

Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name		2 Issuer's employer identification number (EIN)	
Enliven Therapeutics, Inc. (F/K/A Imara Inc.)		81-1523849	
3 Name of contact for additional information	4 Telephone No. of contact	5 Email address of contact	
Investor Relations	720-647-8519	IR@EnlivenTherapeutics.com	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact		7 City, town, or post office, state, and ZIP code of contact	
6200 Lookout Road		Boulder, CO 80301	
8 Date of action		9 Classification and description	
February 23, 2023		Reverse Merger	
10 CUSIP number	11 Serial number(s)	12 Ticker symbol	13 Account number(s)
29337E102		ELVN	

Part II Organizational Action Attach additional statements if needed. See back of form for additional questions.

14 Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action ▶ On February 23, 2023, a wholly-owned subsidiary of Imara Inc. ("Imara") merged with and into Enliven Therapeutics, Inc. ("Old Enliven"), with Old Enliven surviving the merger. As a result, Old Enliven became a wholly-owned subsidiary of Imara. Following the closing of the merger, Imara changed its name to Enliven Therapeutics, Inc. ("New Enliven"). Beginning with the opening of trading on February 24, 2023, New Enliven's common stock traded on the NASDAQ Global Select Market under ticker symbol "ELVN" with a new CUSIP number 29337E102. The transaction was intended to qualify as a reorganization within the meaning of sections 368(a)(1)(A) and 368(a)(2)(E) and/or as a non-taxable exchange under section 351(a).

15 Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis ▶ Immediately after the merger, there were approximately 41.1 million shares of New Enliven common stock outstanding, with prior New Enliven stockholders owning approximately 16% of the outstanding shares of New Enliven on a fully-diluted basis and Old Enliven stockholders owning approximately 84% of the outstanding shares of the combined company on a fully-diluted basis. Each share of capital stock of Old Enliven was exchanged for the right to receive a certain number of shares of common stock of New Enliven, par value of \$0.001 per share.

No fractional shares were issued in connection with this merger. Any stockholder of New Enliven who would otherwise have been entitled to a fractional share received a cash payment instead of such fractional share.

16 Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates ▶ The stockholders' calculated basis in the New Enliven common stock will be based upon (i) their basis in their Old Enliven common stock, (ii) decreased by any cash or other non-stock consideration received and (iii) increased by any gain recognized in the transaction. Where one share of New Enliven stock was received in exchange for more than one share of Old Enliven stock, the basis of the shares of stock surrendered must be allocated to the share of stock received in a manner that minimizes the disparity in the holding period of the surrendered shares of stock whose basis is allocated to any particular share of stock received. See the rules of Treas. Reg. Sec.1.358-2.

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶
Sections 368(a)(1)(A) and (a)(2)(E), 351, 354, 356, 1032, Treas. Reg. Sec. 1.358-2, and Treas. Reg. Sec. 1.358-6

18 Can any resulting loss be recognized? ▶ Any stockholder of New Enliven who received cash in lieu of a fractional share of New Enliven common stock will recognize gain or loss equal to the difference between the amount of cash received and the portion of the stockholder's aggregate adjusted tax basis in the shares of Old Enliven common stock allocable to the fractional share.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶
The transaction occurred during the calendar year ending December 31, 2023.

Sign Here Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.
DocuSigned by:
Signature ▶ Ben Hohl Date ▶ 4/10/2023
C4D00973FA5349E...
Print your name ▶ Ben Hohl Title ▶ Chief Financial Officer

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	Nickolas Zheng	<i>Nickolas Zheng</i>	4/10/2023		P01465726
	Firm's name ▶ Deloitte Tax LLP			Firm's EIN ▶ 86-1065772	
	Firm's address ▶ 200 Berkeley Street Boston, MA 02116			Phone no. 617-437-2000	

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶
Sections 368(a)(1)(E) , 354, 356, 358, and 1032, and Treas. Reg. Sec.1.358-2

18 Can any resulting loss be recognized? ▶ Any Imara shareholder that receives cash in lieu of a fractional share of Imara common stock as a result of the reverse stock split should recognize capital gain or loss in an amount equal to the difference between the amount of cash received and the Imara shareholder's tax basis in the shares of Imara common stock surrendered that is allocated to such fractional share of Imara common stock.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶
The transaction occurred during the calendar year ending December 31, 2023.

Sign Here
Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.
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Signature ▶ Ben Hohl Date ▶ 4/10/2023
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Print your name ▶ Ben Hohl Title ▶ Chief Financial Officer

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	Nickolas Zheng	<u>Nickolas Zheng</u>	4/10/2023		P01465726
	Firm's name ▶ Deloitte Tax LLP			Firm's EIN ▶ 86-1065772	
	Firm's address ▶ 200 Berkeley Street Boston, MA 02116			Phone no. 617-437-2000	

FORM 8937 – REPORT OF ORGANIZATIONAL ACTIONS AFFECTING BASIS OF SECURITIES
Reverse Stock Split

Enliven Therapeutics, Inc. (F/K/A Imara Inc.)
81-1523849

ATTACHMENT 1

Part II

14. On February 23, 2023, a wholly owned subsidiary of Imara Inc. (“Imara”) merged with and into Enliven Therapeutics, Inc. (“Old Enliven”), with Old Enliven surviving the merger. As a result, Old Enliven became a wholly owned subsidiary of Imara. Following the closing of the merger, Imara changed its name to Enliven Therapeutics, Inc. (“New Enliven”).

Immediately prior to the closing of the merger, Imara executed a 1-for-4 reverse stock split of its common stock, i.e., for each 4 shares held one share was received. Immediately prior to the reverse stock split, Imara obtained its stockholder approval to increase its authorized common shares from 200 million to 400 million. The reverse stock split proportionately reduced the number of authorized shares of Imara’s common stock from 400 million shares to 100 million shares. The number of outstanding common shares was also reduced as a result of the reverse stock split.

The reverse stock split affected all issued shares of Imara common stock, as well as the number of authorized shares of Imara’s common stock and the number of shares of common stock available for issuance under Imara’s equity incentive plan; however, it did not change the par value of Imara’s common stock or the authorized and outstanding number of shares of Imara’s preferred stock. No fractional shares of common stock were issued in connection with the reverse stock split; any stockholders who would otherwise have been due a fractional share of common stock received a proportional cash payment instead of such fractional share.

**Report of Organizational Actions
 Affecting Basis of Securities**

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name Enliven Therapeutics, Inc. (F/K/A Imara Inc.)		2 Issuer's employer identification number (EIN) 81-1523849	
3 Name of contact for additional information Investor Relations	4 Telephone No. of contact 720-647-8519	5 Email address of contact IR@EnlivenTherapeutics.com	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact 6200 Lookout Road		7 City, town, or post office, state, and ZIP code of contact Boulder, CO 80301	
8 Date of action February 23, 2023	9 Classification and description Name Change		
10 CUSIP number	11 Serial number(s)	12 Ticker symbol ELVN	13 Account number(s)

Part II Organizational Action Attach additional statements if needed. See back of form for additional questions.

14 Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action ▶ On February 23, 2023, a wholly-owned subsidiary of Imara Inc. ("Imara") merged with and into Enliven Therapeutics, Inc. ("Old Enliven"), with Old Enliven surviving the merger. As a result, Old Enliven became a wholly-owned subsidiary of Imara. Following the closing of the merger, Imara changed its name to Enliven Therapeutics, Inc. ("New Enliven").

15 Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis ▶ If the name change is considered to be a reorganization under section 368(a)(1)(F) with a section 354 exchange then the basis of a share considered to be received should be the same as the basis of a share considered to be surrendered in exchange for that share received.

16 Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation date ▶ If the name change is considered to be a reorganization under section 368(a)(1)(F) with a section 354 exchange then the basis of a share considered to be received should be the same as the basis of a share considered to be surrendered in exchange for that share received.

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ section 368(a)(1)(F), 354, 358, and Treas. Reg. Sec. 1.358-2.

18 Can any resulting loss be recognized? ▶ NO

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ The transaction occurred during the calendar year ending December 31, 2023.

Sign Here

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

DocuSigned by:
 Signature ▶ Ben Hohl Date ▶ 4/10/2023
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Print your name ▶ Ben Hohl Title ▶ Chief Financial Officer

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	<u>Nickolas Zheng</u>	<u>Nickolas Zheng</u>	<u>4/10/2023</u>		<u>P01465726</u>
	Firm's name ▶ <u>Deloitte Tax LLP</u>	Firm's EIN ▶ <u>86-1065772</u>		Phone no. <u>617-437-2000</u>	
	Firm's address ▶ <u>200 Berkeley Street Boston, MA 02116</u>				

Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name		2 Issuer's employer identification number (EIN)	
Enliven Therapeutics, Inc. (F/K/A Imara Inc.)		81-1523849	
3 Name of contact for additional information	4 Telephone No. of contact	5 Email address of contact	
Investor Relations	720-647-8519	IR@EnlivenTherapeutics.com	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact		7 City, town, or post office, state, and ZIP code of contact	
6200 Lookout Road		Boulder, CO 80301	
8 Date of action		9 Classification and description	
February 23, 2023		Issuance of the Contingent Value Right (CVR)	
10 CUSIP number	11 Serial number(s)	12 Ticker symbol	13 Account number(s)

Part II Organizational Action Attach additional statements if needed. See back of form for additional questions.

14 Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action ▶ Please see attachment.

15 Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis ▶ Each share of Imara stock outstanding as of February 22, 2023 received a CVR issued by Imara subject to and in accordance with the terms and conditions of a Contingent Value Right Agreement. To the extent the distribution on a share of Imara common stock exceeds a shareholder's allocable portion of the current and accumulated earnings and profits with respect to the share of stock, there would be a reduction to the shareholder's basis in the share of stock to the extent of available basis in the share.

16 Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates ▶ There would be a reduction to the shareholder's basis in the share of stock to the extent of available basis in the share if the distribution on a share of Imara common stock exceeds a shareholder's allocable portion of the current and accumulated earnings and profits with respect to the share of stock.

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶
Section 301(c)

18 Can any resulting loss be recognized? ▶ NO

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶
The transaction occurred during the calendar year ending December 31, 2023.

Sign Here
Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.
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	Firm's name ▶ <u>Deloitte Tax LLP</u>	Firm's EIN ▶ <u>86-1065772</u>		Phone no. <u>617-437-2000</u>	
	Firm's address ▶ <u>200 Berkeley Street Boston, MA 02116</u>				

FORM 8937 – REPORT OF ORGANIZATIONAL ACTIONS AFFECTING BASIS OF SECURITIES
Issuance of the Contingent Value Right (CVR)

Enliven Therapeutics, Inc. (F/K/A Imara Inc.)
81-1523849

ATTACHMENT 1

Part II

14. On February 23, 2023, a wholly-owned subsidiary of Imara Inc. (“Imara”) merged with and into Enliven Therapeutics, Inc. (“Old Enliven”), with Old Enliven surviving the merger. As a result, Old Enliven became a wholly-owned subsidiary of Imara. Following the closing of the merger, Imara changed its name to Enliven Therapeutics, Inc. (“New Enliven”).

On February 22, 2023, prior to the closing of the merger, Imara issued one contingent value right (“CVR”) for each outstanding share of Imara common stock held by stockholders of Imara as of February 22, 2023. The CVR is a non-transferrable contractual right to receive payment upon the occurrence of certain events related to a prior transaction. Imara will report the issuance of the CVRs to Imara stockholders as a distribution of property with respect to Imara common stock. Each Imara stockholder will be treated as receiving a distribution in an amount equal to the fair market value of the CVRs issued to such Imara stockholder on the date of the issuance.