directors (the “Board”) of Anika Therapeutics, Inc. (“Anika”) has approved these Communication Policies to ensure that communications to the public by or on behalf of Anika are:

- factual and accurate;
- disseminated on a timely basis and in a manner reasonably designed to provide broad, non-exclusionary distribution of information to the public; and
- made in a manner that complies with applicable laws and regulations.

These Communication Policies, which are components of Anika’s overall disclosure controls and procedures, will be evaluated from time to time by the Board and may be revised as necessary.

These Communication Policies apply to all employees of Anika and its subsidiaries and to all members of the Board (Anika’s “representatives”). These Communication Policies do not replace the primary responsibility of each representative to understand and comply with the prohibitions on selective disclosure and other disclosure obligations under the federal securities laws. All representatives should also carefully review Anika’s Insider Trading Policy and Code of Business Conduct and Ethics, which also contain provisions relating to the proper disclosure of material information relating to Anika.

These Communication Policies and any agreements between the Anika and any current or former employees are not intended to limit or interfere with, in any way, any employee’s ability, with or without notice to the Anika, 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) 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). Anika 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 Anika 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 Anika.

If you have any questions on these Communication Policies or with respect to your obligations under federal securities laws generally, please contact the Chief Executive Officer (“CEO”), Chief Financial Officer (“CFO”), General Counsel (“GC”), or the head of Investor Relations.

### **1. AUTHORIZED SPOKESPERSONS AND CORPORATE COMMUNICATIONS**

*Purpose:*

Anika restricts the number of persons who are authorized to communicate (including responding to inquiries) on behalf of Anika (the “Authorized Spokespersons”) with the media, industry and trade organizations, market

professionals (for example, securities analysts, institutional investors, investment advisers, brokers and dealers) and shareholders in order to (a) limit the persons whose statements trigger Anika’s public disclosure obligations under Regulation FD (see “COMPLIANCE WITH LAWS—*Selective Disclosure Rule*” below) of the Securities and Exchange Commission (the “SEC”), (b) help ensure that all communications to members of the public are made by persons who are fully informed about both Anika and the guidelines and risks applicable to external communications, and (c) reduce the risk of inconsistent statements to the public.

*Communications with  
Media, Market Professionals  
and Shareholders:*

The *Authorized Spokespersons* consist of:

- The CEO;
- The CFO;
- The GC;
- The head of Investor Relations; and
- Other persons specifically designated in writing by the above individuals to speak with respect to a particular topic or respond to specific inquiries.

Anika shall maintain procedures designed to ensure that the Authorized Spokespersons are kept informed of material developments affecting Anika.

Anika representatives (other than the Authorized Spokespersons) who receive any inquiries from the media, market professionals or shareholders shall not respond to such inquiries but shall refer the questioner to an Authorized Spokesperson. Anika representatives assigned to Anika’s investor relations and marketing groups may, however, respond to routine inquiries for publicly available information in a manner consistent with guidelines established from time to time or guidance provided by an Authorized Spokesperson.

*Prohibited Communications:*

Anika representatives (other than the Authorized Spokespersons) shall not discuss nonpublic Anika matters with, or disseminate nonpublic Anika information to, anyone outside Anika, except in the ordinary course of business as required in the performance of Anika duties and in accordance with appropriate confidentiality arrangements.

Except in the ordinary course of business as required in the performance of their Anika duties, Anika representatives shall not respond to inquiries from anyone outside of Anika about Anika’s customers, suppliers or business partners without prior approval from an Authorized Spokesperson.

*Communications Using  
Social Media:*

The following guidelines apply to the use by Authorized Spokespersons of social media on authorized corporate channels. For guidance applicable to personal use of social media, see Anika’s Social Media Policy.

As used in these Communication Policies, “social media” means any digital technology or practice that enables people to use, create and share content, opinions and insights in conversations over the internet, including

not only communication channels traditionally identified as social media such as Facebook, LinkedIn, TikTok, Truth Social and X (formerly known as Twitter), Instagram, YouTube, blogs, wikis, chatroom postings and website comments.

The legal standards applicable to press releases and other public communications by Anika are equally applicable to Anika's social media communications. Accordingly, Anika shall adhere to the following guidelines with respect to its social media communications.

Disclosure:

Anika may use social media channels to publicly disseminate material nonpublic information (as defined below under "DISCLOSURE OF MATERIAL NONPUBLIC INFORMATION—*Definition of 'Material' and 'Nonpublic'*") only if:

- Anika has provided investors with advance notice that the social media channels may be used to disseminate information;
- the social media channels disseminate the information in a manner that makes it available to the securities marketplace generally; and
- there has been a reasonable waiting period for investors and the securities marketplace to react to the disseminated information.

If those requirements have not been met, no material nonpublic information shall be disseminated via social media until after the information has been publicly disseminated through an SEC filing, a press release or another means satisfying Regulation FD.

Administration:

The Authorized Spokespersons shall be responsible for managing the administration of Anika's social media communications. Social media communications shall be subjected to the same review and level of care as all other public statements made by Anika. The Authorized Spokespersons may delegate the administration to other Anika representatives, including in the Marketing organization, who shall have day-to-day responsibility for managing Anika's social media activities with respect to information that is not material and nonpublic (including advertising, promotions, product training, etc.).

Anika shall maintain records of all online social media communications and shall preserve all communications on Anika- sponsored social media channels in accordance with applicable law or regulation and any document retention policy developed by Anika.

All social media accounts created or used by employees on behalf of Anika shall belong solely to Anika. This includes all log-in information, passwords and content associated with each account, including followers and contacts.

Practices:

In communicating by social media, an Authorized Spokesperson or their designee shall ensure that Anika is adhering to the following disclosure practices:

- ensure that it is clear that the communication is coming from or made on behalf of Anika by, for example, stating that it is "sponsored by Anika" or including Anika's logo, if it is not evident from the source of the post that it is being made by Anika;
- take care to protect proprietary, confidential information and trade secrets of Anika and Anika's business partners;
- seek to provide information and add value to shareholders, potential

- investors, employees or business partners with each communication;
- ensure the communication is factually accurate and avoid disparaging comments that could affect Anika’s credibility;
- portray a balanced discussion of the subject matter, for example by including the full context of a communication or, if space is limited, linking to full-context posts or discussions on Anika’s website or other social media channels; and
- do not link to, “retweet” or “like” posts or information from non-Anika sources unless an Authorized Spokesperson or their designee would be comfortable, consistent with these guidelines, making those statements on Anika-sponsored social media channels.

*Website:*

The legal standards applicable to press releases and other public communications by Anika are equally applicable to Anika’s website. Accordingly, Anika shall adhere to the following guidelines with respect to its website.

Disclosure:

Anika’s website may be used to publicly disseminate material nonpublic information only if:

- Anika has provided investors with advance notice that the website may be used to disseminate information;
- the website disseminates the information in a manner that makes it available to the securities marketplace generally; and
- there has been a reasonable waiting period for investors and the securities marketplace to react to the posted information.

If those requirements have not been met, no material nonpublic information (as defined below) shall be posted on Anika’s website until after the information has been publicly disseminated through an SEC filing, a press release or another means satisfying Regulation FD.

Administration:

The CEO, the CFO, or their designees shall be responsible for managing the administration of Anika’s website, including establishing a process for reviewing and approving all material before it is posted on Anika’s website. Information provided on the website shall be subjected to the same review and level of care as all other public statements made by Anika, and all information on the website shall be reviewed periodically for the purpose of updating or deleting inaccurate or misleading information. Older information that Anika wishes to retain for informational purposes shall be segregated into an archive section.

*Third-Party Links:*

Anika shall not include reports of financial analysts, or hyperlinks to such reports, on Anika’s website. No other hyperlink shall be included on Anika’s website without the prior approval of an Authorized Spokesperson or their designee.

*Third-Party Consents:*

Anika shall obtain any approvals or consents required in connection with the posting of third-party information and shall take other appropriate steps to avoid posting materials on its website that it does not own or have a valid right to use.

## 2. “NO COMMENT” POLICY

### *Purpose:*

Anika has adopted and follows a “no comment” policy with respect to inquiries or rumors concerning:

- prospective developments or transactions involving Anika or its business (including inquiries or rumors relating to the status of discussions, or Anika’s plans, with respect to an acquisition of or by Anika);
- prospective developments regarding the status or timing of the development, regulatory approvals, manufacture or commercialization of Anika’s products; or
- projections of, or guidance regarding, future financial performance by Anika, including reaffirmation of any previously provided projections or earnings guidance.

The “no comment” policy enables the Authorized Spokespersons to respond to such inquiries or rumors in a manner that avoids premature disclosure of a potential development or transaction and that minimizes the awkwardness of a refusal to respond. Without this policy, an Authorized Spokesperson would not be able to respond truthfully if a potential development or transaction is pending but not yet ripe for public disclosure. The “no comment” policy also helps Anika avoid an obligation to update prior public statements when, as a result of intervening events, the prior response is no longer accurate.

### *Permitted Responses to Inquiries and Rumors:*

The Authorized Spokespersons shall respond to any inquiry or rumor regarding the matters set forth under “—*Purpose*” above only with a statement to the effect that it is the policy of Anika (a) not to comment on or respond to inquiries or rumors concerning prospective corporate developments or transactions and (b) not to reaffirm, other than through appropriate public disclosure, previous statements or guidance about future financial performance. If the source of a rumor is found to be internal, Anika’s counsel should be consulted to determine the appropriate response.

### *Prohibited Communications:*

Until such time as Anika has made appropriate public disclosure, as authorized by the Board, the CEO or the CFO, no Authorized Spokesperson may comment on, or substantively respond to inquiries or rumors concerning, the matters set forth under “—*Purpose*” above. (Anika representatives other than the Authorized Spokespersons are prohibited from responding to any such inquiries or rumors as described in “AUTHORIZED SPOKESPERSONS AND CORPORATE COMMUNICATIONS” above.) A statement to the effect that an Authorized Spokesperson is “not aware of any information” or a denial by an Authorized Spokesperson that any development or transaction exists is inconsistent with the requirements of the “no comment” policy and, if inaccurate, could result in liability as a false and misleading statement.

### **3. DISCLOSURE OF MATERIAL NONPUBLIC INFORMATION**

*Purpose:*

Anika is committed, consistent with Regulation FD, to providing timely, orderly, consistent and credible material information to Anika's shareholders and potential investors. Anika has developed detailed guidelines and procedures for receiving requests for, and ultimately disclosing, material information. It is Anika's policy to comply with all applicable periodic reporting and disclosure requirements established by the SEC, including Regulation FD. To this end, Anika will disclose material information about Anika publicly and on a timely basis, as required by law.

*Definition of "Material" and "Nonpublic":*

Information concerning Anika is considered "*material*" if there is a substantial likelihood that a reasonable shareholder would consider the information important in making a decision to buy or sell Anika's securities. Stated another way, there must be a substantial likelihood that a reasonable shareholder would view the information as having significantly altered the "total mix" of information available about Anika. Material nonpublic information can include positive or negative information about Anika. Information concerning any of the following subjects, or Anika's plans with respect to any of these subjects, is the type of information that often is considered to be material information:

- Anika's revenues or earnings;
- a merger, acquisition, tender offer or joint venture involving Anika;
- a possible proxy fight;
- a change in the executive officers or directors;
- the public or private sale of a significant amount of securities of Anika;
- the establishment of a program to repurchase securities of Anika;
- a stock split;
- a cash or stock dividend;
- a new product approval or release, an important regulatory development (including clinical trial results), or a significant development, invention or discovery;
- the loss, delay or gain of a significant contract, sale or order or other important development regarding suppliers, resellers, sales channels or ultimate customers;
- an actual or threatened major litigation or regulatory or enforcement action involving Anika, or resolution of any such matter;
- contents of forthcoming publications that may affect the market price of Anika securities, including statements by securities analysts regarding Anika or its securities; or
- a change in, or dispute with, Anika's independent accountants.

This list is illustrative only and is not a comprehensive list of circumstances that could give rise to material information. When in doubt, Authorized Spokespersons should seek guidance from Anika's counsel. Information concerning Anika is considered to be "*nonpublic*" if it has not been disseminated in a manner making it available to investors generally.

*Manner of Disclosure:*

Anika shall make disclosures of material nonpublic information only:

- in a manner reasonably designed to provide broad, non-exclusionary distribution of the information to the public, such as by means of a press release that is distributed in a manner reasonably designed to ensure wide dissemination;
- on a conference call or in another forum that is accessible to the public and for which adequate advance notice has been provided;
- in a filing with the SEC on an appropriate form; or
- pursuant to a confidentiality agreement or by such other means that, after consultation with counsel, is believed to be in compliance with Regulation FD and other applicable laws.

*Forward-Looking*

*Financial Information:*

Except as may otherwise be determined from time to time by the Board, the CEO or the CFO, Anika shall provide the following guidance regarding Anika's expected future financial performance:

- on a quarterly basis in conjunction with its quarterly public announcement of earnings, targeted or projected revenue;
- on an annual basis in conjunction with its announcement of fourth quarter financial results, targeted or projected revenue for the next fiscal year; and
- such other key metrics of Anika's business that the Board, the CEO or the CFO determines from time to time is appropriate for public disclosure.

Anika shall include any forward-looking information described in the preceding paragraph either (a) in its quarterly earnings releases or (b) during the conference call following the earnings release, *provided* it provides adequate public notice of and access to that call. The CEO and the CFO shall establish guidelines as to the manner of providing such information designed to ensure consistent disclosure practices by Anika, reduce the risk of selective disclosure, and facilitate future responses to analysts and others seeking information that Anika does not wish to publicly disclose.

*Safe Harbor and Disclaimers:*

All public disclosures of financial or other forward-looking information shall, to the broadest extent practicable, invoke the safe harbor under The Private Securities Litigation Reform Act, which requires, among other things, that (a) oral forward-looking statements cite readily available written materials (such as SEC filings) that include meaningful cautionary statements and (b) written forward-looking statements be accompanied by meaningful cautionary statements. In order to facilitate the invocation of the safe harbor with respect to oral forward-looking statements, Anika shall, in accordance with applicable SEC requirements, keep the risk factors included in its SEC filings up to date so as to accurately reflect the current risks and uncertainties confronting Anika.

Except to the extent imposed by law, Anika shall not undertake, and shall specifically disclaim, any obligation to update any forward-looking information provided by Anika. As described in "NO COMMENT POLICY" above, Anika will not respond, except by means of an appropriate public disclosure, to any inquiries seeking reaffirmation of such information at any date subsequent to the date as of which such information was provided.

*Conference Calls with  
Investment Community:*

Anika's conference calls with securities analysts and investors, such as the calls that follow quarterly earnings releases, generally shall be structured as public forums in which Anika is able to provide meaningful information on a broad, non-exclusionary basis, while minimizing, to the extent practicable, legal risk to Anika. To this end, Anika shall:

- provide advance public notice of the conference call, with the means of providing notice, and the contents and timing of the notice, being determined by the Authorized Spokespersons in compliance with Regulation FD and other legal requirements.
- allow broad participation in the conference call, although the Authorized Spokespersons may, to the extent they determine to be appropriate, limit the ability of some or all participants to raise questions during the call;
- hold the conference call only after public dissemination of a related press release;
- script the presentation to be made during the conference call, with such review of the script by Anika's counsel and independent accountants as the Authorized Spokespersons determine to be desirable;
- comply with rules for non-GAAP financial measures, including Regulation G and Item 10(e) of Regulation S-K;
- include in the conference call (a) a "safe harbor" statement under The Private Securities Litigation Reform Act relating to forward- looking statements, (b) a disclaimer of the duty to update, and (c) a statement about the use of non-GAAP financial measures and the website location where Anika has posted any information required by Regulation G;
- make replays of the conference call available for a limited time, as determined by the Authorized Spokespersons after consultation with counsel; and
- neither distribute a transcript of the conference call to anyone other than Anika representatives nor post such a transcript on Anika's website, unless required by law or regulation.

*Analyst and Investor Meetings:*

The Authorized Spokespersons may respond to inquiries from, or meet with, securities analysts and investors in nonpublic forums in order to assist the analysts and investors in gaining a better understanding of Anika and to provide investors with the opportunity to meet and assess management. Anika shall not, however, intentionally disclose any material nonpublic information in those nonpublic interactions.

In addition, the following guidelines shall apply specifically to dealings with securities analysts:

- Analyst reports and earnings models may be reviewed only by the CEO or the CFO and only to correct errors that can be corrected by referring to publicly available, historical, factual information or to correct any mathematical errors. No Anika representatives, other than the CEO or the CFO, shall conduct any such review, and no Authorized Spokesperson shall communicate to any analyst any other type of feedback or guidance on any analyst report.
- Anika shall not distribute any analyst report to shareholders, prospective investors, the media or other external parties.



- No Anika representatives shall endorse or confirm, or express “comfort” with, any projections contained in an analyst report.

*Required Public Disclosures:*

If Anika determines that one of its representatives has disclosed material nonpublic information, the information must be disclosed promptly via a means reasonably designed to provide broad, non-exclusionary distribution to the public, such as a Form 8-K, a press release distributed through widely circulated news or wire services, or a posting of the information on Anika’s website if Anika has previously identified the site as a means of disclosing public information.

In the event of any *non-intentional* disclosure of material nonpublic information that creates a duty under Regulation FD to make a prompt public disclosure of such information, Anika shall publicly disclose such information as soon as reasonably practicable and in any event by the later of (a) 24 hours after the time an Anika official learns of the non-intentional disclosure and (b) the commencement of the next day’s trading of securities on the New York Stock Exchange.

In the event Anika learns that an Anika representative has *knowingly* disclosed material nonpublic information that creates a duty under Regulation FD to make a prompt public disclosure of such information, Anika shall make public disclosure of such information as soon as reasonably practicable.

*Dissemination of Information*

*Within Anika:*

Anika shall take reasonable steps to ensure that material nonpublic information is disseminated only to the Authorized Spokespersons, other officers and those employees who need to know such information in the performance of their Anika duties.

*Disclosure Committee:*

Anika may, in the discretion of the CEO and the CFO, establish and maintain a Disclosure Committee, whose responsibilities may be set forth in a committee charter, disclosure controls and procedures, or other similar documentation. Any Disclosure Committee typically shall review in advance all SEC filings as well as all press releases relating to Anika’s operating results or financial position.

#### **4. COMPLIANCE WITH LAWS**

*Selective Disclosure Rule:*

These Communication Policies are intended to be applied in a manner that is consistent with the requirements of Regulation FD, the SEC’s selective disclosure rule that regulates communications between public companies and certain specified persons (“Regulation FD Persons”), including:

- broker-dealers and persons associated with them, including investment analysts;
- investment advisers, certain institutional investment managers and their associated persons;
- investment companies, hedge funds and affiliated persons; and
- shareholders who it is reasonably foreseeable would trade on the basis of the information.

Regulation FD prohibits the disclosure of any material nonpublic information about Anika to Regulation FD Persons. In the event of any

uncertainty, Authorized Spokespersons should contact counsel before having conversations with Regulation FD Persons in order to review as much of the substance of the intended communication as possible, including slides and other prepared materials.

The prohibitions of Regulation FD do not apply to:

- *public information* that has been disseminated through the recognized channels of distribution calculated to reach the securities marketplace, provided investors have been afforded a reasonable period to react to the information;
- communications in the *ordinary course of business* among Anika representatives or with customers, suppliers, strategic partners, or press or government personnel;
- communications to *persons owing a duty of trust* to Anika, including counsel and financial advisers; or
- communications to *persons expressly agreeing to appropriate obligations of confidentiality*.

*Antifraud Rules:*

All public disclosures by Anika shall be made in compliance, with all applicable laws, including the antifraud provisions of Rule 10b-5 under the Securities Exchange Act of 1934. Rule 10b-5 makes it unlawful for anyone to engage in any deceptive or fraudulent act in connection with the purchase or sale of a security. Because the investing public may rely on statements by Anika in making decisions to purchase or sell Anika's common stock, virtually every public statement by Anika or its representatives may be deemed to be made in connection with the purchase or sale of Anika's common stock and may subject Anika to liability. One common type of violation of this rule is a material misstatement or omission by Anika in a public statement or press release. If Anika elects to make or issue any public statements, whether oral or in writing, such statements must be accurate and complete in all material respects, should not contain undue hyperbole, and should not unduly emphasize either positive or negative facts or issues to the exclusion of countervailing factors.

*Duty to Correct and  
Duty to Update:*

If Anika has publicly made an inaccurate or misleading statement, Anika has a "*duty to correct*" that statement. If Anika has publicly made a forward-looking statement that has subsequently become inaccurate or misleading due to changes in circumstances, Anika *may* have a "*duty to update*" that prior statement. The law is unsettled as to whether a company has a "*duty to correct*" a statement that was true and not misleading when made. While there may be circumstances in which it is necessary, under applicable legal requirements, or advisable, for investor relations reasons, for Anika to update prior forward-looking statements, Anika should try to avoid any actions or statements that voluntarily impose a duty to update upon Anika.

*NASDAQ Requirements:*

Notwithstanding any provision of these Communication Policies, the Authorized Spokespersons are authorized to make such disclosures as may be required to satisfy the rules and regulations of the NASDAQ Stock Market, after consultation with counsel.

*Insider Trading Liability:*

All Anika representatives are reminded that, in addition to the matters covered in these Communication Policies, Anika's internal policies and the federal securities laws prohibit:

- any employee who is aware of material, nonpublic information about Anika from purchasing or selling securities of Anika or from communicating such information to any other person under circumstances in which it is reasonably foreseeable that such person is likely to purchase or sell such securities; and
- any employee who is aware of material, nonpublic information about another company obtained directly or indirectly from that company in the course of performing his or her employment duties from purchasing or selling securities of such company or from communicating such information to any other person under circumstances in which it is reasonably foreseeable that such person is likely to purchase or sell such securities.

Every Anika employee should be familiar with Anika's Insider Trading Policy, a copy of which is available on Anika's website or upon request from the Legal Department.

*Public Offerings:*

Notwithstanding any provision of these Communication Policies, the Authorized Spokespersons are authorized, in connection with a public offering of securities by Anika, to make such disclosures (including through participation in road show meetings) as they may, in consultation with counsel, deem necessary or appropriate.

Adopted: October 6, 2015

Last Revised: December 7, 2023