SANA BIOTECHNOLOGY, INC.
CODE OF BUSINESS CONDUCT AND ETHICS

Adopted Effective: August 5, 2026

Introduction

In accordance with the requirements of the U.S. Securities and Exchange Commission (the "***SEC***") and the National Association of Securities Dealers Automated Quotations Stock Market ("***Nasdaq***") Listing Standards, the Board of Directors (the "***Board***") of Sana Biotechnology, Inc. (the "***Company***," "***we***," or "***our***") has adopted this Code of Business Conduct and Ethics (this "***Code***") to encourage:

- Honest and ethical conduct, including fair dealing and the ethical handling of actual or apparent conflicts of interest;
- Full, fair, accurate, timely and understandable disclosure;
- Compliance with applicable governmental laws, rules and regulations, including all applicable U.S. healthcare fraud and abuse laws, Food and Drug Administration ("***FDA***") rules and regulations, U.S. privacy and cybersecurity laws and regulations, and applicable anti-bribery and anti-corruption laws;
- Prompt internal reporting of any violations of law or this Code;
- Accountability for adherence to this Code, including fair process by which to determine violations;
- Consistent enforcement of this Code, including clear and objective standards for compliance;
- Protection for persons reporting any such questionable behavior;
- The protection of the Company's legitimate business interests, including its assets and corporate opportunities; and
- Confidentiality of information entrusted to directors, officers and employees by the Company and its customers.

All directors, officers and employees (each, a "***Covered Party***" and, collectively, "***Covered Parties***") of the Company and all of its subsidiaries and controlled affiliates are expected to be familiar with this Code and to adhere to the principles and procedures set forth below.

Seeking Help and Information

The Company promotes ethical behavior at all times. This Code is not intended to be a comprehensive rulebook and cannot address every situation that you may face. If you feel uncomfortable about a situation or have any doubts about the best course of action or whether it is consistent with the Company's ethical standards, seek help. We encourage you to contact your manager for help. If your manager cannot answer your question or if you do not feel comfortable contacting your manager, contact the Company's General Counsel (or the Chief Financial Officer in the absence of a General Counsel, or, in their absence from the office, the Chief Executive Officer), or such other person as the Board may designate from time to time (the "***Compliance***

Officer"). You may also ask questions or seek guidance through the Ethics Hotline described below.

Reporting Violations of this Code

All Covered Parties have a duty to report any known or suspected violation of this Code, including violations of the laws, rules, regulations or policies that apply to the Company. If you know of or believe there has been a violation of this Code, immediately report the conduct to your manager or the Compliance Officer. The Compliance Officer will work with you and your manager or other appropriate persons to investigate your concern. If you do not feel comfortable reporting the conduct to your manager or you do not get a satisfactory response, you may contact the Compliance Officer directly.

You may also report known or suspected violations of this Code on the Ethics Hotline that is available 24 hours a day, 7 days a week at:

Website: www.lighthouse-services.com/sana
Phone Number: 866-222-0584

Any reports submitted via the Ethics Hotline will be reviewed by the Compliance Officer and subsequently reported to the Audit Committee of the Board (the "***Audit Committee***"). You may remain anonymous and will not be required to reveal your identity in calls to the Ethics Hotline, although providing your identity may assist the Company in investigating your concern. All reports of known or suspected violations of the law or this Code will be handled sensitively and with discretion. The Audit Committee or other appropriate officer or body shall investigate and determine, or shall designate appropriate persons to investigate and determine, the legitimacy of such reports.

It is Company policy that any Covered Party who violates this Code, or who directs or approves a violation of this Code, may be subject to appropriate corrective action, which may include, but is not limited to, reprimand or termination of service to the Company, as appropriate. The Audit Committee or other appropriate officer or body will determine the appropriate corrective action based upon the facts and circumstances of each particular situation. Covered Parties who violate the law or this Code may expose themselves to substantial civil damages, criminal fines and prison terms. The Company may also face substantial fines and penalties and may incur damage to its reputation and standing in the community.

Policy Against Retaliation

The Company prohibits retaliation against a Covered Party who, in good faith, seeks help or reports known or suspected violations. Any reprisal or retaliation against a Covered Party because the Covered Party, in good faith, sought help or filed a report will be subject to corrective action, including potential termination of service to the Company.

Waivers of this Code

Any waiver of this Code for our directors, executive officers or other principal financial officer or principal accounting officer (or in the absence of a principal accounting officer, our

controller or person performing similar functions) may be made only by the Board. Before any such individual, or an immediate family member[1] of any such individual, engages in any activity that would be otherwise prohibited by this Code, they must obtain a written waiver from the disinterested directors of the Board. Such waiver will be disclosed to the public as required by law or the rules of Nasdaq, along with the reasons for granting the waiver.

Waivers of this Code for other Covered Parties may be made only by the Company's Chief Executive Officer or Chief Financial Officer. Before any such Covered Party, or an immediate family member of any such Covered Party, engages in any activity that would be otherwise prohibited by this Code, they must obtain a written waiver from the Chief Executive Officer or Chief Financial Officer. Such waiver will be reported to our Audit Committee.

I. Conflicts of Interest

A conflict of interest occurs when the private interests of a Covered Party interfere, or appear to interfere, with the interests of the Company as a whole. For example, a conflict of interest can arise when a Covered Party takes actions or has personal interests that may make it difficult to perform their Company duties objectively and effectively. A conflict of interest may also arise when a Covered Party, or their immediate family member, receives improper personal benefits as a result of such Covered Party's position at the Company.

Conflicts of interest can also occur indirectly. For example, a conflict of interest may arise when a Covered Party is also an executive officer, a major stockholder or has a material interest in a company or organization doing business with the Company.

Each Covered Party has an obligation to conduct the Company's business in an honest and ethical manner, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships. Any situation that involves, or may reasonably be expected to involve, a conflict of interest with the Company, must be disclosed promptly to the Company's General Counsel or the Audit Committee and, in the case of a director of the Company, must be disclosed promptly to the Chairman of the Nominating and Corporate Governance Committee of the Board and the Chairman of the Audit Committee in accordance with the Company's Conflicts of Interest Policies and Procedures For Directors. Factors that may be considered in evaluating a potential conflict of interest are, among others:

- whether it may interfere with the Covered Party's job performance or responsibilities;
- whether the Covered Party has access to confidential information;
- whether it may interfere with the job performance, responsibilities or morale of others within the Company;
- any potential adverse or beneficial impact on the Company's business;
- any potential adverse or beneficial impact on the Company's relationships with its third-party collaborators, suppliers or other service providers;
- whether it would enhance or support a competitor's position relative to the Company;

[1] "Immediate family member" means a person's child, stepchild, parent, stepparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law or sister-in-law, or any person (other than a tenant or employee) sharing the person's household.

- the extent to which it would result in financial or other benefit (direct or indirect) to the Covered Party;
- the extent to which it would result in financial or other benefit (direct or indirect) to a third-party collaborator, supplier or other service provider of the Company; and
- the extent to which it would appear improper to an outside observer.

This Code does not attempt to describe all possible conflicts of interest that could develop. Other common scenarios that may, depending on the facts and circumstances, create a conflict of interest from which Covered Parties must refrain are set out below:

- Covered Parties may not engage in any conduct or activities that are inconsistent with the Company's best interests or that disrupt or impair the Company's relationship with any person or entity with which the Company has or proposes to enter into a business or contractual relationship.
- Covered Parties may not accept compensation, in any form, for services performed for the Company from any source other than the Company.
- No Covered Party may take up any director, management or other employment position with, or have any material interest in, any firm or company that is in competition with the Company.

II. Disclosures

The information in the Company's public communications, including in all reports and documents filed with or submitted to the SEC, must be full, fair, accurate, timely and understandable.

To ensure the Company meets this standard, all Covered Parties (to the extent they are involved in the Company's disclosure process) are required to maintain familiarity with the disclosure requirements, processes and procedures applicable to the Company commensurate with their duties. Covered Parties are prohibited from knowingly misrepresenting, omitting or causing others to misrepresent or omit material facts about the Company to others, including the Company's independent auditors, governmental regulators and self-regulatory organizations.

III. Compliance with Laws, Rules and Regulations

The Company is obligated to comply with all applicable laws, rules and regulations. As a biopharmaceutical manufacturer, U.S. healthcare fraud and abuse laws and FDA rules and regulations may apply to the Company's activities. Violations of the applicable laws, rules and regulations may result in severe consequences for the Company and Company personnel, including potential criminal, civil, and administrative penalties, prison sentences, debarment, or exclusion from participation in Federal health care programs, including Medicare and Medicaid. The Company is also subject to anti-corruption, antitrust, and privacy and cybersecurity laws and regulations (including with regard to health and genetic information, among other topics), violation of which can lead to significant criminal and civil penalties, as well as regulatory investigations, reputational damage, operational or business losses, and diminished standing in the market. It is the personal responsibility of each Covered Party to adhere to the standards and restrictions imposed by these laws, rules and regulations in the performance of their duties for the Company.

The Chief Executive Officer, Chief Financial Officer, Chief Legal Officer, principal accounting officer or controller (or persons performing similar functions), and other officers of the Company are also expected to promote compliance by all employees with this Code and to abide by Company standards, policies and procedures.

IV. Insider Trading

Trading on inside information is a violation of federal securities law. Covered Parties in possession of material non-public information about the Company or companies with whom the Company does business must abstain from trading or advising others to trade in the respective company's securities from the time that they obtain such inside information until adequate public disclosure of the information. Material information is information of such importance that it can be expected to affect the judgment of investors as to whether or not to buy, sell, or hold the securities in question. To use non-public information for personal financial benefit or to "tip" others, including family members, who might make an investment decision based on this information is not only unethical but also illegal. Covered Parties who trade stock based on insider information can be personally liable for damages totaling up to three times the profit made or loss avoided by the respective Covered Party. Covered Parties are expected to familiarize themselves and comply with the Company's policies with respect to insider trading as set forth in the Company's Insider Trading Compliance Policy.

V. Corporate Opportunities

All Covered Parties owe a duty to the Company to advance the legitimate interests of the Company when the opportunity to do so arises. Covered Parties are prohibited from directly or indirectly (a) taking personally for themselves opportunities that are discovered through the use of Company property, information, or positions; (b) using Company property, information, or positions for personal gain; or (c) competing with the Company for business opportunities; provided, however, if the disinterested directors of the Board determine that the Company will not pursue an opportunity that relates to the Company's business, a Covered Party may do so, after notifying the disinterested directors of the Board of such Covered Party's intended actions in order to avoid any appearance of conflict of interest.

VI. Confidentiality and Use of IT Systems

In carrying out the Company's business, Covered Parties may learn confidential or proprietary information about the Company, its customers, distributors, suppliers, service providers, collaborators, joint venture partners or other third parties involved in the Company's operations. Confidential or proprietary information includes all non-public information relating to the Company, or other entities, that would be harmful to the relevant entity or useful or helpful to competitors if disclosed, including financial results or prospects, information provided by a third party, trade secrets, new product or marketing plans, research and development ideas, manufacturing processes, potential acquisitions or investments, or information of use to our competitors or harmful to us or our customers if disclosed.

Covered Parties must maintain the confidentiality of all information so entrusted to them, except when disclosure is authorized or legally mandated. Covered Parties must safeguard

confidential information by keeping it secure using reasonable administrative, technical and physical safeguards, including, at a minimum, those implemented or required by the Company, limiting access to those who have a need to know in order to do their job, and avoiding discussion of confidential information in public areas such as planes, elevators, and restaurants, including on mobile phones, in each case, as further described in the Company's Information Technology Acceptable Use Policy and other information technology- and information security-related policies and procedures (collectively, "***IT Policies***"). This prohibition includes, but is not limited to, inquiries made by the press, analysts, investors or others. Covered Parties also may not use such information for personal gain. These confidentiality obligations continue even after employment or another service relationship with the Company ends.

Company information technology systems and equipment, including the Internet and email, are regularly monitored for information security and compliance purposes. Covered Parties are responsible for understanding the requirements of and complying with the IT Policies and should review such IT Policies for additional information with respect to the requirements in this Code. Covered Parties should report any information security concerns immediately to the IT Service Desk.

VII. Ethical Dealing

Each Covered Party should endeavor to deal ethically with fellow personnel and with the Company's customers, service providers, suppliers, and competitors. No Covered Party should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any unfair dealing practice. Inappropriate use of proprietary information, misusing trade secret information that was obtained without the owner's consent, or inducing such disclosures by past or present employees of other companies is also prohibited.

VIII. Protection and Proper Use of Company Assets

All Covered Parties should protect the Company's assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on the Company's profitability. All Company assets should be used only for legitimate business purposes. The obligation of Covered Parties to protect the Company's assets includes its proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks, and copyrights, as well as business, marketing and service plans, engineering and manufacturing ideas, designs, databases, records, salary information, and any unpublished financial data and reports.

IX. Accuracy of Business Records

All financial books, records and accounts must accurately reflect transactions and events, and conform both to generally accepted accounting principles and to the Company's system of internal controls. No entry may be made that intentionally hides or disguises the true nature of any transaction. Covered Parties should therefore attempt to be as clear, complete, truthful and accurate as possible when recording any information. Covered Parties are expected to familiarize themselves and comply with the Company's policies regarding books and records as described in the Company's Global Anti-Corruption Policy.

X. Corporate Loans or Guarantees

Federal law prohibits the Company from making loans and guarantees of obligations to directors, executive officers, and members of their immediate families.

XI. Gifts and Favors

The exchange of business courtesies is a normal and accepted business practice throughout the world and, when conducted appropriately, can create goodwill and enhance business relationships. Gifts and entertainment should further the business interests of the Company and should not be susceptible to being construed as potentially influencing business judgment or creating an obligation. Providing gifts, entertainment, meals or other items of value may present significant risk under applicable laws in the United States and elsewhere, including the U.S. Foreign Corrupt Practices Act, the federal Anti-Kickback Statute, state anti-kickback laws, and other anti-bribery and anti-corruption laws. To promote compliance with applicable anti-bribery and anti-corruption laws, Covered Parties are expected to familiarize themselves with and comply with the policies and guidelines set forth in the Company's Global Anti-Corruption Policy.

XII. Interactions with Healthcare Professionals

The Company is committed to interactions with healthcare professionals that are legitimate, necessary, and appropriate. These interactions are professional in nature and are intended to facilitate the exchange of medical or scientific information that will benefit patient care. The Company's relationships with healthcare professionals may include consulting activities, research, including the conduct of clinical trials, speaking engagements, grants, and supporting continuing education, among others. The Company pays only reasonable fees for these arrangements, based on the fair market value of the services provided.

Healthcare professionals are independent decisionmakers. Nothing should be provided or offered to healthcare professionals that would interfere with the independence of any such professional's prescribing or ordering practices. To avoid any inappropriate influence over healthcare professionals' clinical decision-making and to avoid the appearance of impropriety, the Company does not provide or permit any Covered Person to provide any gift, entertainment, or other items of value to healthcare professionals. This prohibition applies regardless of a) the value of the items; b) whether the Company engages the healthcare professional as a speaker or consultant; or c) whether the entertainment is secondary to an educational purpose. Occasional, modest meals are permitted as long as they are offered in the appropriate circumstances and venues.

Additionally, the Company is committed to communicating in a truthful and non-misleading manner with healthcare professionals, and promoting products only for uses approved or authorized by the appropriate regulatory agencies. All such communications must be honest, accurate, not misleading, and in compliance with applicable law.

XIII. Antitrust Laws and Competition

The purpose of antitrust laws is to preserve fair and open competition and a free market economy, which are goals that the Company fully supports. Covered Parties must not directly or

indirectly enter into any formal or informal agreement with competitors that fixes or controls prices, divides or allocates markets, limits the production or sale of products, boycotts certain suppliers or customers, eliminates competition or otherwise unreasonably restrains trade.

XIV. Research and Development Activities

The Company conducts and sponsors research that aims to advance innovation and valuable scientific inquiry and works with leading academic laboratories and industry partners on research and development related to our technologies. Covered Parties involved in the Company's research and development activities will fulfill transparency requirements in the conduct of all clinical trials and will ensure that applicable regulations and standards regarding research, including good clinical and laboratory practices, are followed when conducting research (including as required under privacy and cybersecurity laws and regulations).

XV. Political Contributions

Covered Parties may participate in the political process as individuals on their own time. However, Covered Parties must make every effort to ensure that they do not create the impression that they speak or act on behalf of the Company with respect to political matters. Company contributions to any political candidate or party or to any other organization that might use the contributions for a political candidate or party are prohibited. A Covered Party may not receive any reimbursement from corporate funds for a personal political contribution.

XVI. Grants, Donations, and Charitable Contributions

The Company is committed to making a positive contribution to science, medicine, and patient communities through grants, charitable contributions, sponsorships, and other initiatives. Covered Parties will ensure that grants, product and financial donations, and charitable activities are focused on the advancement of science and medicine or for the benefit of patients, caregivers and their communities. When the Company offers donations or charitable contributions, there is no expectation of receiving specific benefits or financial returns in exchange for this support. The Company will only contribute to reputable, not-for-profit organizations and will ensure that any such contributions are made in a transparent manner. Further, the Company will honor individuals' and organizations' independence, integrity, and privacy, and will not seek to exercise undue influence over their opinions or activities.

XVII. Promotion

The Company is committed to complying with applicable legal and regulatory requirements in order to ensure that the Company's efforts do not inappropriately promote the use of the Company's product candidates or any approved products. Covered Parties are expected to conduct activities for the Company in a manner that does not violate such requirements.

XVIII. Discrimination and Harassment

The Company is an equal opportunity employer and will not tolerate illegal discrimination or harassment. The Company is committed to providing a workplace free of discrimination and harassment based on race, color, religion, age, gender, national origin, ancestry, sexual orientation,

disability, veteran status, or any other basis prohibited by applicable law. Examples include derogatory comments based on a person's protected class and sexual harassment and unwelcome sexual advances. Similarly, offensive or hostile working conditions created by such harassment or unlawful discrimination will not be tolerated.

XIX. Environmental Protection

The Company is committed to managing and operating its assets in a manner that is protective of human health and safety and the environment. It is our policy to comply with both the letter and the spirit of the applicable health, safety and environmental laws and regulations and to attempt to develop a cooperative attitude with government inspection and enforcement officials. Covered Parties are encouraged to report conditions that they perceive to be unsafe, unhealthy or hazardous to the environment.

XX. Personal Conduct and Social Media Policy

Covered Parties should take care when presenting themselves in public settings, as well as online and in web-based forums or networking sites. Each Covered Party is encouraged to conduct themselves in a responsible, respectful, and honest manner at all times, including when using social media.

Covered Parties are prohibited from using or disclosing confidential, proprietary, sensitive or trade secret information of the Company, its partners, vendors, consultants or other third parties with which the Company does business, for personal use, including through social media. Covered Parties should be aware that that even after a social media posting is deleted, certain technology may still make that content available to readers. A Covered Party may not provide any content to Company social media that may be construed as political lobbying or solicitation of contributions, or use Company social media to link to any sites sponsored by or endorsing political candidates or parties, or to discuss political campaigns, political issues or positions on any legislation or law. All communications and activities on social media should be conducted in a manner that is consistent with applicable legal and regulatory requirements and the Company's Social Media Policy.

XXI. No Rights Created

This Code is a statement of certain fundamental principles, policies and procedures that govern Covered Parties in the conduct of the Company's business. It is not intended to and does not create any rights in any employee, customer, client, visitor, supplier, competitor, stockholder or any other person or entity.