

## MORPHIC HOLDING, INC.

### WHISTLEBLOWER AND COMPLAINT POLICY

As adopted June 10, 2019

As Amended December 1, 2023

#### I. PURPOSE

Morphic Holding, Inc. (the “*Company*”) is committed to promoting high standards of ethical business conduct and compliance with applicable laws, rules and regulations. As part of this commitment, the Company has adopted this Whistleblower and Complaint Policy (this “*Policy*”). Covered Persons are encouraged to use the guidance provided by this Policy to report all known and suspected improper activities. This Policy applies to the Company’s employees, officers and members of its Board of Directors (“*Board*”), as well as any contractors or consultants that are contractually obligated to comply with this policy (collectively, “*Covered Persons*”). Any attempts to abuse this Policy for personal gain or frivolous reports will be subject to discipline. This Policy is designed to provide Covered Persons with a confidential or anonymous method for reporting any improper activities that are reasonably construed as likely acts of misconduct.

Covered Persons should understand, however, that nothing in this Policy (nor any other Company policy or agreement) limits, impedes, or restricts their 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*”). This Policy also does not limit a Covered Person’s 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. Nothing in this Policy limits a Covered Person’s right to seek and/or receive an award for information provided to any Government Agencies or prohibits employees from providing truthful information in response to a subpoena or other legal process.

#### II. REPORTING VIOLATIONS

Covered Persons should report known and suspected violations of (a) laws, governmental rules and regulations, (b) internal accounting controls or accounting and auditing practices and policies or (c) any Company policies, to their supervisors and managers. This includes complaints or reports received from persons outside the Company and complaints regarding third parties who provide services to the Company. Supervisors and managers shall promptly consider the information submitted to them and take appropriate action in accordance with the law, governmental rules and regulations and otherwise consistent with good business practice. They shall also provide any such information to the Company’s Compliance Officer (the “*Compliance Officer*”), who shall then provide it to the Chairperson of the Audit Committee of the Board (the “*Chair*”).

If a Covered Person is not comfortable discussing the suspected violation with any of their direct supervisors or managers, the Covered Person may report the suspected violation confidentially and anonymously to the Compliance Officer and Chair by the following means:

- By calling the Company’s compliance hotline: From within the United States and Canada, toll-free at 855-774-1066; or

- By a secure web form at <https://www.whistleblowerservices.com/MORF/>. This secure form provides an option for anonymous messages.
- A Covered Person may send a letter addressed to the Company's corporate headquarters marked "Attention: Audit Committee."
- Note: If you wish to remain anonymous, please take the appropriate steps to ensure your anonymity is maintained

If a Covered Person reports using the above procedures, their report will automatically be directed to the Compliance Officer and Chair.

A Covered Person reporting a suspected violation is encouraged to provide as much detail as possible regarding the subject matter of the complaint or concern because the ability to investigate will be largely dependent on the quality and specificity of such information. The Audit Committee will be responsible for reviewing, or overseeing the review, of any report of a suspected violation from any source. The Chair and the Audit Committee will take whatever steps they deem necessary to respond to a report, which may include referring the matter to the Compliance Officer for investigation or for tracking and reporting purposes. Human resources complaints that do not involve accounting, internal accounting controls and auditing matters or similar violations of federal or state laws (including securities laws) or any related legal or compliance violation, may be reported to the Company's human resources team (e.g. for an investigation of an allegation of discrimination or harassment).

The Company has designated the Company's General Counsel as its Compliance Officer. In the event of the General Counsel's unavailability, the Company's Chief Executive Officer, or the Company's President, in the Chief Executive Officer's unavailability, shall be authorized to serve as the Compliance Officer in the interim.

### **III. STATEMENT OF NON-RETALIATION**

The Company will not tolerate any retaliation against someone who reports actual or suspected violations in good faith. It is against Company policy, and in some cases and some countries a crime, for anyone to retaliate against any person who provides truthful information to a law enforcement official concerning such person's reasonable good faith belief that a possible violation of any federal, state or foreign law has occurred. 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. Moreover, the Company will not permit any form of intimidation or retaliation by any employee, contractor, subcontractor or agent of the Company against any Covered Person because of any lawful act done by the Covered Person to:

- provide information, cause information to be provided or otherwise assist in an investigation regarding any conduct which the employee reasonably believes constitutes a violation of laws, rules, regulations or any Company policies; or
- file, cause to be filed, testify, participate in or otherwise assist in a proceeding filed or to be filed relating to a violation of any law, rule or regulation.

The prohibited forms of intimidation or retaliation include, but are not limited to, discharge, demotion, suspension, threats, harassment or any other manner of discrimination with respect to an employee's terms or conditions of employment based on lawful actions of such employee with respect to a

good faith report or cooperation or assistance with an investigation conducted by the Company. Any employee who engages in retaliatory conduct will be disciplined, up to and including termination.

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.

#### **IV. STATEMENT OF CONFIDENTIALITY**

In cases in which an employee reports a suspected violation in good faith and is not engaged in the questionable conduct, the Company will attempt to keep its discussions and actions confidential to the greatest extent possible and in compliance with applicable laws and regulations governing employee privacy. All reports and records associated with complaints or reports made under this Policy are considered Company confidential information and access will be restricted to members of the Board of Directors, the Company's legal counsel and others involved in investigating a complaint or report under this Policy. Access to reports and records may be granted to other parties at the discretion of the Audit Committee.

#### **V. INVESTIGATION AND RECORD KEEPING**

Covered Persons should not independently conduct their own investigation but instead should make their complaint or report to their supervisor or manager, or by following the procedures in this Policy. The Audit Committee will review all complaints and reports of a suspected violation and will coordinate the investigation and resolution of all such complaints and reports to ensure that corrective action, as necessary and appropriate, is taken. 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.

The Compliance Officer (or his or her designee(s)) will maintain a log of all complaints and reports, tracking their receipt, investigation and resolution. The Company will preserve records of complaints and reports made under this Policy and associated log(s) for a period of time to be determined by the Compliance Officer. After the established retention period, the records and associated log(s) may be disposed of in accordance with Company policy.

#### **VI. REPORTING TO THE AUDIT COMMITTEE**

At each regularly scheduled meeting of the Audit Committee, the Compliance Officer will report to the Audit Committee on the nature of any reports of suspected violations received by the Compliance Officer since the previous meeting of the Audit Committee. If the Compliance Officer determines that reporting prior to the next scheduled Audit Committee meeting is necessary or appropriate, the Compliance Officer shall contact the Chair, or such other person designated by the Audit Committee, to decide whether an earlier evaluation is warranted.

#### **VII. POLICY ADMINISTRATION**

The Audit Committee is responsible for reviewing this Policy and confirming that the procedures contained in or required by this Policy are in place. It may request reports from Company executives about the implementation of this Policy and take any other steps in connection with that implementation as it deems

necessary. The Audit Committee may amend this Policy and procedures associated with this Policy at its discretion.