CONFLICT OF INTEREST POLICY

POLICY

It is the policy of Allient Inc. and its subsidiaries (collectively referred to herein as the "Company") to encourage employees to participate in outside activities that are consistent with the best interest of both the Company and the employee. As a condition of employment, however, employees are required to avoid any situation that involves, may involve or potentially may involve a Conflict of Interest or has the appearance of a Conflict of Interest. To protect the interests of both the employee and the Company, an activity that involves an actual, potential or appearance of a Conflict of Interest may be undertaken only after disclosure by the employee to Corporate Legal Counsel ("Compliance Officer") and review and approval by the Compliance Officer or the Corporate President and CEO or the Lead Independent Director of Allient Inc. (the "Lead Independent Director"), as applicable.

APPLICATION

This policy is applicable to all regular, full-time, part-time and temporary employees as well as all officers and members of the Board of Directors of the Company.

DEFINITION OF CONFLICT OF INTEREST

In general terms, a conflict of interest is any activity, interest, or relationship that affects or may have the appearance of affecting the objectivity, judgment, or effectiveness of an employee in the performance of his/her responsibilities for the Company. If an employee is involved in an activity or has a personal or financial interest that would or could cause a reasonable person to question the employee's impartiality when performing his/her responsibilities, then it would or could also constitute a conflict of interest. Therefore, all actual or potential conflicts need to be disclosed early and Company guidelines and procedures must be followed. The consequences of not doing so could result in a negative impact to the Company's business relationships and reputation, as well as affect the job status of employees directly.

Examples of Conflict of Interest include, but are not limited to:

Outside Employment / Financial Dealings / Supervision of Employees:

- An employee or a member of the employee's family serving as a director, officer, partner, consultant or contractor of, or in a managerial position with, or employed by, a present or prospective competitor, customer, supplier or other third-party doing business with the Company.
- An employee or a member of his/her family purchasing, and/or selling Allient stock or securities based on confidential or insider information.
- An employee or a member of his/her family purchasing, and/or selling stock or securities of another corporation with knowledge of confidential or insider information that one or more significant transactions involving the Company are under consideration.
- An employee or a member of his/her family purchasing and/or selling equipment, real estate, materials, or other property to or from the Company, or the purchase or sale of which is contemplated by the Company.

- A substantial financial interest, generally defined as greater than one percent (1%) or the outstanding securities issued by a corporate entity or ten percent (10%) of the assets of an unincorporated entity, held by an employee or a member of an employee's family in a present or prospective competitor, customer, supplier or other third-party doing business with the Company.
- Borrowing of funds or having a loan secured by an employee or members of an employee's family from present or prospective competitors, customers, suppliers or other third-parties doing business with the Company (borrowing from banks or other recognized financial institutions with which the Company does business is not included).
- Acting as a broker, finder, go-between or otherwise for the benefit of a third party in transactions involving or potentially involving the Company or its interests.
- Any other arrangement or circumstance, including the employee's family or their personal relationships, which might dissuade the employee from acting in the best interest of the Company.
- A manager or supervisor who is in a direct or indirect supervisory relationship with a family member or one with whom he/she is personally involved (marriage, engagement, or courtship)

Gifts and Hospitality

- The giving[1] or acceptance of gifts with a value greater than $200, or other favors, by an employee or a member of an employee's family from present or prospective competitors, customers, suppliers or other third-parties doing business with the Company unless such are consistent with customary business practices of a particular country or culture, modest in value and not in violation of any applicable law or any policy of the recipient's employer.
- The giving[1] or acceptance of gifts from the same party where the aggregate value of those gifts exceeds $200 in any twelve (12) month period.
- The acceptance of entertainment (e.g. sporting events) that: (i) may reasonably be viewed as excessive and too frequent in the context of the business occasion, (ii) the employee knows or reasonably should know that the gift giver is not permitted to provide such entertainment, (iii) the gift giver is not present for the event, (iv) entertainment that is otherwise prohibited by local Allient management, or (v) is of a nature that is or may reasonably be considered to be inappropriate in terms of type and/or venue.
- The offering[1] of entertainment (e.g. sporting events) by an employee that: (i) may reasonably be viewed as excessive and too frequent in the context of the business occasion, (ii) the employee knows or reasonably should know that is not permitted by the Company, (iii) the employee is not present for the event, (iv) entertainment that is otherwise prohibited by local management, or (v) is of a nature that is or may reasonably be considered by the Company to be inappropriate in terms of type and/or venue.

[1] Note that this policy should not be construed as authorization to provide any gifts or entertainment at any level. Employees wishing to do so should obtain their manager's approval prior to taking any such action.

EMPLOYEE'S RESPONSIBILITY/PROCEDURE

Employees who are supervisors, managers and senior managers will be required to annually certify as to their respective compliance with this policy with their local HR Department. The local HR Department will advise the Compliance Officer of any conflicts of interest reported on such forms. Furthermore, each employee:

- Has the responsibility to disclose any contemplated or existing activity, interest, or relationship that could impair his/her objectivity, judgment, or effectiveness as an employee of the Company.
- Is expected to discuss and/or disclose those issues and/or activities whenever: (i) the employee is in doubt as to whether or not such presents an actual or potential conflict of interest or the appearance of a conflict of interest; or when the employee knows that such issues/activities have a potential or apparent conflict. Through this action, the employee protects his/her own interests as well as those of the Company.
- Is required to report any potential Conflict of Interest by completing the Employee Acknowledgement and Reporting form (attached) and submitting it to the Compliance Officer.
- Questions regarding Conflict of Interest should be directed to the Compliance Officer.

The Compliance Officer will advise management of the overall compliance by employees with this Policy. Further, Corporate Legal Counsel will review all disclosures of actual and potential conflicts of interest with the reporting employee and management. All conflicts of interest that are reviewed and deemed acceptable will be monitored by the Compliance Officer, Corporate President and CEO; *provided*, that (a) any conflict of interest involving the Compliance Officer shall be reviewed, approved and monitored by the Corporate President and CEO and (b) any conflict of interest involving the Corporate President or CEO shall be reviewed and approved by the Board of Directors of the Company and monitored by the Lead Independent Director.