

ANIKA THERAPEUTICS INC.

Code of Business Conduct and Ethics

I. Purpose and Scope

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

The Board is responsible for administering the Code. The Board has delegated day-to-day responsibility for administering and interpreting the Code to Anika’s General Counsel, who serves as the Code Compliance Officer. This Code applies to all Representatives and to all third parties doing business on behalf of Anika.

Anika expects its Representatives to exercise reasonable judgment when conducting Anika’s business. Anika encourages its Representatives to refer to this Code frequently to ensure that they are acting within both the letter and spirit of this Code. Anika also understands that this Code will not answer every problem you may encounter or address every concern you may have about conducting Anika’s business ethically and legally. In these situations, or if you otherwise have questions or concerns about this Code, Anika encourages you to speak with your supervisor (if applicable) or, if you are uncomfortable doing that, with a representative from the Human Resources Department or the Code Compliance Officer.

Anika’s Representatives may have other legal and contractual obligations to Anika. In addition, there are requirements in other Anika policies and in the Anika Employee Handbook that apply to how Anika business is conducted. This Code is not intended to reduce or limit the other obligations you may have to Anika in those documents. Instead, this Code should be viewed as imposing the *minimum standards* Anika expects from its Representatives in the conduct of Anika’s business.

II. Standards of Conduct

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

Anika requires that all Representatives comply with all laws, rules and regulations applicable to Anika 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 Anika, whether by its Representatives, or any third-party doing business on behalf of Anika, it is your responsibility to promptly report the matter to your supervisor and/or the Code Compliance Officer. Please see Anika’s *Whistleblower Policy*, which is available on Anika’s website, for information about Anika’s reporting processes and procedures, reporting policies, and various protections provided to Representatives who report concerns.

B. Conflicts of Interest

Anika recognizes and respects the right of its Representatives 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 Anika or their ability to act in Anika's best interests. In most, if not all, cases this will mean that Representatives must avoid situations that present a potential or actual conflict between their personal or outside professional interests and Anika's interests.

A "conflict of interest" occurs when a Representative's personal interest interferes with Anika's interests. Conflicts of interest can arise in many situations. For example, conflicts of interest can arise when a Representative takes an action or has an outside interest, responsibility or obligation that can make it difficult to perform the responsibilities of his or her position objectively or effectively in Anika's best interests. Conflicts of interest can also occur when a Representative or his or her immediate family member receives some personal benefit (whether improper or not) as a result of the Representative's position with Anika. Each individual's situation is different and in evaluating his or her own situation, a Representatives 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 Code Compliance Officer, who may notify the Board or a committee of the Board as appropriate. Actual or potential conflicts of interest involving a director or executive officer other than the Code Compliance Officer should be disclosed directly to the Code Compliance Officer. Actual or potential conflicts of interest involving the Code Compliance Officer should be disclosed directly to the Chief Executive Officer.

To help ensure that your outside activities do not impair or interfere with the performance of your duties to Anika or your ability to act in Anika's best interests, Anika has adopted a ***Conflict of Interest Policy***, which is available on Anika's website.

C. Insider Trading

Representatives who have material non-public information about Anika or other companies, including our suppliers and customers, as a result of their relationship with Anika are prohibited by law and Anika policy from trading in securities of Anika 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, Anika has adopted an ***Insider Trading Policy***, which is available on Anika's website.

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

D. Confidentiality

Confidential information generated and gathered in Anika's business plays a vital role in Anika's business, prospects and ability to compete. "Confidential information" includes all non-public information that might be of use to competitors or harmful to Anika or its suppliers or customers if disclosed. Subject to the protections set forth in Anika's Whistleblower Policy, Representatives must maintain the confidentiality of confidential information entrusted to them by Anika or other companies, including our suppliers and customers, except when disclosure is authorized by a supervisor or the Code Compliance Officer or is legally mandated. Unauthorized disclosure of any confidential information is prohibited. Additionally, Representatives should take appropriate precautions to ensure that confidential or sensitive business information, whether it is proprietary to Anika or another company, is not communicated within Anika except to employees who have a need to know such information to perform their responsibilities for Anika.

Third parties may ask you for information concerning Anika. Subject to the exceptions noted in the preceding paragraph and Anika's Whistleblower Policy, Representatives (other than Anika's specifically named authorized spokespersons) must not discuss internal company matters with, or disseminate internal company information to, anyone outside Anika, except as required in the performance of their duties for Anika and, if appropriate, after a confidentiality agreement is in place. This prohibition applies particularly to inquiries concerning Anika 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 Anika must be made only by Anika'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 Anika's authorized spokespersons. Anika's policies with respect to public disclosure of internal matters are described more fully in Anika's *Communications Policy*, which is available on Anika's website.

You also must abide by any lawful obligations that you may have to any 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 Anika and non-competition obligations. In addition, should your employment with Anika end, you must return all Anika confidential information, materials or property in your possession.

E. Honest and Ethical Conduct and Fair Dealing

Anika's policy is to promote high standards of integrity by conducting its affairs honestly and ethically. Representatives should endeavor to deal honestly, ethically and fairly with Anika's suppliers, customers, competitors and other employees. Statements regarding Anika's products and services, or those of its competitors, 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.

Anika does not permit or condone bribes, kickbacks or other improper payments, transfers or receipts. No Representative 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.

F. Protection and Proper Use of Corporate Assets

Loss, theft and misuse of Anika's assets have a direct impact on Anika's business and profitability, and such actions are prohibited. Representatives should seek to protect Anika's assets. Representatives must use Anika's assets and services solely for legitimate business purposes of Anika and not for any personal benefit or the personal benefit of anyone else. Any suspected incident of fraud or theft must immediately be reported to an employee's supervisor or the Code Compliance Officer.

G. Corporate Opportunities

Representatives owe a duty to Anika to advance its legitimate business interests when the opportunity to do so arises. Each Representative is prohibited from:

- diverting to himself or herself or to others any opportunities that are discovered through the use of Anika's property or information or as a result of his or her position with Anika unless that opportunity has first been presented to, and rejected by, Anika;
- using Anika's property or information or his or her position for improper personal gain; or
- competing with Anika.

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 Anika's funds must be coordinated through and approved by the Code Compliance Officer. Representatives may not, without the approval of the Code Compliance Officer, use any Anika funds for political contributions of any kind to any political candidate or holder of any national, state or local government office. Representatives may make personal contributions, but should not represent that they are making contributions on Anika's behalf. Specific questions should be directed to the Code Compliance Officer.

I. Interactions with Healthcare Professionals

With regard to healthcare professionals ("HCPs"), no Representative shall offer or pay any remuneration, in any form, to any HCP to induce such person to purchase, lease, order, or arrange for, refer or recommend purchasing, leasing, or ordering any good, facility, service, or item offered or provided by Anika. Anika has established a global compliance program focused on interactions between Anika Representatives, or any other entity representing Anika, and HCPs, as those interactions are highly regulated by global anti-bribery laws, anti-kickback laws, transparency laws, and other similar laws, regulations and standards of conduct. Anika's full policy on interactions with healthcare professionals is set forth in Anika's *Manual on Interactions with*

Healthcare Professionals (the “HCP Manual”) which can be found on Anika’s internal intranet site or requested from the Legal Department.

J. Travel and Business Expenses

Anika will reimburse Representatives all ordinary, necessary and reasonable travel and business expenses when directly connected to the transaction of company business. There will be no financial loss or gain to an employee while traveling on company business. Representatives are expected to exercise prudent business judgment regarding expenses covered by this policy. All expenditures must stand the test of reasonableness. All business and travel related expenses must be submitted for reimbursement via Concur Expense and supported by receipts if and as required by Anika’s *Travel and Expense Policy*. Anika’s full policy on travel and business expenses is set forth in Anika’s *Travel and Expense Policy* which can be found on Anika’s internal intranet site or requested from the Human Resources, Finance or Legal Department.

As discussed above, Anika’s HCP Manual governs Anika’s interactions with HCPs globally. The HCP Manual contains specific rules and requirements with respect to meals, travel, gifts, entertainment, grants, training, donations, advertising, etc., when interacting with an HCP. All Representatives should carefully review the requirements in the HCP Manual, as it contains additional requirements and procedures, some of which over-ride certain sections in Anika’s Travel and Expense Policy with respect to HCPs.

K. 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. Anika’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 Anika, and ensure that Anika and all third parties representing Anika or otherwise acting on its behalf are in compliance at all times.

L. Accuracy of Records

Representatives must honestly and accurately report all business transactions. You are responsible for the accuracy of your records and reports. Accurate information is essential to Anika’s ability to meet legal and regulatory obligations.

All Company 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. Anika’s financial statements shall conform to generally accepted accounting rules and Anika’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 Anika’s books or records for any reason, and no disbursement of corporate funds or other corporate property shall be made without adequate supporting documentation.

M. Quality of Public Disclosures

Anika is committed to providing its shareholders with information about its financial condition and results of operations in accordance with U.S. securities laws. It is Anika's policy to provide full, fair, accurate, timely and understandable disclosure in reports and documents filed with, or submitted to, the SEC and in other public communications.

Anika's senior management is primarily responsible for monitoring Anika's public disclosures. Representatives who are responsible for these public filings and disclosures must use reasonable judgment and perform their responsibilities honestly, ethically and objectively in order to ensure that this disclosure policy is fulfilled. All Representatives must comply with Anika's *Communication Policy*, which is available on Anika's website.

N. No Discrimination

Anika is committed to a diverse, equitable and inclusive workplace where all employees, regardless of their gender, race, ethnicity, national origin, age, sexual orientation or identity, education or disability are valued, respected and supported. No Representative shall discriminate based on these characteristics. Anika's *Diversity, Equity and Inclusion Policy* is available on Anika's website.

III. Compliance Procedures

A. Communication of Code

All current Representatives will be provided a copy of the Code. Future Representatives will be supplied a copy of the Code when beginning service at Anika. All Representatives will be expected to review and sign an acknowledgment regarding the Code on a periodic basis. Updates of the Code, when adopted, will be promptly supplied to all Representatives. Representatives can also obtain a copy of the Code by requesting one from the Human Resources Department or by accessing it on Anika's website or internal intranet site.

B. Monitoring Compliance and Disciplinary Action

Anika'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, the Audit Committee of the Board (the "Audit Committee"), shall take reasonable steps to (i) monitor compliance with the Code, (ii) investigate any reported violations of the Code, and (iii) when appropriate, impose and enforce appropriate disciplinary measures for violations of the Code.

Disciplinary measures for violations of the Code will be determined in Anika'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.

Anika's management will report to the Board or a committee of the Board on these compliance efforts including, without limitation and when appropriate, violations of the Code and the actions taken with respect to violations.

C. Communication Channels

Be Proactive. Every Representative is encouraged to act proactively by asking questions, seeking guidance and reporting suspected violations of the Code and other Anika policies and procedures, as well as any violation or suspected violation of law, rule or regulation resulting from the conduct of Anika's business or occurring on Anika's property. **If a Representative believes that actions have taken place, may be taking place, or may be about to take place that violate or would violate the Code or any law, rule or regulation applicable to Anika, he or she is obligated (subject to the protections set forth in Anika's Whistleblower Policy) to bring the matter to the attention of Anika, as set forth in Anika's Whistleblower Policy, which is available on Anika's website.** You can report suspected violations anonymously via Anika's whistleblower hotline (833-976-2045) or online reporting system (<https://www.whistleblowerservices.com/ANIK>). You can also report potential violations of the Code directly to the Code Compliance Officer.

Seeking Guidance. The best starting point for employees and officers seeking advice on ethics-related issues or wishing to report potential violations of the Code will usually be their supervisor. However, if the conduct in question involves a 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 a representative of the Human Resources Department or the Code Compliance Officer.

Reporting Accounting and Similar Concerns. Concerns or questions regarding potential violations of the Code, Anika policies or procedures, or laws, rules or regulations relating to accounting, internal accounting controls, or auditing or securities law matters will be directed to 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. Employees and officers can also communicate directly with the Code Compliance Officer regarding such matters.

Cooperation. Representatives are expected to cooperate with Anika in any investigation of a potential violation of the Code, any other Company policy or procedure, or any law, rule or regulation.

Misuse of Reporting Channels. Representatives 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 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 by contacting the Board through its Chair or the Audit Committee.

D. Anonymity

Anika prefers that officers and employees, when reporting suspected violations of the Code, identify themselves to facilitate Anika's ability to take steps to address the suspected

violation, including conducting an investigation. However, Anika also recognizes that some people may feel more comfortable reporting a suspected violation anonymously.

An employee or officer who wishes to remain anonymous may do so, and Anika will use reasonable efforts to protect confidentiality. If a report is made anonymously, however, Anika 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 Anika to evaluate the allegation and, if it deems appropriate, conduct an investigation.

E. No Retaliation

Anika forbids any retaliation against an officer or employee who, acting in good faith on the basis of a reasonable belief, reports suspected misconduct. Specifically, Representatives will not discharge, demote, suspend, threaten, harass or in any other manner discriminate or retaliate against, such an employee because he or she reports any such violation, unless it is determined that the report was made with knowledge that it was false. Anyone who participates in any such retaliatory conduct is subject to disciplinary action, up to and including termination.

IV. Waivers and Amendments

No waiver of any provisions of the Code for the benefit of a director or an executive officer (which includes, without limitation, Anika'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 Anika's securityholders in accordance with all applicable U.S. securities laws and NASDAQ rules and regulations.

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

All amendments to the Code must be approved by the Board and, if required, must be promptly disclosed to Anika's securityholders in accordance with U.S. securities laws and NASDAQ rules and regulations.

ADOPTED: August 30, 2016

LAST UPDATED: December 3, 2024