

Allurion Corporate Ethics and Business Conduct Policy

1. OBJECTIVE

Allurion Technologies is committed to protecting employees, consultants, contractors, customers, partners, vendors and the company from illegal or damaging actions by individuals, either knowingly or unknowingly. This policy establishes behavioral and ethical standards for employees, consultants, contractor, vendors and the company and serves to guide business behavior to ensure conduct that is ethical and aligned with Allurion values and mission.

2. SCOPE

This policy applies to all employees, consultants and contractors at Allurion Technologies (“Allurions”) and its subsidiaries.

3. PEOPLE MANAGER’S COMMITMENT TO ETHICS

People Managers must have an open-door policy and welcome suggestions or concerns from users. An open-door policy allows for a comfortable discussion of issues or concerns within the organization. People Managers must disclose any conflicts of interest regarding their position within Allurion Technologies.

4. ALLURIONS’ COMMITMENT TO ETHICS

- Allurion Technologies users shall treat everyone fairly, with mutual respect, promote a team environment and avoid the intent and appearance of unethical or compromising practices.
- Allurions shall acquaint themselves with and abide by the mission, values, vision, operating principles and policies.
- Every Allurion shall apply effort and intelligence in maintaining ethical values.
- Allurions shall refrain from condoning as well as participating in or engaging in dishonesty, fraud, deceit or misrepresentation.
- Every Allurion shall comply with all applicable legal regulations and legal statutes.

- Allurions shall strive to meet and exceed the requirements of their designated position.
- Allurions shall respect differences in people; this includes (but is not limited to) age, color, race, citizenship, place of origin, disability, gender, family status, etc.
- Allurions shall refrain from the use of profanity, verbal abuse or violence.
- Allurions shall maintain complete confidentiality regarding Allurion Technologies affairs and decisions, during and after their tenure with Allurion Technologies.
- Allurions shall respect and abide by management decisions.
- Allurions shall refrain from engaging in public criticism that would jeopardize the reputation of Allurion Technologies and its employees, consultants, contractors or appointees.

5. MAINTAINING ETHICAL PRACTICES

- Allurion Technologies shall reinforce the importance of ethical and integrity practices. All Allurions shall consistently maintain an ethical stance and support ethical behavior.
- Users must notify their supervisor if they have a conflict of interest or potential conflict of interest.
- Prohibited activities for staff and appointees include, but are not limited to:
 - Using their position to directly or indirectly benefit themselves, their spouse or their children;
 - Accepting gifts;
 - Giving preferential treatment or creating the appearance of giving any preferential treatment; or
 - Making personal use of Allurion Technologies resources, including its premises, equipment or supplies.

6. UNETHICAL BEHAVIOR

- Allurion Technologies shall avoid the intent and appearance of unethical or compromising practice in relationships, actions and communications. Allurions shall not participate in any acts of corruption, bribery or other illegal behavior.
- Unauthorized use or disclosure of trade secrets, marketing, operational, personnel, financial, source code and technical information integral to the success of Allurion Technologies is not permitted in any form.

- Allurion Technologies users shall not use corporate assets or business relationships for personal use or gain.
- Allurions shall not abuse their employment benefits. This can refer to time off, insurance, facilities, subscriptions or other benefits that the company offers.
- Allurions shall refrain from accepting gifts with a value exceeding \$100.00 from any person, business or entity.

Allurion reserves the right to change, discontinue or adopt any policy, with or without notice.

Effective April 3, 2023

Certification

I _____ certify that I have read and understood Allurion's Corporate Ethics and Business Conduct Policy. I agree to follow the policy, and I acknowledge that if I violate the policy set forth above there could be disciplinary actions taken up to and including termination.

Signature _____

Date _____