

Level Legal Code of Conduct, Ethics, and Compliance Policy

Our Core Values

Level Legal is committed to conducting business in accordance with the highest standards of honesty, integrity, and fair dealing. In one way or another, the concepts of integrity, ethics, honesty, and commitment contained in this Code of Conduct, Ethics, and Compliance Policy (the “Code of Conduct”) are included in our Core Values and currently exist in our company culture.

Give a Damn

Give a Damn is best demonstrated by a conscientious spirit of service to customers, co-workers and Level Legal. It means that the person is engaged and willing to go above and beyond that which is required. It also means that sometimes work is done for which there is no immediate, identifiable, or specific reward. You recognize that what you’re working toward is greater than any one person or project. It means demonstrating appropriate and positive ownership of the tasks you’re responsible for, and taking pride in the work done by you and the team you’re working with. It means committing to completing work to the best of your ability. Finally, it is exhibited by active learning and improvement.

Get It Done Right

Get It Done Right describes the value which manifests itself in hard work, and in seeking to contribute and assist co-workers and customers in any way possible, even if not specifically requested. This includes a measure of intuition, and means that tasks are completed timely, with diligence, and an attention to detail. An important component of this value is collaboration – working together in a positive, constructive, and efficient way.

Show Respect

A respectful colleague is proactive and aggressive in advancing the company’s interest while trusting others to do their jobs. This includes being patient, fair, generous, and open-minded. This embodies a spirit of cooperation—recognizing that we are supportive and helpful for each other. It also includes being a good steward of resources and facilities.

Delight Others

The desire to Delight Others is at the heart of every interaction, both with colleagues and customers. It includes anticipating and following through on all that can be done for others—and more than is expected—in thoughtful ways that let people know you are on their side.

This Code of Conduct is not intended to replace good judgment and common sense but serves as a guide and minimum standard of conduct. The purpose of this Code of Conduct is to provide basic guidelines for situations in which ethical issues arise. In these situations, before you act, stop and think.

A good test is this: *If your parents knew about it, your customer knew about it, our CEO knew about it, and the newspapers and the media knew about it, would you be proud of your behavior, or would you be even slightly embarrassed?*

If it's the latter, don't do it.

Level Legal does not knowingly support any public or private organization which espouses discriminatory policies or practices. Level Legal expects all of its employees to perform their work with honesty, truthfulness, and integrity, and to comply with all applicable laws. Each employee and non-employee director of Level Legal is, and will be held, responsible for the observance of this Code of Conduct. If any employee has questions, they should contact their immediate manager or the Chief People Officer.

If an employee becomes aware that another employee has violated this Code of Conduct, they are obligated to report it in accordance with procedures set forth below. No one has the authority to retaliate against an employee who reports a possible violation. Failure to comply with any of the provisions of this Code of Conduct subjects the employee to disciplinary measures up to and including termination.

Policies and Practices

Conflicts of Interest

A conflict of interest may arise in any situation in which an employee's loyalties are divided between business interests that, to some degree, are incompatible with the interests of Level Legal. Level Legal strives to create an environment that protects our customers, supplier, and employees from such conflicts. Level Legal expects that no employee will place themselves in a position that would have the appearance of being, or could be construed to be, in conflict with the interests of Level Legal.

Gifts and Entertainment. We avoid giving gifts of any material monetary value to customers or potential customers. It doesn't feel right, and it can get us in trouble. In short, just don't do this.

From time to time we do give branded items and holiday gifts of minimal real value. These must be coordinated through our Vice President of Marketing.

We also don't accept gifts of any material monetary value from anyone seeking business of any kind from Level Legal.

Normal business entertainment such as lunch, dinner, theater, a sporting event, and similar entertainment, is appropriate if of a reasonable nature and in the course of a meeting or another occasion, the purpose of which is to hold bona fide business discussions or to foster better business relations. All such entertainment should be reported and approved in advance, if practical. No employee may accept tickets or invitations to entertainment when the prospective host will not be present at the event with the employee.

Bribery, Kickback and Fraud. We do not accept or receive anything that looks, sounds, feels, or could ever be interpreted as a bribe or kickback.

There are additional limitations with respect to governmental employees. While you may think that there would not be a problem with taking a government employee out to dinner, sending a gift, providing theater tickets, or paying for a round of golf, there may be. The giving of gifts to government employees, even gifts of low value, is highly regulated and in many cases prohibited. Please consult with the Chief People Officer before providing or paying for any meals, refreshments, travel or lodging expenses, or giving anything of value to any local, federal, state, or foreign government employee.

Any employee found to be receiving, accepting, or condoning a bribe, kickback, or other unlawful payment, or attempting to initiate such activities, will be subject to termination and possible criminal proceedings against them. Any employee found to be attempting fraud or engaging in fraud will be subject to termination and possible criminal proceedings against them. All employees have a responsibility to report any actual or attempted bribery, kickback, or fraud to Level Legal.

Interests in Other Businesses or Relationships. It is critically important in our industry to identify and avoid any conflicts of interest, whether actual or apparent. A conflict of interest exists when your private interests interfere in any way or competes with Level Legal's interests or have the appearance of conflict.

Unless approved in advance by an employee's supervisor, neither an employee nor their spouse, domestic partner, or any other member of the employee's immediate family may directly or indirectly have a financial interest (whether as an investor, lender, employee, or other service provider) in a competitor, or in a customer or supplier if that employee or their subordinates deal directly or indirectly with that customer or supplier in the course of their job at Level Legal. It is critically important in maintaining our integrity that nobody at Level Legal, whether an employee or contractor, be influenced or affected by interests or relationships that conflict with Level Legal's best interests.

International Operations. Laws and customs vary throughout the world, but all employees must uphold the integrity of Level Legal in other nations as diligently as they would in the United States. When conducting business in other countries, it is imperative that employees be sensitive to foreign legal requirements and United States laws that apply to foreign operations, including the Foreign Corrupt Practices Act. The Foreign Corrupt Practices Act generally makes it unlawful to give anything of value to foreign government officials, foreign political parties, party officials, or candidates for public office for the purposes of obtaining, or retaining, business for Level Legal.

Corporate Opportunities. Level Legal employees and contractors are prohibited from taking for themselves opportunities that are discovered through the use of corporate property, information, or position without the consent of the CEO. No Level Legal employee or contractor may use company property, information, or position for improper personal gain and no employee may compete with Level Legal directly or indirectly. Level Legal employees and contractors owe a duty to Level Legal to advance its legitimate interests whenever possible.

Each employee or contractor must promptly report to their manager or the Chief People Officer all actual or apparent conflicts of interest. Level Legal's CEO is responsible for the interpretation and application of this Code of Conduct to particular situations and will recommend an appropriate resolution of the conflict.

Use of Company Property and Information

Confidential Information. Confidential information includes all non-public information about Level Legal, our customers, and our employees that, if disclosed, might be of use to competitors or harmful to us or our customers. This could range from information about the work we are

doing for specific customers, to the status and performance of customer personnel, or even to Level Legal's strategic plans.

Confidential information about Level Legal and its operations belongs to Level Legal. Confidential information includes all non-public information about Level Legal, our customers, and our employees that, if disclosed, might be of use to competitors or harmful to us or our customers. Every employee should be aware that in any competitive environment, proprietary information, and trade secrets must be safeguarded in the same way that all other important Company assets are protected. You must not, without proper authority, give or release to anyone not employed by Level Legal, or to another employee who does not need to know, data or information of a confidential nature. This information must not be used in any way other than as required in performing employment duties. All files, records, and reports acquired or created in the course of employment are the property of Level Legal. Originals or copies of such documents may be removed from the Level Legal offices for the sole purpose of performing the employee's duties to Level Legal and must be returned at any time upon request.

Each manager is responsible for controlling the disclosure and use of confidential information by employees under their direction. Additional restrictions on use of confidential information are more fully set forth in the Confidentiality Agreement each person signed upon accepting employment with Level Legal.

Privacy and Data Protection. Level Legal respects and is diligent in protecting the privacy of our employees, contractors, and customers, and will comply with applicable Data Privacy and Protection laws.

Company Property and Facilities. Company property, facilities, or physical resources may not be used for solicitation or distribution activities which are not related to an employee's services to Level Legal, except for charitable activities that have been approved in advance by Level Legal.

Trademarks, Service Marks, and Copyrights. No employee may negotiate or enter into any agreement respecting Level Legal's trademarks, service marks, or logos without first consulting the Vice President of Marketing.

Similarly, using the trademark or service mark of another company, even one with whom our Company has a business relationship, always requires clearance or approval by the Vice President of Marketing to ensure that the use of that company's mark is proper. Employees must avoid the unauthorized use of copyrighted materials of others and should confer with the Chief People Officer if they have any questions regarding the permissibility of photocopying, excerpting, electronically copying, or otherwise using copyrighted materials.

Antitrust Laws. It is our policy and your responsibility to comply with federal and state antitrust laws. Price fixing, customer and market allocations, bid rigging, and other arrangements with competitors that are unlawful must be avoided, and you may never exchange sensitive business information with competitors. Unless information is publicly available, you should in general avoid discussing the following subjects with any competitor: Prices, terms, or conditions of sale; credit terms, discounts, profits, profit margins, or costs; market segment shares; distribution practices; bids on contracts; sales territories; selections, rejections, or terminations of customers; or any other matters where an agreement with a competitor would be inconsistent with the complete freedom of action of Level Legal in the conduct of our business.

This Code of Conduct is not intended as a comprehensive review of the antitrust laws and is not a substitute for expert advice. If any employee has questions concerning a specific situation, they should contact the Chief People Officer before taking action. If you are unsure whether a contemplated action might violate any of the antitrust laws, you must review it with the Chief People Officer prior to implementation.

Political Contributions. You may not, without the approval of the Chief People Officer, use any Level Legal funds for political contributions of any kind to any political candidate or holder of any national, state, or local government office. You may make legal personal contributions, but you may not represent that you're making any such contribution on Level Legal's behalf.

Insider Trading Policy. Federal and state laws prohibit trading in securities by persons who have material information that is not generally known or available to the public. Level Legal employees and contractors may not trade in stock or other securities while in possession of material nonpublic information, pass on material nonpublic information to others without express authorization by Level Legal, or recommend to others that they trade in stock or other securities based on material nonpublic information. Employees who have questions pertaining to the sale

or purchase of a security under circumstances that might involve confidential information or securities laws should consult with the Chief People Officer.

Record Keeping and Accounting Practices. Level Legal has adopted controls in accordance with internal needs and the requirements of applicable laws and regulations. These established accounting practices and procedures must be followed to assure the complete and accurate recording of all transactions. All staff, within their areas of responsibility, are expected to adhere to these procedures, as directed by appropriate Level Legal officers. Any accounting adjustments that materially depart from GAAP must be approved by the Company's accounting team and reported to the Company's independent auditors.

No employee or non-employee director may interfere with or seek to improperly influence, directly or indirectly, the auditing of Level Legal's financial records.

Violation of these provisions shall result in disciplinary action, up to and including termination, and may also subject the violator to substantial civil and criminal liability. If an employee becomes aware of any improper transaction or accounting practice concerning the resources of the Company, they should report the matter immediately to their supervisor or to the Chief People Officer of Level Legal. You may also raise your concern through one of the options set out in this Code of Conduct. There will be no retaliation against employees who disclose questionable accounting or auditing matters.

Timely and Truthful Disclosure. In reports and documents filed with or submitted to any regulators by Level Legal, and in other public communications made by Level Legal, Level Legal employees and contractors involved in the preparation of such reports and documents shall make disclosures that are full, fair, accurate, timely, and understandable. Level Legal employees and contractors shall not knowingly conceal or falsify information, misrepresent material facts, or omit material facts necessary to avoid misleading Level Legal's independent public auditors or investors.

Employment Policies. Level Legal is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices, including harassment. Therefore, we expect that all relationships among persons in the workplace will be professional and free of bias, prejudice, and harassment.

In compliance with local, state, and federal law, Level Legal ensures equal employment opportunity without discrimination or harassment on the basis of race, color, national origin, religion, sex (with or without sexual conduct), age, disability, alienage or citizenship status, marital status, creed, genetic predisposition or carrier status, sexual orientation, or any other characteristic protected by law. This protection extends to unlawful discrimination or harassment on the basis of an employee's association with another person. Level Legal prohibits and will not tolerate any such discrimination or harassment.

Interpretation. The CEO of Level Legal has the exclusive responsibility for the final interpretation of the Code of Conduct. The Code of Conduct may be revised, changed, or amended at any time by the CEO of Level Legal.

Reporting Suspected Non-Compliance. Level Legal will promptly investigate all reports of alleged non-compliance with this Code of Conduct and other alleged improprieties and determine an appropriate course of action. Retaliation in any form against an individual who reports a violation of this Code of Conduct or of law, even if the report is mistaken, or who assists in the investigation of a reported violation, is itself a serious violation of this policy. Acts of retaliation should be reported immediately and will be disciplined appropriately.

Disciplinary Action. Level Legal will take appropriate action against any employee or contractor whose actions are found to violate this Code of Conduct. Disciplinary actions may include the immediate termination of employment. If Level Legal has suffered a loss, it may pursue its remedies against the individuals or entities responsible as permitted by law. If laws have been violated, Level Legal will cooperate fully with the appropriate authorities. All Level Legal employees and contractors are expected to fully cooperate in internal or external investigations of misconduct.

Waivers and Amendments. Any waiver of any provision of this Code of Conduct may only be granted by the CEO. Amendments to this Code of Conduct must be approved by the CEO.