



Upholding Leopard Imaging's Ethics Bottom-line

- A Letter from Leopard Imaging Co-CEO

Dear Colleagues,

From Day One of Leopard Imaging's establishment, we have put down our value of integrity and ethical behavior as the critical foundation of Leopard Imaging's survival and growth. We sincerely believe that the highest ethical standards, honesty, and fairness will be the best protection and competitive edge for Leopard Imaging to achieve its ambition of becoming a better, bigger, and stronger intelligent vision solutions company. To gain and preserve the trust of all stakeholders and uphold Leopard Imaging Values of "Intelligent Vision Solutions for a Better World.", every one of us must work together to behave ethically in order to achieve the right results with the right approach. The Leopard Imaging's Code of Conduct is the guide to the behaviors and principles of business conduct that we all expect from each of our employees – no matter our roles, positions, or where we are located. As the Co-CEO of Leopard Imaging, We strongly advise you all to carefully read and understand our Code and refer to it for guidance when in doubt. Each and every one of us has the duty to perform our jobs in an open, honest, and ethical manner even when it is not to our advantage.

Making the right judgment also entails speaking up if you have concerns or suspect any activity that violates our Code of Conduct or the law. At Leopard Imaging, we will not tolerate retaliation against anyone who reports concerns in good faith.

Please remember, YOUR actions matter. You set the examples in maintaining the highest professional business standards and leading others in doing the same. By living with integrity and embracing the principles of our Code, we each help create an enterprise that our customers want to do business with and a great place to work.

Hope everyone will do his/her part and make Leopard Imaging better tomorrow than today!

Sincerely,

Bill Pu and Leon Luo
Co-CEO
September 6, 2022



Leopard Imaging Code of Conduct

Scope and General Principles

The Leopard Imaging Code of Conduct (“Code”) applies to all Board members (when applicable), officers, and employees of Leopard Imaging, including all its subsidiaries. Throughout this document, references to Leopard Imaging apply to all of these entities.

Everyone’s Responsibility

During the course of normal business, we will be faced with situations where the right answer may not be obvious. The Code can guide us, but it cannot address every circumstance. Our responsibility in all instances is to act with integrity, avoiding even the appearance of improper behavior. We must abide by all applicable laws, live our values, and when in doubt, ask for guidance.

Responsibilities of Supervisors and Leaders

Actions speak louder than words, and we hold our leaders to a higher standard. Supervisors are expected to model appropriate behavior, ensure that employees have the resources they need to conduct business ethically, encourage open discussion and be responsive to any concerns.

Speak Up

We measure commitment to our values by how we treat each other. As employees, we have an obligation to behave in a way that protects our business interests, our reputation and each other. This includes acting to promptly report any conduct inconsistent with the Code, our values, or the law – even if we have only a reasonable suspicion that something is not right. All reports of misconduct are taken seriously and will be treated confidentially, consistent with a full and fair inquiry.

No Retaliation

We respect those who raise concerns about misconduct or potential misconduct, and we will not tolerate retaliation against anyone who reports a potential violation in good faith or who participates truthfully in an investigation.



Leopard Imaging Eight Codes of Conduct

Code 1 Health and safety in the workplace

We maintain a safe and healthy work environment and are committed to eliminating work-related injuries and illnesses. We are committed to the safety, health, and security of all of us, our operations and all those who come into contact with us.

- We all share the responsibility to make safety and health a daily priority.
- We will take corrective action in a timely manner when we become aware of an unsafe or hazardous situation.
- We are expected to work free from the influence of any substance that could affect judgment or safety on the job.
- We will not tolerate substance abuse in the workplace. We do not permit the use, possession or sale of illegal drugs, controlled substances (including misuse of prescription drugs) or drug paraphernalia on Leopard Imaging premises, in Leopard Imaging vehicles or while conducting Leopard Imaging business.
- We do not permit the use or possession of alcohol in Leopard Imaging vehicles or on Leopard Imaging premises, except for certain on-site social events where permission has been given in advance. Leopard Imaging also reserves the right to conduct drug and alcohol testing as permitted by local law. Smoking is only allowed in dedicated areas and strictly prohibited in Leopard Imaging labs and offices.
- All Leopard Imaging employees are required to abide by any Health and Safety notices issued by HR throughout the year.
- Tidiness and cleanliness of work areas and eating areas within Leopard Imaging premises directly affect health and safety of all employees. (Other than the regular janitorial cleaning), all Leopard Imaging employees are responsible for:
 - i. keeping their work area tidy and clean at all times
 - ii. Cleaning up after themselves in eating areas
 - iii. Following the signage and rules posted in common areas regarding Health & Safety.

Code 2 Workplace Behavior

Encouraged Behavior

We foster a work environment in which all employees and other individuals in the Leopard Imaging Inc. workplace are treated with decency and respect. Accordingly, we expect and require all individuals working on behalf of Leopard Imaging Inc. or present in a Leopard Imaging Inc. workplace to follow these principles:

- Communicate in a manner that is conducive to effective working relationships.
- Work with others to create an environment in which all are inspired to interact through mutual respect, support, and appreciation of difference.
- Carry out all assigned responsibilities to the best of your abilities and in accordance with Leopard Imaging Inc. policies.
- Comply with all applicable local, state, and federal laws and regulations.
- Create an environment of mutual respect, integrity and honesty.



Unacceptable behavior will not be tolerated. This includes, but is not limited to:

- Using abusive language, bullying, or intimidating fellow employees, conference attendees, visitors or other individuals in the workplace and at Leopard Imaging events.
- Physically threatening remarks (written or verbal).
- Engaging in aggressive or hostile acts such as assaulting, aggressively using profanity, throwing objects at another person, fighting, or intentionally damaging another person's property.
- Any form of sexual harassment, bullying and mobbing behavior. This includes any aggressive, abusive, intimidating, or violent behavior that may create a hostile work environment.
- Engaging in conduct (or making statements) that is degrading, offensive, humiliating, or intimidating to others. Seemingly innocent actions can create an environment that may be offensive or unwelcome, and we should be alert to our own behavior and the effect on others.
- Behaving in a way that makes others uncomfortable.
- Engaging in any behavior that is disruptive to another employee(s).
- Knowingly making false representations about your work or your credentials, or about another employee, lab member, contractor, vendor, visitor or other individual in the workplace.

Any violations of this policy by Leopard Imaging Inc. employees are grounds for disciplinary action, up to and including termination of employment. A violation of this policy by individuals who are not Leopard Imaging Inc. employees at Leopard Imaging Inc. workplaces or on Leopard Imaging Inc. premises is cause for appropriate action in response, including but not limited to removal from Leopard Imaging premises or termination of any existing contractual relationship.

Code 3 Inclusion and diversity, equal opportunity, and respect in the workplace

Inclusion and diversity are essential elements of Leopard Imaging corporate strategy. In a culture where inclusion and diversity are at the forefront, each of us can contribute and feel we are valued. Bringing our whole selves to work each day enables us to not only deliver more value, but also have a more fulfilling career.

- We provide equal employment opportunities to all employees and applicants regardless of age, race, color, national origin, sex, sexual orientation, gender identity or expression, disability, religion, or any other factor protected by applicable law.
- Hiring, promotion, compensation and other employment-related decisions are based only on job-related factors.
- We recognize and respect all applicable labor and employment laws including those addressing freedom of association, privacy, and equal employment opportunity at wherever we operate.
- We do not use forced or involuntary labor.
- We comply with all applicable child labor laws and laws against human trafficking.



Code 4 Avoiding Conflicts of Interest with Leopard Imaging

We are expected to avoid situations where personal interests conflict, or appear to conflict, with Leopard Imaging's best interests. This includes any activity that interferes with our ability to perform our roles objectively or may cause others to doubt our fairness. If there is a chance that a situation might be perceived as a conflict of interest, we should discuss with a supervisor or Human Resources. We are all expected to comply with Company-required steps to mitigate or resolve conflicts of interest.

Common conflict of interest situations include:

- a) Having a financial interest in a company that does business with Leopard Imaging.
- b) Receiving compensation or other incentives from a company that does business with Leopard Imaging.
- c) Holding another job that interferes with Leopard Imaging job.
- d) Hiring a supplier, distributor or other agent managed or owned by a relative or close friend.
- e) Being in a reporting relationship (directly or indirectly) with a romantic relationship partner.

Conflicts of interest can take many forms. Not every potential conflict of interest can be described and addressed in the Code. It is essential for each of us to use good judgment and seek guidance when unsure.

- We should avoid investments or other financial interests that could interfere, or appear to interfere, with our ability to make decisions in the best interest of Leopard Imaging. We must not:
 - a) Hold a financial interest in any Leopard Imaging customer, supplier, distributor or agent if we are in a position to affect Leopard Imaging's business relationship with them.
 - b) Take any opportunity for business or profit that belongs to Leopard Imaging or compete with the Company in any way.
 - c) In general, we may work outside of Leopard Imaging in any lawful occupation if these other duties are performed outside of normal working hours and do not interfere with our ability to perform our Leopard Imaging job. However, we must not:
 - d) Be employed by, or receive any compensation from, a Leopard Imaging customer, supplier, distributor, or agent if we are in a position to affect Leopard Imaging's business with them.
 - e) Be employed by, or receive any compensation from, any competitor of Leopard Imaging.
 - f) Serve as an officer or director of any for-profit company outside of Leopard Imaging without first seeking approval from Leopard Imaging.
- If we are invited to speak at a conference due to our status as a Leopard Imaging employee or to expertise related to our Leopard Imaging job responsibilities, we cannot accept compensation for the speaking engagement.



- If we have relatives or friends who already have or would like to have business relationships with Leopard Imaging, our customers, suppliers, distributors, agents, or competitors, we must disclose to our supervisor and Human Resources any situation in which:
 - a) A relative or close friend has a financial interest in, or works for, a Leopard Imaging customer, supplier, distributor, or agent if we are in a position to affect Leopard Imaging's business with them.
 - b) An immediate family member is employed by a competitor of Leopard Imaging.
 - c) We are put in a position where we directly or indirectly hire, supervise, or otherwise have authority over a relative or romantic partner.

Code 5 No Bribery and Corruption

We are committed to maintaining the highest ethical and legal standards in our relationships around the world. This includes our relationships with governments, government officials and other businesses. We do not participate in or tolerate bribery or corruption in any form. A bribe is giving or offering something of value to someone to improperly influence a decision. We do not offer, promise, or give anything of value to a government official, or to anyone else, in order to gain a business advantage. Nor may we accept bribes from others.

- Interactions with government officials are subject to complex legal rules. The law establishes severe penalties for bribery and corruption, including large fines and imprisonment. Even a simple gift given to a government official can raise suspicions of corruption.
- To avoid even the appearance of improper conduct, pre-approval is required for gifts or entertainment above a certain monetary threshold. It is important to obtain preapproval before offering or accepting anything of value (including gifts, meals, and entertainment) to or from a government official.
- Avoiding bribery and corruption in transactions with other businesses and private parties requires an equally vigilant commitment.
- Bribery also includes kickbacks—the giving or receiving of personal payments to influence the awarding of a contract or other business transaction.
- We must not use a third party, such as a subcontractor, consultant, or agent to pay a bribe. Both Leopard Imaging and our employees may be liable if a third party pays a bribe on our behalf, even if we did not direct the payment. We must take care when selecting agents and consultants to ensure that there is no indication that they might pay a bribe.

Code 6 Protecting Leopard Imaging information assets (including intellectual property)

We all have an obligation to protect Leopard Imaging resources and use them properly. Examples of Leopard Imaging information assets include: Company proprietary information; computers, electronic networks, and other office equipment; telephone and mobile communications devices; internet access and email; Computer provided social media



platforms such as Facebook, Twitter, etc. These resources are intended for Leopard Imaging business use. In certain situations, personal use of computers, telephones, mobile communications devices, internet access, and email may be acceptable on a limited basis if we follow Company IT policies and do not generate additional costs. We are expected to:

- Use our Company resources legally and responsibly.
- Safeguard Leopard Imaging resources from theft, waste, and unauthorized access and use.
- Not use Company funds or other resources to support an outside business or unauthorized activity.
- We must protect our intellectual property against theft, misuse, and loss. It is important that we take appropriate steps to protect intellectual property for Leopard Imaging inventions, proprietary information, trademarks, trade secrets and copyrighted materials. These steps include, but are not limited to:
 - a) Following Company guidelines for use of the Leopard Imaging brand and trademarks, including the Leopard Imaging logo.
 - b) Reporting any concerns about Leopard Imaging intellectual property that is infringed, misused, or misappropriated.
 - c) Filing timely patent applications on Leopard Imaging inventions strategic to Leopard Imaging businesses.
 - d) Respecting the intellectual property of other parties, including their trade secrets, copyrights, trademarks, patent rights and proprietary information, by avoiding unlawful use or infringement.
 - e) Protecting Leopard Imaging proprietary information, and not disclosing it to persons outside of Leopard Imaging without authorization.
- We rely heavily on computer systems and telecommunications networks; therefore, we must protect those systems from misuse and unauthorized access. We will:
 - a) Follow the Leopard Imaging IT policies, security and data protection requirements.
 - b) Use and protect passwords for computer or network access and refrain from sharing passwords or user IDs.
 - c) Store sensitive, proprietary or highly confidential information in protected files on secure servers provided by the Company.
 - d) Store and secure information, including printed material, based on its information classification.
 - e) Always safeguard all electronic devices.
 - f) Protect information security controls.
 - g) Protect Company equipment or systems from pornography, gambling, and illegal or other offensive or inappropriate purposes.
- We are all responsible for maintaining the integrity of Leopard Imaging information and for using it appropriately. Unauthorized disclosure of Leopard Imaging information could harm the Company, the privacy of other employees or customers, or give an unfair advantage to others. This means we will:
 - a) Report loss of any Leopard Imaging information in a timely manner.



- b) Observe all contractual obligations to safeguard others' information, and do not disclose the proprietary or personal information of others.
- c) Limit access to sensitive, proprietary, or highly confidential information.
- d) Do not discuss Leopard Imaging information where the conversation may be overheard or compromised.
- e) Comply with any applicable internal or external privacy statement or policy.
- f) If it is necessary to share proprietary information outside the Company, we should consult with company leaders first to ensure that adequate protections, such as a confidentiality agreement, are in place.
- g) Examples of Leopard Imaging proprietary information include: research and development (R&D) information, trade secrets, personnel records, business plans and proposals, capacity and production information, marketing or sales forecasts and strategies, client and customer lists and personal information, pricing lists or strategies, and supplier data.
- h) We must obtain appropriate approval for external presentations that contain Leopard Imaging information. Even after leaving Leopard Imaging, we have a continuing obligation to protect the Company's proprietary information.
- We respect the privacy of individuals and protect their personal data. Examples of "personal data" include: address, age, employment, and educational and training information. Some examples of "sensitive personal data" include: medical information, financial account numbers, personal identification numbers, race, religion, sexual orientation, criminal convictions, and political affiliations. We will take, but not limited to, the following measures:
 - a) Handle personal data responsibly and in accordance with Leopard Imaging data protection/privacy policy, and any contractual obligations and local laws.
 - b) Use personal data only for legitimate business purposes.
 - c) Are open and transparent about the purposes for which we use personal data.
 - d) Protect personal data from unauthorized disclosure.
 - e) Limit disclosure of sensitive personal data to those who are under professional obligations of confidentiality and who are trained in the proper handling of this kind of information.
- Social networks and other forms of social media are becoming part of the business mainstream. In general, the rules that apply to new communication tools are consistent with traditional communication rules. We will take, but not limited to, the following measures:
 - a) Clearly distinguish between authorized business communication and personal communication. If we give a personal opinion on public issues, we must not create the impression that we represent Leopard Imaging or are expressing the views of Leopard Imaging.
 - b) Respect trademark, copyright, fair use, trade secret and financial disclosure laws and Company guidelines and policies with proper authorization.
 - c) Adhere to Leopard Imaging's values in all authorized business communications.



- d) Do not speak on behalf of Leopard Imaging unless we are a designated spokesperson and have permission to do so.
- e) Do not disclose any confidential information belonging to Leopard Imaging, its employees, customers, suppliers and/or other business partners.
- f) Do not refer to Leopard Imaging customers, suppliers, or business partners without their approval.
- g) Do not endorse Leopard Imaging products or services without prior approval.
- h) Do not divulge personal data about others, especially personal data obtained as part of our Leopard Imaging business relationships.

Code 7 Competition, antitrust and fair trade

Our responsibility to conduct business ethically extends to our relationships with customers, shareholders, suppliers, competitors, and regulators. This means competing within appropriate legal boundaries and based on price, quality, and service. We win business ethically and obey all antitrust and trade laws, which demand free and fair competition.

- We do not have discussions or reach agreements with competitors or others that may restrict open competition. This includes conversations with competitors about:
 - a) Prices or credit terms
 - b) Submission of bids or offers.
 - c) Allocation of markets or customers, or division of territories.
 - d) Restrictions on production or distribution.
 - e) Boycotts of suppliers or customers.
- We do not engage in any unfair, misleading, or deceptive trade practices.
- We advertise, promote, and label our products and services in a factual, honest, and informative way.
- Information about our competitors enables us to better understand market demands and improve our products and services, but we must always gather competitive data legally and ethically. To obtain competitive intelligence, we will use publicly available information, including published articles, market analyses and purchased reports. This means:
 - a) We will not seek a competitor's confidential information, or accept anyone else's confidential information, without their consent.
 - b) We will never use illegal or unethical means (e.g., theft, bribery, misrepresentation, or espionage) to obtain competitive information.
 - c) We will comply with all applicable laws when gathering competitive information.

Code 8 Business and Financial Records

Business and financial records are essential to Leopard Imaging's success. The integrity and accuracy of these records help internal decision-making and are the basis of our reporting to shareholders, investors, creditors, government agencies and other stakeholders. We must:

- Keep and present all Company records and reports in accordance with the law, our internal control policies, and generally accepted accounting principles (GAAP). These



records include accounting records as well as any other electronic or written records, such as expense reports, time sheets, medical claim forms, personnel records and reviews and the wide variety of analytical, engineering, and technical reports generated by the Company.

- Establish and maintain a system of strong and effective internal controls.
- Ensure that all Company records accurately and fairly reflect the underlying transaction.
- Never falsify any document.
- Record all financial transactions in the proper account, department, and accounting period.
- Ensure that all actions and commitments are in accordance with Leopard Imaging's Authorization Policy and Delegation of Authority (will be established).
- Validate that all public communications, including reports to government authorities, are full, fair, accurate, timely, and understandable.
- Raise any concerns about the accuracy of Leopard Imaging records with finance management or through another appropriate channel.

Code 9 Corporate Citizenship

At Leopard Imaging, we conduct our business with the recognition that we all live together on a planet with limited resources. Making the most of the resources we have and accelerating progress on efficient and renewable solutions are not only a strategic imperative, they are ingrained in our values. Everything we do and how we do it matters.

- Setting the standard for sustainability: we are all part of a complex system that requires balance, innovation, and an uncompromising focus on protecting our planet. Our commitment to each other and to environmental stewardship requires us to:
 - a) Comply with environmental laws and Leopard Imaging policies applicable to our area of business.
 - b) Ensure that our products, operations, and behaviors always adhere to Leopard Imaging environmental standards and approved compliance plans.
- We are committed to making positive change through community partnerships, charitable giving, and volunteerism.
- We support initiatives that address the goals and needs of the community and seek to leverage our capabilities to support those communities.
- We participate in a variety of charitable endeavors ranging from financial contributions to donations of materials, services and other resources including employee volunteers to make positive impact to the communities we do business.
- Leopard Imaging encourages participation in local, national, and international political processes. When expressing personal views in a public forum, employees are not authorized to use Company letterhead or Company email or to reference any business address or job title.
- We strive to communicate with the public in an accurate and consistent way. To be sure that we comply with the law and protect our interests, only those who are



specifically designated to do so should represent Leopard Imaging to the public or media.

Administration and Implementation of the Code

We are committed to maintaining an environment where compliance with the law and this Code is expected. This expectation begins with each employee and extends to our customers, suppliers, business partners, shareholders, and regulators.

Investigation and Response

Leopard Imaging takes seriously and fully investigates all known potential legal or Code violations. Investigations are conducted in a way that is respectful, confidential, and fair. If the investigation substantiates an allegation, an appropriate management team will review the findings and determine the outcome. The Company will protect anyone who raises a concern in good faith. It is a violation of the Code to knowingly make a false accusation, lie to an investigator, interfere with, or refuse to cooperate in an investigation. Everyone who is part of Leopard Imaging's workforce is expected to be truthful and fully cooperate in any investigation.

Annual Acknowledgment Certification

We are all required to annually acknowledge that we have read the Code and agree to abide by it. During this process, we are also required to truthfully disclose to the Company any existing or potential conflict of interests. Failure to read or acknowledge the Code does not excuse us from compliance with the Code.

Other Provisions

The Code is Leopard Imaging's guide to Company policies and legal requirements that govern how we conduct business around the world. It is a general reference for all employees everywhere we do business. It does not describe all applicable laws or Company policies or give full details on any individual law or policy. Leopard Imaging reserves the right to modify, revise, or alter any policy, procedure, or condition related to employment at its sole discretion and at any time without notice and without revision of the Code. The contents of the Code do not constitute the terms of a contract of employment, and nothing contained herein should be construed as a guarantee of continued employment. The Code is not a legal document and is intended for informational use only. The information herein can be changed or revoked unilaterally by the Company at any time and is not all-inclusive.