

ALLURION TECHNOLOGIES, INC.

CORPORATE COMMUNICATIONS POLICIES AND PROCEDURES

August 1, 2023

To ensure that the disclosures of material information about Allurion Technologies, Inc. and its subsidiaries (together, the “Company”) by its directors, officers, employees and consultants are made fairly and in compliance with federal securities laws, the Company has adopted these policies and procedures. These Corporate Communications Policies and Procedures are distributed to all of the Company’s directors, officers, employees and consultants and consist of: (i) a statement of the Company’s policies regarding the disclosure of material nonpublic information and (ii) a set of procedures the Company has implemented with respect to all forms of public disclosure, including filings with the Securities and Exchange Commission (“SEC”), press releases, conference calls, webcasts, presentations, one-on-one communications, responses to inquiries and website postings. These Corporate Communications Policies and Procedures, which are components of the Company’s overall disclosure controls and procedures, will be evaluated from time to time by the Board of Directors and may be revised as necessary.

These Corporate Communications Policies and Procedures do not replace the primary responsibility of each director, officer, employee and consultant to understand and comply with the prohibitions on selective disclosure and other disclosure obligations under the federal securities laws. All directors, officers, employees and consultants should also carefully review the Company’s Insider Trading Policies and Procedures, Corporate Governance Guidelines, and Code of Business Conduct and Ethics, which also contain provisions relating to the proper disclosure of material information relating to the Company.

If you have any questions on these Corporate Communications Policies and Procedures or with respect to your obligations under federal securities laws generally, please contact the Company’s designated Compliance Officer, who is responsible for enforcing the Corporate Communications Policies and Procedures. The Company has designated its Corporate Counsel as its Compliance Officer. If the last-designated Compliance Officer has ceased to be employed by the Company, please contact the Company’s Chief Financial Officer or, in the absence of the Chief Financial Officer, the Chief Executive Officer, with any questions you may have.

A. CORPORATE COMMUNICATIONS POLICIES

1. Regulation FD Compliance

It is the policy of the Company that material nonpublic information about the Company may not be disclosed on a selective basis consistent with the Securities and Exchange Commission's Fair Disclosure Regulation ("Regulation FD"). Regulation FD requires that whenever a "senior official" of the Company *intentionally* discloses "material" nonpublic information about the Company to "market participants" or stockholders, the Company must widely disseminate that information to the public at large either simultaneously or in advance. Regulation FD also requires that whenever material nonpublic information has been *inadvertently* disclosed by senior officials on a selective basis to market participants or stockholders, the Company must promptly disclose that same information to the general public. Regulation FD does not apply to disclosures made to persons who owe a duty of trust or confidence to the issuer (*e.g.*, the Company's attorneys, auditors or advisors or persons who have agreed in writing to maintain the confidentiality of communicated information).

- "Senior officials" include any director (including any non-employee director), executive officer, investor relations or public relations officer or other person with similar functions.
- Information is "material" if there is a substantial likelihood that a reasonable investor would consider the information important to a decision to buy, hold or sell stock and would therefore be likely affect the price of the stock. Either positive or negative information may be material. Material developments often relate to earnings results or expectations, financial forecasts, mergers, acquisitions, tender offers, joint ventures, changes in assets or divestitures, the introduction of major new product lines or discoveries, clinical trial results, the occurrence of serious adverse events, the receipt or denial of regulatory approvals, changes in relationships with major customers, the gain or loss of important contracts, disputes with major suppliers or customers, major personnel changes, changes in auditors or notification that the Company may no longer rely on an auditor's audit report, public offerings, private sales or repurchases of debt or equity securities, changes in the rights of outstanding securities, major financing developments, government investigations, or the threat or settlement of major litigation.
- "Market participants" include broker-dealers (including employees of broker-dealers, such as analysts and investment bankers), investment advisers, institutional investment managers and investment companies, including venture capital funds.

Monetary penalties and other sanctions may be imposed on both the Company and its senior officials if (a) material nonpublic information is intentionally disclosed on a selective basis and at the time of disclosure the senior official either knew or was reckless in not knowing that the information was both material and nonpublic, or (b) material nonpublic information is inadvertently disclosed on a selective basis and then not subsequently publicly disclosed if the senior official learns of the inadvertent disclosure and knows or was reckless in not knowing that the information was both material and nonpublic. Accordingly, it is the policy of the Company to immediately disclose material information by broadly disseminated press release and

Form 8-K after it discovers that any such information has been disclosed on a selective basis (and in no event after the later of 24 hours or the commencement of the next day's trading). The Compliance Officer is authorized to immediately investigate, analyze and act upon any inadvertent or unauthorized disclosures in violation of these Corporate Communications Policies and Procedures.

2. Disclosure Controls and Procedures

It is the policy of the Company that all information required to be disclosed in the reports that it files or submits under the Securities Exchange Act of 1934, as amended, and other public communications must be accurate and complete in all material respects and comply in all material respects with the securities laws of the United States. In furtherance of this policy, the Company has established disclosure controls and procedures that govern its disclosures to the SEC and to the public generally. These disclosure controls and procedures are designed to ensure that all information that may be required to be disclosed under applicable securities laws and securities exchange requirements is:

- reported to the individuals in the Company responsible for the preparation of the Company's SEC reports and other public communications;
- analyzed to determine whether public disclosure is appropriate; and
- if appropriate, disclosed in a timely and accurate manner and in compliance with Regulation FD and other securities laws and stock exchange requirements.

The Company's disclosure controls and procedures include the creation of a Disclosure Committee to assist in reviewing and evaluating the Company's public disclosures. The Disclosure Committee operates under a set of Disclosure Committee Guidelines, which have been approved by the Audit Committee of the Company, to monitor and review the accuracy and completeness of the public disclosures made by the Company. The Disclosure Committee consists of the principal accounting officer or controller, the general counsel or other senior legal official with responsibility for disclosure matters, the principal risk management officer (if any), the chief investor relations officer (if any), the chief human resources officer, the internal auditor (if any), and such other officers or employees, including individuals associated with the Company's key business units, as the Company deems appropriate. The composition of the Disclosure Committee will be evaluated from time to time pursuant to the Disclosure Committee Guidelines and may be revised as necessary.

If you are unsure at any time as to whether you are in possession of material nonpublic information about the Company or if you are aware of events that you believe may raise disclosure issues, you should contact the Compliance Officer or a member of the Company's Disclosure Committee for clarification.

3. Company Spokespersons

It is the policy of the Company that only the Chairman of the Board, Chief Executive Officer, President, Chief Financial Officer, Chief Commercial Officer and certain other employees designated by them in writing (the "Company Spokespersons") are authorized to

speak on behalf of the Company with any market participant, member of the media or stockholder. The Company may designate certain Company Spokespersons to speak with specific members of the media or with respect to specific aspects of the Company's business. Requests for information about the Company should *in all cases* be directed promptly to a Company Spokesperson. This centralization of communication is designed to ensure that the information the Company discloses is accurate and considered in light of previous disclosures. Formal announcements, such as SEC filings, press releases and presentations, are generally reviewed by management and legal counsel before they are made public. Any communications that do not go through this review process create an increased risk of civil and criminal liability to the Company and to the individual responsible for the communication.

Only Company Spokespersons are authorized to have substantive discussions about any aspect of the Company's business with any market participant, member of the media or stockholder. The Company's employees may not disclose or discuss any material nonpublic information about the Company or its activities with any person outside the Company, except as may be required in connection with the proper performance by the employee of his or her duties on behalf of the Company (*e.g.*, a salesperson can discuss sales and marketing topics with a customer). However, if an employee of the Company believes that he or she has or will communicate particularly sensitive non-public information about the Company to a third-party business contact, the employee should contact the Compliance Officer immediately. In addition, if an employee becomes aware that an unauthorized disclosure of material nonpublic information about the Company was made on a selective basis, the employee should immediately notify the Compliance Officer or a member of the Disclosure Committee.

4. No Comment Policy

It is the policy of the Company that it will not comment on rumors concerning Company developments, including, without limitation, rumors concerning public offerings of its securities, acquisitions or dispositions, or restructurings or similar matters, except as approved by a Company Spokesperson (or a designee of such Company Spokesperson) after consultation with the Compliance Officer or a member of the Disclosure Committee.

5. Chat Rooms, Blogs or other Websites

The Company is committed to preventing inadvertent disclosures of material nonpublic information, preventing unwitting participation in Internet-based securities fraud, and avoiding the appearance of impropriety by persons associated with the Company. Accordingly, it is the policy of the Company that directors, executive officers, employees and consultants are prohibited from making any comments or postings in chat rooms, blogs or other websites concerning the Company, except as approved by the Compliance Officer or a member of the Disclosure Committee. These forums have the potential to move a stock price significantly, and very rapidly – yet they are often filled with inaccuracies. The Company also prohibits directors, executive officers, employees and consultants from participating in chat rooms, blogs or other websites relating to competitors of the Company or entities with which the Company has a significant business relationship. These restrictions apply whether or not you identify yourself as associated with the Company. It is a common misperception that the identity of participants on Internet discussion forums is secret. Government agencies and individuals can obtain this information under certain circumstances, and thus there is no real “anonymity” on the Internet.

B. CORPORATE COMMUNICATIONS PROCEDURES

These Corporate Communications Procedures are designed to ensure that the Company's public disclosures are presented fully and fairly and in compliance with Regulation FD and all other securities laws and stock exchange requirements. These procedures apply to all forms of the Company's public disclosure, such as SEC filings, press releases, conference calls, webcasts, presentations, one-on-one communications, responses to inquiries and website postings ("Company Statements").

1. SEC Filings

The Disclosure Committee will be responsible for reviewing and supervising the preparation of the Company's annual, quarterly and current reports, proxy statements, information statements, registration statements and other information filed with the SEC. The procedures for ensuring the appropriate preparation of the Company's SEC filings are set forth in Disclosure Committee Guidelines. The Disclosure Committee and Compliance Officer will also be responsible for determining if an event or circumstance warrants the filing of a Form 8-K to meet the Company's SEC reporting obligations.

2. Press Releases

When the Company wishes to disclose material nonpublic information to the public, it is important that the information be widely distributed to comply with SEC requirements and stock exchange requirements. The normal means of such distribution should be a press release. The content of all press releases must be approved by the Disclosure Committee and reviewed by investor relations personnel and legal counsel. Information contained in the press release may also be widely distributed by filing or furnishing the information with or to the SEC in a Current Report on Form 8-K. The Disclosure Committee will be responsible for determining whether a press release should also be filed or furnished using a Form 8-K.

Press releases regarding the Company's historical financial results or earnings or guidance about future financial performance must be furnished on a Form 8-K with the SEC within four business days of such release. The issuance of such press releases should be made not more than 48 hours prior to any conference call or webcast relating to such release and the related Form 8-K will be filed or furnished with the SEC prior to any such conference call or webcast, in order to avoid having to also furnish a transcript of such conference call or webcast to the SEC.

Each press release should be carefully reviewed to determine if it contains any non-GAAP financial measures. Any press releases that contain any non-GAAP financial measures must include the most directly comparable GAAP measure in an equally or more prominent presentation and a quantitative reconciliation, by schedule or other clearly understandable method, of the differences between the non-GAAP financial measure and the most directly comparable GAAP measure. In addition, the Company will provide a statement of the reasons why management believes that each non-GAAP financial measure provides useful information to investors and, if applicable, a statement of additional purposes for which management uses each non-GAAP financial measure. The earnings press release or other announcement (along with any required Regulation G disclosures for any non-GAAP financial measures to be discussed

during the call or webcast that were not included in the earnings press release) should be posted on the Company's website not later than the time of the conference call or webcast.

Each press release that contains a forward-looking statement by the Company should also contain "safe harbor" disclosures in the form provided below for protection under the Private Securities Litigation Reform Act of 1995 or such other form as approved by the Disclosure Committee, investor relations personnel and legal counsel:

Statements we make in this press release may include statements which are not historical facts and are considered forward-looking within the meaning of Section 27A of the Securities Act and Section 21E of the Securities Exchange Act, which are usually identified by the use of words such as "anticipates," "believes," "estimates," "expects," "intends," "may," "plans," "projects," "seeks," "should," "will," and variations of such words or similar expressions. We intend these forward-looking statements to be covered by the safe harbor provisions for forward-looking statements contained in Section 27A of the Securities Act and Section 21E of the Securities Exchange Act and are making this statement for purposes of complying with those safe harbor provisions. These forward-looking statements reflect our current views about our plans, intentions, expectations, strategies and prospects, which are based on the information currently available to us and on assumptions we have made. Although we believe that our plans, intentions, expectations, strategies and prospects as reflected in or suggested by those forward-looking statements are reasonable, we can give no assurance that the plans, intentions, expectations or strategies will be attained or achieved. Furthermore, actual results may differ materially from those described in the forward-looking statements and will be affected by a variety of risks and factors that are beyond our control including, without limitation, (i) changes in regulatory approvals, customer demand, supply chain, the regulatory environment and our executive team, (ii) the impact of global health crises (including the COVID-19 pandemic), (iii) the imposition or heightening of sanctions or (iv) economic or military measures in relation to the current Russia-Ukraine conflict, among others, as well as those set forth in [the final prospectus that was filed with the SEC on July 7, 2023] [Item 1A. Risk Factors of our Annual Report on Form 10-K for the year ended December 31, [___], as updated by our subsequently filed Quarterly Reports on Form 10-Q and our other SEC filings]. We assume no obligation to update publicly any forward-looking statements, whether as a result of new information, future events or otherwise.

All press releases should, at a minimum, be provided to the major wire services (*e.g.*, Dow Jones, Bloomberg, Reuters, AP, UPI and Business Wire) as well as the local press. All press releases should be kept available on the Company's website for a period of at least twelve months, with older information archived in a designated "archive" section on the Company's website with appropriate disclaimers, including a disclaimer of any duty to update.

3. Conference Calls, Webcasts and Presentations

In connection with the issuance of a press release reporting our quarterly financial results, the Company will sponsor a conference call to discuss our results of operations and related matters. From time to time, the Disclosure Committee may determine that additional conference calls are appropriate in order to discuss material Company developments. In addition, Company Spokespersons may make presentations at industry or investor conferences or join related conference calls or webcasts. The following are guidelines related to quarterly earnings calls and other conference calls, webcasts or presentations:

- The Company should prepare and utilize scripts for conference calls, webcasts and presentations at industry or investor conferences, which must be reviewed in advance by the Compliance Officer and, if applicable, by members of the Disclosure Committee and legal counsel.
- The Company will make an announcement, via a press release using newswire services or other means to ensure broad dissemination, a “reasonable period of time” before each conference call, webcast or presentation in which material nonpublic information may be disclosed. Such announcement will disclose the date and time of the call, webcast or presentation, the subject matter and instructions for how to access the call, webcast or presentation.
- Where material nonpublic information regarding the Company is likely to be disclosed at a presentation to be made at an investor or industry conference, the Company will webcast the presentation (preceded by advance public notice) or, prior to or simultaneously with such conference, issue a broadly disseminated press release or file or furnish a Form 8-K with the SEC disclosing such information.
- Where oral disclosures that include non-GAAP financial measures will be made during a conference call, webcast or presentation, the Company will post any quantitative reconciliation requirement of Regulation G on its website not later than simultaneously with the disclosure of the non-GAAP financial measure and will advise the conference call, webcast or presentation audience of the availability and location of this disclosure during the call, webcast or presentation. In addition, each conference call, webcast or presentation that includes a non-GAAP financial measure should be preceded by the following statement:

On this [conference call, webcast or presentation] we may refer to certain non-GAAP financial measures, such as Adjusted EBITDA, adjusted EBIT, and free cash flow. You can find a tabular reconciliation of these non-GAAP financial measures to the most directly comparable GAAP measures [in our earnings release][on the investor relations page of our website].

- Each conference call, webcast and presentation that contains or is likely to contain a forward-looking statement by the Company should be preceded by a statement containing the following required “safe harbor” disclosures for protection under the Private Securities Litigation Reform Act of 1995:

Before we begin I would like to briefly discuss the use of forward-looking statements on this [conference call, webcast or presentation]. Statements we make on this [call, webcast or presentation] may include statements which are not historical facts and are considered forward-looking within the meaning of Section 27A of the Securities Act and Section 21E of the Securities Exchange Act, which are usually identified by the use of words such as “anticipates,” “believes,” “estimates,” “expects,” “intends,” “may,” “plans,” “projects,” “seeks,” “should,” “will,” and variations of such words or similar expressions. We intend these forward-looking statements to be covered by the safe harbor provisions for forward-looking statements contained in Section 27A of the Securities Act and Section 21E of the Securities Exchange Act and are making this statement for purposes of complying with those safe harbor provisions. These forward-looking statements reflect our current views about our plans, intentions, expectations, strategies and prospects, which are based on the information currently available to us and on assumptions we have made. Although we believe that our plans, intentions, expectations, strategies and prospects as reflected in or suggested by those forward-looking statements are reasonable, we can give no assurance that the plans, intentions, expectations or strategies will be attained or achieved. Furthermore, actual results may differ materially from those described in the forward-looking statements and will be affected by a variety of risks and factors that are beyond our control including, without limitation, those set forth in [our earnings release issued earlier today][Item 1A. Risk Factors of our Annual Report on Form 10-K for the year ended December 31, [___], as updated by our subsequently filed Quarterly Reports on Form 10-Q and our other SEC filings]. We assume no obligation to update publicly any forward-looking statements, whether as a result of new information, future events or otherwise.

- Conference calls will be accessible by dial-in conference call or by Internet simulcast and archived on the Company’s website for 30 days.

If material nonpublic information is inadvertently disclosed on a selective basis on a conference call or webcast or at a presentation at an investor or industry conference, the Compliance Officer will work with the Disclosure Committee to immediately (and in no event after the later of 24 hours or the commencement of the next day’s trading) disclose such information by broadly disseminated press release and Form 8-K. The Company’s Compliance Officer is authorized to immediately investigate, analyze and act upon any non-intentional or unauthorized disclosures in violation of these Corporate Communications Policies and Procedures.

4. One-On-One Communications

No director, officer, employee or consultant of the Company may intentionally disclose material nonpublic information in one-on-one meetings or telephone calls with market participants or stockholders. At least one officer of the Company, in addition to the Company Spokesperson, should be present at all such calls or meetings to facilitate immediate detection of

inadvertent disclosures of material nonpublic information on a selective basis. Company Spokespersons and other participants on behalf of the Company present at such calls or meetings should have a clear understanding of the information publicly disclosed by the Company, limit the discussion to that information and avoid implicit indirect and nonverbal communication, by tone or gesture.

The Company should prepare and utilize scripts for all one-on-one calls or meetings with analysts, stockholders or potential investors. All scripts and other materials to be used for such calls or meetings must be reviewed in advance by the Compliance Officer and, if appropriate, by members of the Disclosure Committee and legal counsel. Participants should be informed prior to or at the beginning of each such call or meeting of the Company's disclosure policy and the topics that are off-limits (in accordance with these procedures or otherwise). Where material nonpublic information is likely to be disclosed at a one-on-one call or meeting, the Company will, prior to or simultaneously with such call or meeting, issue a broadly disseminated press release or file or furnish a Form 8-K with the SEC disclosing such information.

If material nonpublic information is inadvertently disclosed on a selective basis during a one-on-one call or meeting with analysts, stockholders or potential investors, the Compliance Officer will work with the Disclosure Committee to immediately (and in no event after the later of 24 hours or the commencement of the next day's trading) disclose such information by broadly disseminated press release and Form 8-K. The Company's Compliance Officer is authorized to immediately investigate, analyze and act upon any non-intentional or unauthorized disclosures in violation of these Corporate Communications Policies and Procedures.

5. Responses to Inquiries

Oral responses to inquiries concerning the business, legal or other matters of the Company shall be limited to that information that has been made publicly available and shall be made only by Company Spokespersons. The Company will not comment on rumors concerning Company developments, including, without limitation, rumors concerning its financial performance, public offerings of its securities or acquisitions. It is the Company's policy not to (i) discuss or confirm, on a nonpublic basis, earning estimates older than a very few days unless an updating release has been publicly disclosed or (ii) provide more specific material nonpublic quantitative (or numerical) guidance regarding qualitative terms that have been used in prior public disclosure. The Company will repeat or reaffirm only previously disclosed historical information about the Company when educating the public or third parties about the Company or when correcting misstatements about the Company.

If requested by an analyst to review a research report, the Company will not comment except to correct errors of fact and will not comment in any way on an analyst's forecasts or judgments. For venture capital investors, other major stockholders or others who need special access to information relating to the Company that has not been previously disseminated broadly to the public, the Company will endeavor to enter into confidentiality agreements. While these procedures do not prohibit Company Spokespersons from exchanging email correspondence with market participants or stockholders, these individuals should exercise particular caution when doing so.

6. Postings on the Company's Website

The Company will treat all disclosures on the Company's website like press releases and other written Company Statements. The Company Spokespersons will be responsible for reviewing and maintaining the content of all corporate-controlled web pages, approving all new material postings and directing the removal of any previously-posted, "stale" information. Before posting information on the Company's website, the Company Spokespersons will be responsible for ensuring that appropriate public disclosure has been made of any such information that could include or refer to material nonpublic information.

ACKNOWLEDGMENT

I hereby acknowledge that I have read, that I understand, and that I agree to comply with, the Corporate Communications Policies and Procedures of Allurion Technologies, Inc. I also understand and agree that I will be subject to sanctions, including termination of employment, that may be imposed by the Company, in its sole discretion, for violation of such Corporate Communications Policies and Procedures.

Date: _____

Signature: _____

Name: _____
(Please Print)

Title: _____