

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re 360 DigiTech, Inc. Securities Litigation

No. 1:21-cv-06013-AKH

**CONSOLIDATED CLASS ACTION
COMPLAINT FOR VIOLATION OF
THE FEDERAL SECURITIES
LAWS**

JURY TRIAL DEMANDED

CLASS ACTION

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Court-appointed Lead Plaintiff Gad Sorek (“Lead Plaintiff”), individually and on behalf of all persons and entities who or which, during the period from April 30, 2020 through July 8, 2021, inclusive (the “Class Period”), purchased the publicly traded American Depositary Shares (“ADSs”) of 360 DigiTech, Inc. (“360 DigiTech” or the “Company”) and were damaged thereby (the “Class”)¹, bring this Consolidated Class Action Complaint for Violation of the Federal Securities Laws against Defendants 360 DigiTech, several of 360 DigiTech’s senior executives— Chief Executive Officer (“CEO”) Haisheng Wu, former Chief Financial Officer (“CFO”) and Chief Strategy Officer (“CSO”) Jiang Wu, current CFO Zuoli “Alex” Xu, and Chairman of the Board of Directors and controlling shareholder Hongyi Zhou (collectively, the “Individual Defendants”).

Lead Plaintiff’s claims are brought upon personal knowledge as to his own acts, and upon information and belief as to all other matters, based upon, among other things, a review and analysis of: (1) reports and documents filed by 360 DigiTech with the Securities and Exchange Commission; (2) reports issued by analysts covering or concerning 360 DigiTech and its business; (3) press releases, news articles, transcripts, videos, and other public statements issued by or about 360 DigiTech, its business, and the Individual Defendants; (4) an investigation conducted by Lead Plaintiff’s attorneys, including interviews with former 360 DigiTech employees; and (5) other publicly available information concerning 360 DigiTech, its business, and the allegations contained herein. Lead Plaintiff believes that substantial additional evidentiary support exists for the allegations herein and will continue to be revealed after Lead Plaintiff has a reasonable

¹ Excluded from the Class are: (i) Defendants; (ii) members of the immediate family of any Defendant who is an individual; (iii) any person who was an officer or director of 360 DigiTech during the Class Period; (iv) any firm, trust, corporation, or other entity in which any Defendant has or had a controlling interest; (v) 360 DigiTech’s employee retirement and benefit plan(s) and their participants or beneficiaries, to the extent they made purchases through such plan(s); and (vi) the legal representatives, affiliates, heirs, successors-in-interest, or assigns of any such excluded person.

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