

LVG Code of Professional Conduct

LVG 职业行为准则

The LVG Code of Professional Conduct is binding for all Leverage employees.
LVG 职业行为准则对所有员工具有约束力。

Leverage employees agree to:
LVG 员工同意：

1. Engage in and promote honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships.

参与并提倡诚实和道德行为，包括以道德为基准处理个人和专业之间实际或明显的利益冲突关系。

2. Avoid conflicts of interest 避免利益冲突

Independence, integrity and transparency of our services are the foundation of our customers' trust in us.

服务的独立性，完整性和透明度是客户对我们信任的基础。

3. Take all reasonable measures to protect the confidentiality of non-public information about the Company and its subsidiaries and their customers obtained or created in connection with employee activities and to prevent the unauthorized disclosure of information unless required by applicable law or regulation.

采取一切合理措施，保护有关公司及其子公司及其客户在与员工活动相关的非公开信息的机密性，并防止未经授权披露信息，除非法律法规要求。

4. Zero tolerance of corruption 对腐败零容忍

Corruption distorts competition with the business world and causes damage to both individuals and society. Corruption can also result in actions being made under criminal and civil law for Leverage employees as well as for Leverage. This could include anything from a prison sentence to fines. Corruption is strictly prohibited in all countries in which Leverage operates, and any violations of such are therefore not in the “beneficial interest of the company.” This continues to apply to all employees, regardless of their nationality.

腐败扭曲的商业世界竞争，对个人和社会造成损害。腐败还可能导致 LVG 员工以及 LVG 的法律责任，包括监禁，罚款。所有 LVG 经营的场所都严格禁止腐败，任何违反此类规定的行为都不符合“公司的利益”。这适用于所有员工，无

论其国籍。

5. Produce full, fair, accurate, timely and understandable disclosure in reports and documents that the Company or its subsidiaries file with.

在报告和文件中提供完整，公正，准确，及时和易于理解的信息。

6. Promptly report any possible violation of this Code to the Company's ISC Committee.

及时向公司的公正性委员会反应任何可能违反本准则的行为。

禁止员工直接或间接采取任何欺诈性地行动影响，胁迫，操纵或误导公司或其子公司的独立审核员，对公司及/或其子公司的财务产生误导。

Covered Employees understand that they will be held accountable for their adherence to this Code. Failure to observe the terms of this Code may result in disciplinary action, up to and including termination of employment. Violations of this Code may also constitute violations of law and may result in civil and criminal penalties to the Covered Employee, his or her supervisor(s) and/or the Company.

员工应对遵守本准则负责。不遵守本准则的条款可能会导致纪律处分，包括解雇。违反本准则也可能构成违法行为，并可能导致员工，其主管或公司受到民事和刑事处罚。

If you have any questions regarding the best course of action in a particular situation, you should promptly contact the ISC Committee. You may choose to remain anonymous by reporting any possible violation of this Code by sending a letter to the ISC Committee. If you are uncomfortable contacting the ISC Committee, and/or if you wish to express concerns relating to questionable accounting or related matters, you may report such concerns to the president of the ISC Committee or General Manager.

如果您对特定情况下的最佳行为方案有任何疑问，您应该立即联系公司的公正性委员会。您可以匿名向ISC委员会发信来报告任何可能违反本准则的行为。如果您不方便联系ISC委员会，或您希望表达有关可疑财务或相关事宜的疑虑，您可以向ISC委员会主席或总经理报告此类问题。

It is the Company's policy to encourage the communication of bona fide concerns relating to the lawful and ethical conduct of business, including accounting, internal control and auditing matters. It is also the Company's policy to protect those who communicate bona fide concerns from any retaliation or discrimination for such reporting, and no retribution or discrimination against any individual who communicates bona fide concerns will be permitted.

鼓励善意沟通是公司的政策，涉及合法和道德的商业行为，包括会计，内部控制和审核事宜。保护人也是公司的政策，通过任何报复或歧视来传达真正的担忧报告，并且不允许对任何传达真正关注的个人进行报复或歧视。