

REGULATION FD CORPORATE COMMUNICATIONS POLICY

Introduction

This is our disclosure policy concerning communications with securities analysts, institutional investors, money managers, investment advisers, securities brokers, or mutual funds and with our shareholders ("Specified Persons").

Regulation FD prohibits the selective disclosure of material, nonpublic information, such as earnings warnings, to Specified Persons, before disclosing such information to the general public. This policy is intended to assist our authorized spokespersons to comply with Regulation FD and sets forth our commitment to fair disclosure of information about us without advantage to any particular analyst, investor or other Specified Person.

This policy applies to all communications by us and our directors, officers, and other employees with Specified Persons. This policy shall be distributed to all our employees.

I. Core policies

- A. <u>Authorized spokespersons</u>. No one except the CEO and CFO ("authorized officers") shall communicate with Specified Persons on matters concerning Allient Inc. and each of its subsidiaries and affiliates, separately or collectively, except that other officers may respond to calls from Specified Persons by referring the callers to already-public information in our SEC filings, press releases, or our website. Other officers and employees may communicate with Specified Persons only after an authorized officer has authorized such employee or officer to communicate with Specified Persons and has reviewed and authorized the scope and content of such communication for disclosure to such Specified Persons(s) subject to any other condition such authorized officer deems necessary to comply with this policy. If you receive a request from someone outside of our company for material nonpublic information, you should not respond. Instead, ask for the person's name and number and contact an authorized officer.
- B. No selective disclosure of material nonpublic information. Our policy is to disclose material information about us publicly and not selectively. We prohibit the intentional disclosure of material, nonpublic information to Specified Persons or shareholders unless that information is at the same time or previously disclosed to the public. If one of our representatives unintentionally discloses material nonpublic information to Specified Persons or shareholders, we will promptly (within 24 hours) make public disclosure of that information, usually through a press release. If there is an intervening weekend or holiday, the disclosure will be before the open of market on the next trading day.
- C. <u>Policy on press releases and quarterly earnings releases</u>. We will generally announce material information via a press release, in addition to the required SEC filings we make from time to time. In the case of regular period-end announcements of financial results, known as earnings releases, our policy is:

- to issue a press release reporting the results before or after the market closes;
- to conduct a pre-announced, publicly accessible conference call or webcast at which supplemental comments may be provided to the analysts and the public;
- to allow a limited group to ask questions on the conference call, as long as all listeners can hear the questions and answers; and
- to make an audio recording of the conference call publicly available through our website for a reasonable period of time subject to our website archive policies in effect from time to time.
- D. <u>Corrections and updates</u>. If a material public statement is found to be incorrect when made, we will endeavor to correct it immediately via appropriate public disclosure.
- E. <u>Communications with analysts</u>. We will not review or comment on analyst reports or models except that the CEO or CFO may, in his or her judgment, review analyst notes or questions as to matters of historical accuracy, which can be verified by reference to already public information, such as our SEC filings, press releases, or information posted on our website. No authorized officer will provide "comfort" with respect to any earnings estimate made by an analyst or otherwise "walk the Street" up or down. If any analyst inquires as to the analyst's estimates the authorized officer should follow the "no comment" policy. An authorized officer will not otherwise provide material information to an analyst, unless this material information has already been recently disclosed to the public in accordance with this policy.
- F. Regulation G requirements relating to Non-GAAP ("pro forma") financial information. If we make any oral or written disclosures to the public concerning "non-GAAP financial measures" (e.g., "pro forma" earnings results, EBITDA, or similar figures), we must comply with SEC Regulation G. In general, any written disclosure of non-GAAP financial measures must include a presentation of the most directly comparable GAAP figure and provide a quantitative reconciliation between the non-GAAP and GAAP numbers. This information must not misstate or omit important facts, and should give equal prominence to the GAAP and non-GAAP numbers and otherwise fairly present both sets of figures.
 - If historical non-GAAP measures are included, we must also disclose why the non-GAAP information is substantively useful to investors.
 - If oral non-GAAP information is made public, the full reconciliation information must be orally disclosed in an acceptable manner or previously posted on our website with adequate notice of this posting as prescribed in Regulation G.
 - Our authorized officers and are expected to be familiar with the general requirements of Regulation G and avoid any public reference orally or in writing to any non-GAAP financial measures unless these disclosures are reviewed in advance under Regulation G by our CFO.

• This is a complex regulation that is not fully summarized above. Our authorized officers will periodically review and communicate appropriate policies to help assure compliance with Regulation G.

II. Explanation of core policies

- A. <u>What are communications?</u> Below are some examples of communications covered by this policy. This is not an exclusive list.
 - Speeches, interviews, industry and investor conferences
 - Quarterly earnings releases and related conference calls
 - Responding to market rumors about the trading and price of our shares, our business or our financial results or any other market rumors
 - Any contacts with financial analysts covering us
 - Reviewing analysts' reports on us
 - Analyst and investor visits
 - Postings on our website
 - Social media communications including through corporate blogs, employee blogs, chat boards, Twitter, Facebook, LinkedIn, YouTube and any other non-traditional means of communication
- B. What is material nonpublic information? Information is material if there is a substantial likelihood that a reasonable investor would consider it important in making an investment decision. Information is nonpublic if it has not been disclosed to the public as described below.

Nonexclusive examples of information to be considered material under this policy include:

- Earnings information and quarterly results;
- The likelihood of meeting analysts' expectations for current or future periods
- Significant changes in the Company's prospects or strategy
- Significant write-downs in assets or increases in reserves
- Developments regarding significant litigation or government agency investigations
- Liquidity problems
- New products, developments with suppliers or customers (such as the acquisition or loss of a contract)

- Major changes in the Company's management or the board of directors
- Changes in dividends or dividend policy
- extraordinary borrowings
- Major changes in accounting methods or policies, changes in auditors or auditor notification that we can no longer rely on an audit report
- Award or loss of a significant contract
- Cybersecurity risks and incidents, including vulnerabilities and breaches
- Changes in debt ratings
- Bankruptcy
- Insider buying or selling of securities
- Proposals, plans or agreements, even if preliminary in nature, involving mergers, acquisitions, divestitures, recapitalization, strategic alliances, licensing arrangements, or purchases or sales of substantial assets
- Events regarding our securities (such as defaults on senior securities, calls of securities for redemption, repurchase plans, stock splits or changes in dividends, changes to the rights of securityholders public or private sales of additional securities or information related to any additional funding)
- Management or organizational changes.

Material information is not limited to historical facts but may also include projections and forecasts. With respect to a future event, such as a merger, acquisition or introduction of a new product, the point at which negotiations or product development are determined to be material is determined by balancing the probability that the event will occur against the magnitude of the effect the event would have on a company's operations or stock price should it occur. Thus, information concerning an event that would have a large effect on stock price, such as a merger, may be material even if the possibility that the event will occur is relatively small. When in doubt about whether particular nonpublic information is material, you should presume it is material.

- C. <u>Means of making public disclosures</u>. Public disclosure may be made by:
- issuing a widely disseminated press release via Business Wire or similar service;
- a publicly accessible conference call or webcast, for which there has been adequate advance public notice;
- filing of an SEC disclosure document such as a Form 8-K (we expect to utilize Form 8-K only for items required to be reported on that form or for special, non-ordinary course matters); and
- a combination of methods, including posting the information on our website.
- D. <u>Public access to analyst conference calls</u>. When we conduct quarterly analyst conference calls, we will allow the public to listen to the call via telephone dial-in or webcast systems. We may, from time to time, hold additional open analyst conference calls if the public is similarly allowed to listen in.
- E. <u>Announce conference calls via advance press release</u>. A reasonable time before a scheduled analyst conference call, we will issue a press release which provides the date and time of the scheduled call and the specific information needed for a member of the public to dial in or access the call over the Internet.
- F. Records and scripts of material communications. All communications with Specified Persons, except for specified routine communications otherwise described in this policy, will be scheduled ahead of time and a record of each such communication will be maintained. This includes analyst conference calls, phone calls, meetings, investor or investment banking firm conferences, breakout sessions, and other similar communications. To the extent practicable, all such communications will be based on scripts or outlines prepared in advance for both the main presentation and anticipated ranges of questions. The appropriate "forward-looking statement" disclaimer will be given at the beginning of each such communication and, if appropriate, prior to specific portions of the communication involving guidance.
- G. <u>Key spokespersons to keep current on company information</u>. All of our spokespersons are responsible for keeping current on what has and has not been publicly disclosed by us. This means, at a minimum, reviewing all SEC filings and press releases and participating in or later listening to a recording of all public conference calls.
- H. <u>Rumors: No Comment Policy</u>. We will not comment on market rumors in the normal course of business. When it is learned that rumors about our company are circulating, authorized officers should state only that it is our policy to not comment on rumors. If the source of the rumor is found to be internal, counsel should be consulted to determine the appropriate response.
- I. <u>Consult our Corporate Secretary on questions or concerns</u>. Anyone, including all of our spokespersons, should confer with our Corporate Secretary whenever in doubt about whether information is material or other questions under this policy. Decisions about materiality

should, when possible, be made prior to the occasion on which the discussion is to take place to avoid the need to make materiality judgments "on the spot."

J. <u>Limited exceptions apply to certain people and in special transactions</u>. Exceptions to this policy may apply with respect to certain people who are required by professional responsibility or by contract to keep our information confidential. These include our attorneys, our auditors and accountants, our investment bankers and people or entities that are subject to nondisclosure agreements with us. In addition, communications with investment bankers and underwriters in connection with registered public offerings and communications with parties who have entered into nondisclosure agreements in connection with acquisitions, private placements, or other special transactions are permitted under this policy. If in doubt, consult with our Corporate Secretary on a case-by-case basis to determine the applicability and scope of these exceptions from this policy.