



Code of Ethics

1. INTRODUCTION

The creation and dissemination of the values on which a certification body bases its ability to be a competitive player in its business sector and a responsible entity in the social context in which it operates, are the necessary elements to build a corporate culture suitable for achieving the objectives that the Entity sets itself:

- the certification of skills, products and services in compliance with predefined regulations and best practices in the sector, also in areas not yet coded.
- the use of innovative technologies, such as blockchain and artificial intelligence, which guarantee independent checks, data immutability and maximum stability and transparency of certification processes and register management, ensuring and instilling trust in stakeholders.

With this in mind, Lighthouse Worldwide Certification (LHWC) has deemed it appropriate to define and formalize this Code of Ethics as a compendium of the rules, values and guiding principles adopted and to which a positive value is recognized.

It is believed, in fact, that in order to achieve the ambitious objectives, it is essential that the subjects operating in LHWC and all those who enter into any relationship with it, comply with the rules of conduct that inspire the work of the institution.

The Code must guide the entrepreneurial and daily work of the entity in its entirety, in the belief that the achievement of the objectives cannot be separated from ethics and absolute respect for the law in the conduction of business activities. To avoid damage to the image, good name, reputation and institutional, economic and commercial relationships of the certification body, even in the face of ambiguous or potentially risky situations, the Code of Ethics must represent a guide, the knowledge and application of which are essential and dutiful.

All subjects in senior positions, such as directors, persons with management functions, as well as all employees, collaborators, consultants, members of committees and more generally all third parties who enter into a relationship with the Entity must put in question the respect for fundamental principles such as honesty, moral integrity, correctness, transparency and objectivity in the pursuit of social goals.

The certification body by providing adequate information, prevention and control tools - ensures the transparency of conduct, intervening, where necessary, to suppress any violations of the Code and to monitor the effective observance of the Code itself.

2. RECIPIENTS

The recipients of this Code of Ethics with the obligation to respect its contents are detailed below.

Internal subjects:

- the President and those who hold or perform de facto functions of representation, administration, management or control within the Entity;
- the employees of the entity.
- External parties:
 - all subjects who operate on behalf or in the interest of the Entity;
 - external professionals, collaborators, consultants, committee members and in
 - in general, individuals who carry out self-employment activities;
 - suppliers.

The aforementioned external parties, insofar as they are in commercial and working relationships with the entity, will be required to comply with the ethical values and principles of behaviour expressed in this Code of Ethics and, should individual or corporate conduct and actions contrast the values and principles of the entity, and / or laws or regulations, all appropriate initiatives will be taken to interrupt and resolve the existing relationship.

It is the duty of internal subjects who entertain, in particular but not exclusively commercial relations, with external subjects to inform them about the obligations imposed by the Code of Ethics, to demand compliance with them and to adopt suitable initiatives in case of non-fulfilment.

The recipients who hold the position of manager also have the obligation to exercise a supervisory activity by paying the utmost attention and diligence towards all the other recipients in relation to whom they have a direct and indirect hierarchical superiority.

They must also report any irregularities, violations or non-compliance with the principles contained in this Code of Ethics in the manner specified below.

Compliance with the ethical values and the related application principles of behaviour, illustrated in this Code of Ethics, by the Recipients, both internal and external, represents a contractual obligation as described in the sanction system.

3. VALUES

In achieving its objectives, LHWC is inspired by the following values, binding for the Recipients of this Code of Ethics:

a. Legality

The Entity undertakes to conduct its business in compliance with national and international regulations in the countries where applicable, rejecting any form of illegal practice even in the forms of conduct that can directly or indirectly integrate forms of collaboration with criminal associations.

The President, the directors and in general the employees and collaborators of the entity, as part of their professional activity, are required to diligently comply with current legislation, this Code of Ethics, procedures, technical regulations and any other form of internal regulation.

The pursuit of an interest of the entity cannot be considered, in any case, an exemption from non-compliance with the law, nor can it justify dishonest conduct.

b. Honesty, moral integrity and fairness

In carrying out activities and in relations of any type and nature, all those who work with and for the Body are required to diligently comply with current laws and regulations, as well as the Code of Ethics.

They must behave with respect for the fundamental principles of honesty, moral integrity, correctness, transparency, objectivity and respect in the pursuit of objectives and in all relationships with internal and external persons and entities.

In no case will an action that differs from an honest line of conduct be justified. Therefore, the entity will not undertake or continue any type of relationship with anyone who adopts behaviour that differs from what is established in this specific point of the Code of Ethics.

c. Transparency

Transparency represents an indispensable principle in all relations that the Recipients have with their interlocutors, committing themselves to always provide accurate, objective, truthful, timely and unambiguous information.

Those who are entrusted with the task of keeping accounting records are required to carry out each registration in an accurate, complete, truthful and transparent manner and to allow any checks by persons, including external ones, in charge of this.

Accounting records must be based on accurate and verifiable information and must fully comply with internal accounting procedures.

Each writing must allow the relative operation to be reconstructed and must be accompanied by adequate documentation.

All actions concerning the business activity must result from adequate records that allow for checks and controls on the decision, authorization and execution process.

Recipients who, for any reason, become aware of omissions, falsifications, negligence of the accounting or of the documentation on which the accounting records are based, are required to report the facts to their superior and notify the Safeguarding Committee. Impartiality.

d. Confidentiality

The entity ensures the confidentiality of the information and personal data being processed and the protection of the information acquired in relation to the activity carried out; also requires that the information obtained is not used for its own interests in order to derive undue profit from it or

in ways that are contrary to the law or in a way that could damage the rights, assets or objectives of the Entity.

Recipients are also prohibited from using confidential information for purposes not related to the exercise of their professional activity and in any case in violation of the applicable rules.

e. Impartiality and equal opportunities

Any form of discrimination is prohibited and in particular any discrimination based on race, nationality, sex, age, disability, sexual orientation, personal or social condition, political or trade union opinions, philosophical orientations or religious beliefs towards any person inside or outside the entity.

f. Environmental protection

The environment is a primary asset that the entity undertakes to safeguard, planning activities through the search for a balance between economic initiatives and environmental needs, trying to develop the business with the utmost respect for current environmental regulations and always taking into account the rights of future generations. The institution supports the use of the best available technologies, trying to find solutions with a lower environmental impact in terms of choice of resources, distribution, use and management of vehicles.

All recipients of the Code are required to always evaluate and manage the environmental aspects with great attention in a preventive manner and actively intervene to avoid incorrect environmental situations and behaviours.

g. Safety, protection of health and working conditions

The entity ensures the protection of safety, hygiene and health in the workplace and considers it fundamental and a priority, in carrying out its activities, to fully respect the health, physical integrity and rights of workers with strict observance of all the prescriptions dictated by the current legislation on safety, hygiene and health at work.

Anyone among the recipients who should detect situations of prejudice to health and safety in the workplace or become aware of situations and / or facts that may harm or prejudice the respect of the aforementioned rights, is required to immediately report the matter to both their superior and the Committee for the Safeguarding of Impartiality.

h. Professionalism and improvement of human resources

The institution recognizes the centrality of human resources and, to this end, is committed to enhancing the skills of its resources, providing them with suitable training, professional updating and development tools.

i. Culture of risk

The Entity intends to increase in its employees a sensitivity to the risks underlying their daily operations. This awareness must transpire from the concrete behaviours of each one. There must

be a widespread perception of how the internal control system actually monitors these risks without damaging overlaps or guilty gaps.

j. Protection of personal data

In compliance with current legislation (EU Regulation no. 679/2016), the entity is committed to the protection of the personal data of each of its employees, customers and suppliers.

4. GENERAL PRINCIPLES OF BEHAVIOUR

In carrying out company activities, the recipients of this Code of Ethics must comply with the following principles of conduct, in application of the ethical values set out above.

In no case can the pursuit of the interest or advantage of the entity justify conduct contrary to the ethical values set out above and, in particular, not compliant with the law.

4.1 Policies for the selection of personnel and collaborators

Human resources are an indispensable element for the existence of the institution and a critical factor for successfully competing on the market. Honesty, loyalty, ability, professionalism, seriousness, technical preparation and dedication of personnel are therefore among the decisive conditions for achieving the objectives and represent the characteristics required by LHWC to its directors, employees and collaborators at various title.

In order to contribute to the development of the objectives and ensure that they are pursued by all in compliance with the ethical principles and values which inspire LHWC, the company policy is aimed at selecting each employee, consultant, collaborator in various capacities according to the values and characteristics listed above. As part of the selection, the institution works to ensure that the resources acquired correspond to the profiles actually necessary for business needs, avoiding favouritism and facilitations of any kind.

4.2 Prevention of Conflicts of Interest

In conducting any activity, each person involved must avoid any conflict between his personal, social, financial or political interest and the advancement of the business interests of LHWC or its customers. The occurrence of situations of conflict of interest, in addition to being in contrast with the law and the principles set out in the Code of Ethics, is detrimental to the image and integrity of the entity.

Administrators, employees and collaborators must therefore exclude any possibility of exploiting their position or overlap between economic activities of personal and / or family interest and the duties they cover within the body.

Employees who believe they may be in conflict must inform their superior or the human resources personnel manager so that the entity can decide whether such a conflict actually exists.

4.3 Duties of employees and collaborators

LHWC promotes respect for company staff, striving to ensure that the work is carried out in a peaceful environment, in which it operates in compliance with the laws, regulations and corporate rules, balanced with the principles of the Code of Ethics.

Dignity and respect for employees and collaborators, both in the private and professional spheres, means first of all the protection of the physical and moral integrity of the individual and its enhancement for the achievement of social objectives.

The institution also promotes the establishment of an internal climate of civil coexistence in which everyone interacts with other colleagues honestly, with dignity and mutual respect. Furthermore, LHWC does not allow and actively opposes any form of discrimination based on the diversity of race, language, nationality, ethnicity, faith or religion, political opinion, sexual orientation, age, marital status, physical aspects, disability, economic and social conditions.

Merit, competence and efficiency are the main criteria for evaluating the work of the people involved, in their respective roles and functions, to achieve the goals of the organization.

All personnel must be hired with a regular employment contract, in accordance with the provisions of the law, as no form of irregular or non-compliant work is tolerated.

All behaviours of physical and moral violence, or hostile and intimidating attitudes attributable to bullying practices, are prohibited, without any exclusion.

In any case, it is forbidden to engage in conduct aimed at isolating, discriminating or harassing individual workers, including through unjustified interference with others' work performance or prevarication for reasons of personal competitiveness.

Each employee and collaborator is required to act loyally in order to comply with the obligations signed in the employment contract and the provisions of this Code of Ethics, ensuring the required services.

To this end, all personnel are required to work diligently to protect company assets, through responsible behaviour and in line with the operating procedures set up to regulate their use.

Each employee and collaborator of the Entity is responsible for the protection of the material and financial resources entrusted to him and has the duty to promptly inform the units in charge of any risks or harmful events.

All personnel must comply with the provisions of company policies regarding information security to guarantee its integrity, confidentiality and availability, and process their documents using clear, objective and exhaustive language, allowing any checks by managers or authorized external subjects.

4.4 Relations with customers

The institution considers it essential to maintain high quality standards of its services. In relations with their customers, each employee or collaborator is required to align their conduct to criteria of correctness, courtesy and availability, providing where required or necessary, exhaustive and adequate information and avoiding the use of elusive or incorrect practices or in any case aimed at undermining the independence of judgment of the interlocutor.

4.5 Relations with suppliers

LHWC applies the utmost transparency and fairness in relations with suppliers of goods and services, in compliance with the laws and regulations in force.

It is the policy of the entity, in fact, to negotiate in good faith and in a transparent way with all potential suppliers, as well as to avoid any possibility of unjustifiably partial negotiations or any logic motivated by favouritism or dictated by the certainty or the hope of obtaining advantages, also with reference to situations unrelated to the supply relationship, for oneself or for LHWC.

4.6 Relations with public authorities

In relations with the Public Administration or with entities that carry out activities of public utility or public interest, LHWC strictly complies with national and international legislation in the countries where applicable.

All recipients of this Code of Ethics are obliged to refrain:

- from offering work opportunities or any advantage to a public official involved in the relationship, to their family or to persons in any way related;
- from offering gifts or benefits to the aforementioned subjects, including through third parties, except in the case of a courtesy act of modest value;
- from promising or having promised other forms of benefit or advantage;
- from improperly influencing, including through third parties, the decisions of the institution
- interested;
- from creating advantageous situations in favour of the public official involved in the relationship, their family or subjects in any way related, by means of simulated operations.

In the event that the entity is a party in civil, criminal or administrative litigation proceedings, including of an out-of-court nature, the corporate bodies, employees and consultants must not in any way adopt any behaviour that could lead to measures that are illegitimately to the advantage of the same.

In relations with the judicial authorities, all employees must offer the widest cooperation, making truthful statements. Any form of reticence, silence and falsehood is contrary to the interests of the entity since LHWC intends to act in full compliance with the law.

4.7 Relations with political and trade union organizations

LHWC does not directly or indirectly favour or discriminate against any political organization or trade union. The body refrains from making any direct or indirect contribution, in any form, to political parties, movements, committees and political and trade union organizations, their representatives and candidates, except those due under specific legal provisions.

4.8 Conferment of professional assignments

The collaborators in any capacity and the consultants of the entity are required, in the execution of the contractual relationship established or the assignment received by the same, to behave with correctness, good faith and loyalty, respecting, as applicable to them, the provisions of this Code of ethics, technical regulations and instructions and prescriptions given to LHWC staff.

LHWC proceeds with the identification and selection of collaborators and consultants with absolute impartiality, autonomy and independence of judgment without accepting any conditioning or compromise of any kind aimed at achieving or obtaining favours or advantages. In this context, the entity considers only professional competence, reputation, independence, organizational capacity, correctness and timely execution of contractual obligations and assigned tasks as requirements.

4.9 Alteration of IT systems and copyright protection

It is forbidden to alter in any way the functioning of a computer or telematic system or to illegally intervene in any way on the data, information and programs contained therein or pertinent to it, in order to obtain an unfair profit with damage to others. The prohibition is strengthened if this results in a false representation of the data provided to the Public Administration and it is the State or a Public Body that is damaged.

Full compliance with the laws relating to the protection of copyright, which protect intellectual property rights, is also provided.

4.10 Use of company resources and contributions and loans received

Each recipient is responsible for the protection and conservation of the corporate resources entrusted to him for the performance of his duties, as well as for their use in a proper and compliant manner for corporate purposes and the corporate procedures governing their use.

In particular, each recipient must:

- operate diligently in the use of company resources entrusted to him;
- avoid improper use of company resources that may be the cause of offenses,
- damage or reduction of efficiency, or in any case contrary to the interests of the Entity;

- strictly comply with the company procedures governing its use and the applicable reference legislation, particularly that relating to the software or,
- in general, the protection of intellectual property;
- to base the use of resources on the highest levels of safety, decorum and respect for
- sensitivity of others.

In particular, the LHWC prohibits any use of company resources that may represent a violation of the laws in force, as well as an offense to the freedom, integrity and dignity of persons, especially minors.

Any use of company resources that could cause undue intrusions or damage to the computer systems of others is also prohibited.

It is forbidden to use contributions, loans, or other disbursements, however named, granted to LHWC by the State or by a Public Body, for purposes other than those for which they were granted.

4.11 Prevention of money laundering

Money laundering, or the process by which sums, goods or other benefits resulting from non-culpable crimes are transformed in such a way as to be regularly acquired, hindering the identification of their illicit origin, is prohibited by law and is contrary to values and the LHWC Code of Ethics which is committed to full compliance with anti-money laundering legislation.

All recipients and subjects in general who enter into commercial relations with LHWC are therefore required to comply with the anti-money laundering legislation.

Any conduct by third parties in commercial relations with the entity that may arouse suspicion or appear in conflict with the aforementioned legislation must be immediately reported to the Committee for the Safeguarding of Impartiality. Furthermore, LHWC censors and fights any form of organized crime and to this end the Recipients are required to pay particular attention to the requirements of moral integrity and reliability of the commercial counterparts.

4.12 Preparation of the balance sheet and financial situations and economic results of the Entity

LHWC strives to maintain a reliable administrative-accounting system in order to prepare accurate and complete economic and financial data for a clear, truthful and correct representation of management facts. In addition, the Entity is committed to the establishment and use of suitable tools to identify, prevent and manage risks of any kind, fraud and misconduct.

4.13 Gifts, benefits and promises of favours

LHWC prohibits all those who operate in their own interest, in their own name or on their own behalf, from accepting, offering or promising, directly or indirectly, money, gifts, goods, services,

benefits or favours that are not due (including in terms of employment opportunities). unrelated to the normal relations of courtesy between the parties.

In any case, the amounts of any gifts or gadgets must not exceed the value of 150 CHF. If the indicated value is exceeded, the authorization of the President is required.

5. MONITORING AND CONTROL OF THE APPLICATION OF THE CODE OF ETHICS

LHWC undertakes to respect and enforce the rules of the Code of Ethics also through the Committee for the Safeguarding of Impartiality.

The Committee for the Safeguarding of Impartiality is assigned tasks and powers of monitoring and control on the implementation of the rules of ethical behaviour, through, in particular:

- constant supervision of the application by the recipients of the rules of the Code of Ethics;
- the promotion and evaluation of all reports and suggestions aimed at improving the Code of Ethics;
- the promotion of communication, training and updating programs for all recipients;
- opinions on the revision of the Code of Ethics or on the most relevant company policies and procedures, so that they are consistent with the Code itself.

In order to allow the effective application of the Code of Ethics, all recipients have the right to report to the Committee for the Safeguarding of Impartiality alleged cases of violation of the values and related behavioural principles outlined in this Code of Ethics of which they become aware , or to report any potentially critical attitude or situation.

To facilitate reporting of conduct, even potentially, contrary to the principles of the Code of Ethics, LHWC has activated the mailbox amministrazione@lhwc.ch, in favour of the Committee for the Safeguarding of Impartiality specifically intended for this.

This e-mail box is open to all recipients and to other stakeholders for reporting any violations of the Code of Ethics.

The Committee for the Safeguarding of Impartiality acts in such a way as to ensure that the authors of the reports are not subject to any forms of retaliation, discrimination or penalization or any consequence deriving from them, ensuring the confidentiality of their identity, without prejudice to the obligations of law and the protection of the rights of the entity or of persons accused in bad faith.

In particular, the following requirements apply:

- information and reports of any violation or suspicion of violation of the principles enshrined in the Code of Ethics, must be made in writing and in a non-anonymous form;
- any anonymous reports will be taken into consideration for further investigation only if they are detailed and, therefore, contain all the objective elements necessary for the subsequent verification phase; anonymous reports deemed unreliable will not be taken into consideration;

- the information and reports must be sent by the interested party directly to the Committee for the Safeguarding of Impartiality.

The Committee for the Safeguarding of Impartiality evaluates the reports received, deciding whether to take specific actions.

All recipients are required to collaborate with the Committee for the Safeguarding of Impartiality, in order to allow the collection of all further information deemed necessary for a correct and complete evaluation of the reports received.

In the face of the reports, the facts will be evaluated, possibly also listening to the author of the same and the presumed responsible for the possible violation.

The Committee for the Safeguarding of Impartiality may make use of specific units or subjects with competence on the specific matter for the analysis and evaluation of conduct which are integral to violations of the Code of Ethics and the provisions of the law.

6. SANCTIONING SYSTEM

In the event of an ascertained violation of the Code of Ethics, the Committee for the Safeguarding of Impartiality reports the report and requests the application of any sanctions deemed necessary by the President and / or the Board of Directors. In the event that such violations concern the President or one or more members of the Board of Directors, the Committee for the Safeguarding of Impartiality will report the reports and the disciplinary sanction proposal for information to the Board of Directors, for all the relevant determinations.

The competent functions, activated by the aforementioned bodies, approve the measures, including sanctions, to be adopted in accordance with the regulations in force, ensure their implementation and report the outcome to the Committee for the Safeguarding of Impartiality. If the sanction proposed by the Committee for the Safeguarding of Impartiality is not imposed, adequate reasons will be given.

Violation of the principles set out in the Code of Ethics compromises the trust relationship between the entity and its directors, employees, consultants, collaborators in various capacities, suppliers, partners. Such violations will therefore be pursued by LHWC incisively, promptly and immediately, through the adoption of appropriate disciplinary measures by the Committee for the Safeguarding of Impartiality, in an appropriate and proportional manner to the violation committed.

Failure to comply with and / or violation of the rules of conduct indicated in the Code by the directors or employees of the entity constitutes a breach of the obligations arising from the employment relationship and gives rise to the application of disciplinary sanctions. The sanctions that can be imposed will be applied in compliance with the provisions of the law and any applicable National Collective Labour Agreement.

Any behaviour by collaborators, consultants or other third parties connected to the entity by a contractual relationship not of employment in violation of the provisions of the Code of Ethics, may also lead, in the most serious cases, to the termination of the contractual relationship, without prejudice to any claim for compensation if damage to LHWC derives from such behaviour and this also regardless of the termination of the contractual relationship.

June 2020