

CABALETTA BIO, INC.

Code of Business Conduct and Ethics

1. PURPOSE

- 1.1. The Board of Directors of Cabaletta Bio, Inc. (together with its subsidiaries, the "Company") has adopted this Code of Business Conduct and Ethics (this "Code") to aid the Company's directors, officers, employees, and certain designated agents in making ethical and legal decisions when conducting the Company's business and performing their day-to-day duties.
- 1.2. The Company's Board of Directors (the "Board") or a committee of the Board is responsible for administering the Code. The Board has delegated day-to-day responsibility for administering and interpreting the Code to the Compliance Officer.

The Company expects its directors, officers, employees and designated agents to exercise reasonable judgment when conducting the Company's business. The Company encourages its directors, officers, employees and designated agents to refer to this Code frequently to ensure that they are acting within both the letter and spirit of this Code. The Company also understands that this Code will not provide an answer to every problem you may encounter or address every concern you may have about conducting the Company's business ethically and legally. In these situations, or if you otherwise have questions or concerns about this Code, the Company encourages each officer and employee to speak with his or her supervisor (if applicable) or, if you are uncomfortable doing that, with the Compliance Officer.

2. SCOPE

- 2.1. The Company's directors, officers, employees, and designated agents generally have other legal and contractual obligations to the Company. This Code is not intended to reduce or limit the other obligations you may have to the Company. Instead, this Code should be viewed as imposing the minimum standards the Company expects from its directors, officers, and employees in the conduct of the Company's business.

3. RESPONSIBILITIES

Role	Responsibilities
Board of Directors	<ul style="list-style-type: none">Responsible for administering the Code and delegating day-to-day responsibility for administering and interpreting the Code to the Compliance Officer
Compliance Officer	<ul style="list-style-type: none">Responsible for ensuring oversight and compliance with the Code
Cabaletta Bio's directors, officers, employees, and designated agents	<ul style="list-style-type: none">Responsible for following the policies outlined in the Code

4. DEFINITIONS

- 4.1. N/A

5. MATERIALS (Includes applicable equipment)

5.1. N/A

6. HEALTH & SAFETY (Optional)

6.1. N/A

7. POLICY

7.1. Compliance with Laws, Rules, and Regulations

7.1.1. The Company requires that all employees, officers, directors, and certain designated agents comply with all laws, rules, and regulations applicable to the Company 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.

7.1.2. If you become aware of the violation of any law, rule, or regulation by the Company, whether by its officers, employees, directors, or any third-party doing business on behalf of the Company, it is your responsibility to promptly report the matter to your supervisor or to the Compliance Officer. While it is the Company's desire to address matters internally, nothing in this Code should discourage you from reporting any illegal activity, including any violation of the securities laws, antitrust laws, environmental laws, or any other federal, state, or foreign law, rule, or regulation, to the appropriate regulatory authority. Employees, officers, directors, and designated agents shall not discharge, demote, suspend, threaten, harass or in any other manner discriminate or retaliate against an employee because they report any such violation unless it is determined that the report was made with knowledge that it was false. This Code should not be construed to prohibit you from testifying, participating, or otherwise assisting in any state or federal administrative, judicial, or legislative proceeding or investigation.

7.2. Conflicts of Interest

7.2.1. The Company recognizes and respects the right of its directors, officers, employees, and designated agents 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 the Company or their ability to act in the Company's best interests. In most, if not all, cases, this will mean that our directors, officers, and employees must avoid situations that present a potential or actual conflict between their personal interests and the Company's interests.

7.2.2. A "conflict of interest" occurs when a director's, officer's, employee's, or designated agent's personal interest interferes with the Company's interests. Conflicts of interest can arise in many situations. For example, conflicts of interest can arise when a director, officer, employee, or a designated agent takes action or has an outside interest, responsibility, or obligation that can make it difficult for them to perform the duties of their position objectively or effectively in the Company's best interests. Conflicts of interest can also occur when a director, officer, employee, or designated agent or their immediate family member receives some personal benefit (whether improper or not) as a result of the director's, officer's, employees, or designated agent's

position with the Company. Each individual's situation is different, and in evaluating their situation, a director, officer, or employee will have to consider many factors.

- 7.2.3. 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 Compliance Officer, who may notify the Board or a committee of the Board as they deem appropriate. Actual or potential conflicts of interest involving the Compliance Officer should be disclosed directly to the Chief Executive Officer. Actual or potential conflicts of interest involving a director or executive officer other than the Compliance Officer should be disclosed directly to the Compliance Officer.

7.3. Insider Trading

- 7.3.1. Employees, officers, and directors who have material non-public information about the Company or other companies, including our suppliers and customers, as a result of their relationship with the Company are prohibited by law and Company policy from trading in securities of the Company 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, the Company has adopted an Insider Trading Policy, which is distributed to employees and available from the General Counsel.
- 7.3.2. If you are uncertain about the constraints on your purchase or sale of any Company securities or the securities of any other company that you are familiar with by virtue of your relationship with the Company, you should consult with the General Counsel before making any such purchase or sale.

7.4. Confidentiality

- 7.4.1. Employees, officers, directors, and designated agents must maintain the confidentiality of confidential information entrusted to them by the Company or other companies, including our suppliers and customers, except when disclosure is authorized by a supervisor or legally mandated. Unauthorized disclosure of any confidential information is prohibited. Additionally, employees should take appropriate precautions to ensure that confidential or sensitive business information, whether it is proprietary to the Company or another company, is not communicated within the Company except to employees who need to know such information to perform their responsibilities for the Company.
- 7.4.2. Third parties may ask you for information concerning the Company. Subject to the exceptions noted in the preceding paragraph, employees, officers, and directors (other than the Company's authorized spokespersons) must not discuss internal Company matters with, or disseminate internal Company information to, anyone outside the Company, except as required in the performance of their Company duties and, if appropriate, after a confidentiality agreement is in place. This prohibition applies particularly to inquiries concerning the Company 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 the Company must be made only by the Company'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 the Company's authorized spokespersons. The Company's policies with respect to public disclosure of internal matters are described more fully in the Company's Corporate Communications Policies and Procedures Policy, which is available in the Company's Quality Management System.

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

7.5. Honest and Ethical Conduct and Fair Dealing

- 7.5.1. Employees, officers, directors, and designated agents should endeavor to deal honestly, ethically, and fairly with the Company's suppliers, customers, competitors, and employees. Statements regarding the Company's products and services must not be untrue, misleading, deceptive, or fraudulent. You must not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice.

7.6. Protection and Proper Use of Corporate Assets

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

7.7. Corporate Opportunities

- 7.7.1. Directors, officers, employees, and designated agents owe a duty to the Company to advance its legitimate business interests when the opportunity to do so arises. Each employee, officer, and director are prohibited from diverting to themselves or to others any opportunities that are discovered through the use of the Company's property or information or as a result of their position with the Company unless that opportunity has first been presented to, and rejected by, the Company.
- 7.7.2. Directors, officers, employees, and designated agents are prohibited from using the Company's property or information or their position for improper personal gain; or competing with the Company.

7.8. Political Contributions/Gifts

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

7.9. Bribes, Kickbacks, and Other Improper Payments

- 7.9.1. The Company does not permit or condone bribes, kickbacks, or other improper payments, transfers, or receipts. No director, officer, or employee should offer, give, solicit, or receive any money or other item of value for the purpose of obtaining, retaining, directing business, or bestowing or receiving any kind of favored treatment.

7.10. International Trade Controls

- 7.10.1. 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. The Company'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 the Company.

7.11. Accuracy of Records

- 7.11.1. Employees, officers, directors, and designated agents must honestly and accurately report all business transactions. You are responsible for the accuracy of your records and reports. Accurate information is essential to the Company's ability to meet legal and regulatory obligations.
- 7.11.2. 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. The financial statements of the Company shall conform to generally accepted accounting rules and the Company'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 the Company's books or records for any reason, and no disbursement of corporate funds or other corporate property shall be made without adequate supporting documentation.

7.12. Quality of Public Disclosures

- 7.12.1. It is the Company's policy to provide complete, fair, accurate, timely, and understandable disclosure in reports and documents filed with, or submitted to, the Securities and Exchange Commission and in other public communications.

7.13. Communication of Code

- 7.13.1. All current directors, officers, employees, and certain designated agents are being supplied with a copy of the Code. Future directors, officers, and employees will be provided a copy of the Code when beginning service at the Company. All directors, officers, and employees will be expected to review and provide acknowledgment regarding the Code on a periodic basis. Updates of the Code, when adopted, will be promptly supplied to directors, officers, and employees. Directors, officers, and employees also can obtain a copy of the Code by requesting one from the human resources department or by accessing the Company's website at www.cabalettabio.com.

7.14. Monitoring Compliance and Disciplinary Action

- 7.14.1. The Company'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, shall take reasonable steps to (i) monitor compliance with the Code, and (ii) when appropriate, impose and enforce appropriate disciplinary measures for violations of the Code.
- 7.14.2. Disciplinary measures for violations of the Code will be determined in the Company'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.
- 7.14.3. The Company's management shall periodically report to the Board or a committee of the Board on these compliance efforts, including, without limitation, alleged violations of the Code and the actions taken with respect to violations.

7.15. Communication Channels

- 7.15.1. *Be Proactive.* Every employee, officer, director, and designated agent is expected to act proactively by asking questions, seeking guidance, and reporting suspected violations of the Code and other policies and procedures of the Company, as well as any violation or suspected violation of law, rule or regulation resulting from the conduct of the Company's business or occurring on the Company's property. **If any employee, officer, director, or designated agent believes that actions have taken place, may be taking place, or maybe about to take place that violates or would violate the Code or any law, rule, or regulation applicable to the Company, they are obligated to bring the matter to the attention of the Company.** Our whistleblower hotline number is **800-916-7037 (company identifier: 2222)**. An online reporting option is https://irdirect.net/CABA/whistleblower_iframe/.
- 7.15.2. *Seeking Guidance.* The best starting point for an officer, employee, or designated agent 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 an officer's or employee's supervisor, if the officer or employee has reported the behavior in question to the supervisor and does not believe that the supervisor has dealt with it properly, or if the officer, employee, or designated agent does not feel comfortable discussing the matter with the supervisor, then they should raise the matter with the Compliance Officer.
- 7.15.3. *Communication Alternatives.* Any officer, employee, or designated agent may communicate with the Compliance Officer or report potential violations of the Code by any of the following methods:
- 7.15.4. By e-mail to compliance@cabalettabio.com (anonymity cannot be maintained).
- 7.15.5. In writing (which can be done anonymously as set forth below under "Anonymity"), addressed to the Compliance Officer, by mail to c/o Cabaletta Bio, Inc., 2929 Arch Street, Suite 600, Philadelphia, PA 19104.
- 7.15.6. Online at https://irdirect.net/CABA/whistleblower_iframe/ (which may be done anonymously as set forth below under "Anonymity"); or
- 7.15.7. By phoning and leaving a voicemail. The voicemail can be reached at **800-916-7037 (company identifier: 2222)**, and messages can be left anonymously as set forth below

under "Anonymity" or by calling 267.759-3100 and choosing option 3 (anonymity cannot be maintained).

- 7.15.8. *Reporting Accounting and Similar Concerns.* Concerns or questions regarding potential violations of the Code, a Company policy or procedure or laws, rules or regulations relating to accounting, internal accounting controls, or auditing or securities law matters will be directed to the Audit Committee of the Board (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. Officers and employees can also communicate directly with the Audit Committee or its designee regarding such matters by the following methods (which can be done anonymously as set forth below under "Anonymity"):
- 7.15.9. *Cooperation.* Employees, officers, and designated agents are expected to cooperate with the Company in any investigation of a potential violation of the Code, any other Company policy or procedure, or any law, rule, or regulation.
- 7.15.10. *Misuse of Reporting Channels.* Employees, officers, and designated agents must not use these reporting channels in bad faith or in a false or frivolous manner or report grievances that do not involve the Code or other ethics-related issues.
- 7.15.11. *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.

7.16. Anonymity

- 7.16.1. The Company prefers that officers and employees, when reporting suspected violations of the Code, identify themselves to facilitate the Company's ability to take steps to address the alleged violation, including conducting an investigation. However, the Company also recognizes that some people may feel more comfortable reporting a suspected violation anonymously.
- 7.16.2. An officer, employee, or designated agent who wishes to remain anonymous may do so, and the Company will use reasonable efforts to protect confidentiality. If a report is made anonymously, however, the Company 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 the Company to evaluate the allegation and, if it deems appropriate, conduct an investigation.

7.17. No Retaliation

- 7.17.1. The Company forbids any retaliation against any officer or employee who, acting in good faith on the basis of a reasonable belief, reports suspected misconduct. Specifically, the Company will not discharge, demote, suspend, threaten, harass or in any other manner discriminate against such an officer or employee. Anyone who participates in such conduct is subject to disciplinary action, including termination.

7.18. Waivers and Amendments

- 7.18.1. No waiver of any provisions of the Code for the benefit of a director or an executive officer (which includes, without limitation, the Company'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 the Company's security holders in accordance with applicable U.S. securities laws and the rules and regulations of the exchange or system on which the Company's shares are traded or quoted, as the case may be.
- 7.18.2. Any waivers of the Code for other employees may be made by the Compliance Officer, the Board, or, if permitted, the Audit Committee.
- 7.18.3. All amendments to the Code must be approved by the Board and, if required, must be promptly disclosed to the Company's security holders in accordance with United States securities laws and Nasdaq rules and regulation

8. WHISTLEBLOWER PROTECTION

- 8.1 Nothing contained in this Code, any agreement you have entered into with the Company, or any other Company policy limits your ability, with or without notice to the Company, 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 Securities and Exchange Commission (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). The Company will not limit any right you may have to receive an award pursuant to the whistleblower provisions of any applicable law or regulation for providing information to the SEC or any other Government Agency. Any provisions of any agreement between the Company and any current or former employee that is inconsistent with the above language or that may limit or interfere with the ability of any person to receive an award under the whistleblower provisions of applicable law will not be enforced by the Company.

9. REFERENCES

9.1. N/A

10. ASSOCIATED DOCUMENTS

10.1. N/A