



LIGHTHOUSE
Lab Services

CODE OF BUSINESS CONDUCT AND ETHICS

Making Quality Lab Testing More Accessible



Date: February 2023

Real Guidance Through Compliance

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Letter to our Lighthouse Team

Dear Team,

I am pleased to present the Lighthouse Lab Services Code of Business Conduct and Ethics. I am so proud of the amazing work our Company does each day in our mission to *Make Quality Lab Testing More Accessible*. Our mission guides us in providing sophisticated client service while holding ourselves to the highest standards of excellence.

In everything that we do, it is critical that we operate with a strong sense of ethics and integrity. This Code is an important part of our commitment to quality and provides us with the guidance and tools we need to deliver our services accordingly.

As experts in our highly regulated industry, living up to our values helps us succeed in our mission and inspires trust from those we serve. We should be proud not just of what we do, but how we do it.

Each one of us is a deeply valued member of our team, and we should hold each other to these standards and embrace our mutual obligations to always act in an ethical manner. In everything we do, we should ask ourselves this question, “am I doing what’s right?” If something doesn’t seem right, say something. If you are unsure about how to proceed in a situation, ask questions.

In short, compliance with this Code demonstrates our commitment to quality, and is a core part of who we are and what we do.

Now, as always, thank you for your dedication to our mission and your commitment to serve our clients with integrity and ethics.

My very best regards,

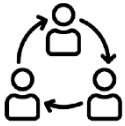


Mark Roth
CEO

Our Values

“When your values are clear to you, making decisions becomes easier.” - Roy E. Disney

Collaboration



Value Statement: Value Statement: At Lighthouse, we value INNOVATION. We think creatively to find solutions when challenges arise. We encourage our teams to be curious, expand their knowledge, and apply their expertise in creative ways to deliver valuable client services. We support the growth and development of our employees so that they are always prepared with ideas and techniques on the cutting edge of the laboratory industry.

Impact Statement: We achieve more together.

Quality



Value Statement: At Lighthouse, we value QUALITY. We bring a strong sense of integrity and ethics to everything we do. Our decisions and actions are measured by whether they help our clients deliver consistent, accurate, and dependable laboratory results to patients and providers and promote improved outcomes and better value to the healthcare system. We are proud not just of what we do, but how we do it.

Impact Statement: Pride in what we do and how we do it.

Community



Value Statement: At Lighthouse, we value COMMUNITY. We seek to make a positive impact on all of those whom our work may touch, including providers, patients, and payors across healthcare, our internal teams, and our communities. By bringing quality laboratory testing closer to the point of care, we are helping clients create more accessible healthcare for local populations. We work to improve the world around us and encourage our employees to find ways to give back. We strive to cultivate an inclusive environment that allows employees to bring their authentic, whole selves to our workplace and community. We value the relationships we share and recognize that our diverse backgrounds make us a stronger community.

Impact Statement: Working to improve the world around us.

Innovation



Value Statement: At Lighthouse, we value INNOVATION. We think creatively to find solutions when challenges arise. We encourage our teams to be curious, expand their knowledge, and apply their expertise in creative ways to deliver valuable client services. We support the growth and development of our employees so that they are always prepared with ideas and techniques on the cutting edge of the laboratory industry.

Impact Statement: Think creatively. Encourage Curiosity.

Code of Business Conduct & Ethics (“Code”)

Introduction

At Lighthouse Lab Services integrity and ethics are a core part of who we are and what we do in *Making Quality Lab Testing More Accessible*. In support of this mission, we are excited to offer *Real Guidance Through Compliance*. We hold ourselves to the highest level of professional and ethical standards, and in doing so, have built a reputation for honesty, integrity, and quality. Your compliance with the policies established by this Code demonstrates your commitment to our mission and allows us the opportunity to live up to our name as a beacon in our industry, offering *Real Guidance Through Compliance*.

Real Guidance Through Compliance
[LighthouseLabServices.com/Ethics
andCompliance](https://LighthouseLabServices.com/EthicsandCompliance)

Who does this Code apply to?

This Code applies to all Lighthouse employees, officers, directors, vendors, and contractors, including consultants who conduct business on Lighthouse’s behalf (“you,” “we,” “us”). We must all read, understand, and follow this Code, along with our other policies and procedures. We are a team, and each of us is responsible for compliance.

What is expected of us?

Our mission is *Making Quality Lab Testing More Accessible*. In performing our mission, we strive to provide the highest quality of services to meet our clients’ needs, thus improving patient care and adding value to the healthcare industry as a whole. Quality and compliance are core components of this mission and help us to help our clients.

Commit to Ethics and Integrity.

We ask that every Lighthouse team member share our ethical commitment. While we do not expect each of you to become an expert in the laws governing our business, we do expect you to adhere to our ethical standards set forth in this Code, and to be mindful of the laws that apply to our business.

When in Doubt, Ask.

Whenever any uncertainty regarding laws or ethical standards arises, if you are unsure what to do or are uncomfortable in a situation, ask questions. If you do not feel comfortable raising the issue with your supervisor, there are a number of resources provided in this Code, including our anonymous reporting hotline, Red Flag Reporting (see page 8 for more information).

Strive to Do What Is Right.

At Lighthouse, we believe that the best work comes from a collaborative, professional relationship with our colleagues and clients. We each agree to engage in this relationship in good faith and to conduct ourselves in accordance with the highest standards of ethics and in full compliance with all applicable laws and regulations. We strive to do what is right, even when things are not clear. This



goal can only be attained and maintained through our own actions. We must each exercise good judgment. Your compliance with this Code demonstrates such judgment as well as competence and is an important element in the evaluation of an employee for promotion. Correspondingly, insensitivity to or disregard for the principles of this Code will be grounds for appropriate disciplinary or corrective actions.

Comply with the Law.

We expect everyone at Lighthouse and all of our clients to obey all applicable laws and regulations, as well as all company codes, policies, procedures, and directives. We must obey not only the letter, but also the spirit of the law.

Do not Retaliate Against Anyone Reporting a Concern.

Lighthouse prohibits retaliation of any form (whether by a supervisor, coworker, or anyone else) against someone who has made a good faith report of a concern or suspected violation of this Code, company policy, or applicable law or regulation.

How this Code Works

This Code is designed to promote integrity and ethical conduct; address compliance with governmental laws, rules, and regulations; promote the well-being of Lighthouse, its team members, and the community; and encourage fair, accurate, and timely communication of concerns or violations.

This Code provides general obligations with respect to certain laws that directly affect the way we do business, such as those covering the provision, marketing and sale of laboratory consulting and management services, the production and sale of laboratory supplies and materials, recruiting and staffing services, and those governing our relationships with our teammates, clients, business partners, and competitors.

This Code is not comprehensive, and our commitment is to comply with all applicable laws and regulations. Consequently, where a particular law or regulation imposes standards that are stricter than the ones contained in this Code, we intend to follow the stricter standards. You are also required to adhere to other sources of company policy, such as the Employee Handbook, laboratory standard operating procedures, HIPAA policies, and their agreements with Lighthouse. Violation of these policies could subject Lighthouse, including the individuals involved, to criminal or civil actions, fines, and lawsuits for damages. Also, violation of these policies could subject you to corrective action up to and including termination of employment or other relationship with Lighthouse.

You can obtain advice about this Code and all other corporate codes and policies from your immediate supervisor or from a member of the Legal and Compliance Department, Human Resources, or senior leadership. Please remember, if you are unsure of a situation, ask questions.

What do I do if I have a question or concern?

For this Code to work best, it is important for you to ask questions and voice concerns. We expect you to approach members of management about ethics or compliance without any fear of retaliation. We must all take it as a personal responsibility to do what is right and avoid violations of this Code or applicable law. Because we cannot predict every scenario that may arise, it is important to use the following as a guide when new questions or concerns arise.

- Use good judgment. If something seems illegal or unethical, do not do it. If something makes you feel uncomfortable, do not do it.
- Discuss the issue with your supervisor. This is a core process for all situations. In many cases, your supervisor will be more knowledgeable about the question and will appreciate being brought into your decision-making process. Ask questions.
- Seek help. In the event you are uncomfortable approaching your supervisor with your questions or if you have done so but still have a concern, you can raise it with the Legal and Compliance Department, Human Resources, or through Red Flag Reporting, our anonymous reporting hotline.

Ask Questions. If you are unsure about something, ask your supervisor, ask any of the executive leadership team, or ask anonymously through Red Flag Reporting.

What do I do if I know about a violation of the Code?

If you believe a violation of any laws, rules, regulations, or this Code has occurred, you must promptly report the violation. When in doubt about the best course of action in a particular situation, you should report the concern. Failure to report a potential violation could lead to corrective action depending on the circumstances.

How do I report a violation?

You may report a suspected violation or other concern via the following methods:

- Speak with your **supervisor** or **manager**;
- Contact the **Legal and Compliance Department** via legal@lighthouselabservices.com;
- Speak with anyone on the **executive management team**;
- **Anonymously report** to Lighthouse's compliance hotline by following these instructions:
 - To file an anonymous report, simply do one of the following using client code **LLS**:
 - Visit www.RedFlagReporting.com and click on "File a Report"
 - Call **1-877-647-3335**
 - Text **RFR** to **234-231-9005**
 - Email to redflag@redflagreporting.com

Any supervisor or manager who receives a report of violation or potential violation of this Code or law must report it immediately to the Chief Compliance Officer. Complaints made related to laboratory quality will be forwarded to the Chief Quality Officer.



Violations and Disclosure

Nothing in this Code prohibits or restricts the Company from taking any disciplinary action in connection with any matter pertaining to employee conduct, whether or not it is expressly discussed in the Code. This Code is not intended to create any expressed or implied contract with any employee or third party. In particular, nothing in this document creates any employment contract between the Company and its employees.

Compliance and Ethics Obligations

Maintain Confidentiality

You must maintain the confidentiality of information entrusted to you by the Lighthouse or our clients, except when disclosure is authorized. Confidential information includes all non-public information that might be of use to competitors, or harmful to the company or its customers, if disclosed. If you are not certain that particular information is not confidential, treat it as confidential.

Only certain officers and personnel are authorized to communicate with the news media, government agencies, or other third parties on behalf of Lighthouse. Such requirements are addressed below.

In addition, as a healthcare company, patient information may be required to complete work or projects. Recording, managing, and transmitting patient specific medical information should be carried out in accordance with The Health Insurance Portability and Accountability Act of 1996 (HIPAA), privacy laws, and local data protection/privacy rules, paying particular attention to local rules regarding obtaining patient consent for sharing patient medical information.

Protecting the confidentiality of patient-specific medical information is an important obligation of all those involved in the healthcare industry. You should never disclose patient-specific information or patient health information to any unauthorized persons, inside or outside of Lighthouse, who do not have a legal right to this information, and should only access, maintain, and utilize patient health information within authorized systems. Care should be taken regarding this principle when patient-specific medical information is electronically transmitted. If you become aware of a violation, you must report immediately via Red Flag Reporting or legal@lighthouselabservices.com. HIPAA and other laws require Lighthouse to report and notify certain individuals whose unsecured patient-specific information or personal health information has been, or is reasonably believed to have been accessed, acquired, used, or disclosed. If you suspect there may have been a breach, report it.

Preserve the Company's Assets

We each should protect Lighthouse's assets and ensure their efficient use. Theft, carelessness, and waste have a direct impact on our profitability. All of our assets should be used for legitimate business purposes and care should be given to preserve them.



Safeguard the Company's Proprietary Information

In addition to preserving and not misusing the tangible assets and resources of our company, we each must also protect Lighthouse's intellectual property. Such property includes scientific and technical knowledge, know-how, and the experience developed in the course of the company's activities, including information we develop in research, production, marketing, sales, legal, and finance. Such information is a vital asset essential to our continued success.

This information is highly confidential. It should be protected by all of us and not disclosed to outsiders. Its loss through inadvertent or improper disclosure could be harmful to us as a company. We, as employees, are required to sign agreements reminding us of our obligation not to disclose our company's confidential information, both while we are employed and after we leave the company.

Your loyalty, integrity, and sound judgment both on and off the job are essential to the protection of our proprietary information. If you become aware at any time and by any means, that proprietary information has been lost or otherwise compromised, you must immediately report the breach to the Legal and Compliance Department so that appropriate action may be taken to protect Lighthouse.

Cultivate Good Employee Relations

We seek to establish and maintain our reputation as an outstanding employer and to ensure high levels of employee motivation and commitment. It is our policy to treat applicants and employees without regard to race, color, religion, sex, sexual orientation, age, national origin, handicap, or veteran status; to provide challenging opportunities for individual growth and advancement; to ensure open communication throughout the organization in order to resolve problems or complaints; to strive to protect our employees' health and safety; to provide a work environment free from harassment; and to comply with all laws relating to employees. Any violations of this policy should be reported to Human Resources or through Red Flag Reporting if you prefer to remain anonymous. All reported complaints will be confidentially investigated and resolved, to the extent possible.

Lighthouse will not tolerate sexual or discriminatory harassment, whether committed by any of our team or by employees of suppliers, contractors, or clients. If you experience sexual or discriminatory harassment, or if you believe a co-worker is experiencing such harassment, you have both a right and a duty to report it promptly via one of the many reporting resources listed in this Code.

We should all be able to work in an environment free from violence and threats of violence. We will not tolerate any act of workplace violence on our property by any individual. If you are aware of a workplace violence incident or a potential threat, you must immediately report such acts or situations.

Individual managers and supervisory personnel have direct responsibility for implementing this policy. However, the support of all of Lighthouse is essential to this policy's successful implementation.



Maintain High Standards of Quality

As a diversified healthcare consulting firm, a commitment to quality is essential to the us. Lighthouse is dedicated to the development, production, and delivery of high-quality products and services meeting both our own quality standards, as well as our clients' requirements. Where applicable, we comply with the rules of the Clinical Laboratory Improvement Amendments (CLIA) and adhere to other regulatory and professional association requirements for clinical laboratory testing.

CLIA governs the conduct of clinical laboratories.
Clinical Laboratory Improvement Amendments (CLIA) | CDC

It is central to our success and ethics that we ensure the integrity of laboratory data, services, and results to clients. Each of us is responsible for adhering to applicable policies as well as laboratory standard operating procedures, and complying with all laws, regulations, and standards governing laboratory processes. In addition, all of our products and services must be manufactured, performed, or delivered in accordance with laws, including good manufacturing and laboratory practices, as well as other applicable standards. Lighthouse complies with all applicable device laws, regulations, and standards, including the United States Food, Drug, and Cosmetic Act and FDA standards for Good Laboratory Practices and Good Manufacturing Practices, where applicable.

To ensure compliance with these policies, we have implemented quality control and testing procedures. All team members are responsible for maintaining the high quality of Lighthouse's products and services.

Each of us must bring to our supervisor's attention any lapse in quality control or testing procedures. If you are not satisfied with the actions taken, you should file an anonymous report with Red Flag Reporting.

Maintain Accurate Business Communications

All business records and communications, including e-mails and messages sent through messaging applications such as Slack or Teams, should be clear, truthful, and accurate. Always keep in mind that such business records and communications may become public through litigation, government investigations, and the media.

You are required to take care to avoid exaggeration, colorful language, guesswork, legal conclusions, and derogatory remarks or characterizations of people, Lighthouse, and other companies. This applies to communications of all kinds, including e-mail and "informal" notes or memos.

Ensure Compliance with Anti-Kickback, Antitrust and Bribery Laws

The federal Anti-Kickback Statute and similar state statutes prohibit individuals and organizations from knowingly or willfully offering or paying, directly or indirectly, any form of remuneration, thing of value, or benefit to induce or reward referrals of items or services paid by Medicare, Medicaid, or any other federal or state health care benefits program.

Remuneration is another word for offering or paying something of value which can be cash or in kind, such as services, gifts, entertainment, referrals of business, technology, educational grants,

below-market rents, or charitable contributions to a health care provider with the intent to influence the referral of items or services paid by public health care programs.

If even one reason for the financial arrangement, payment, or offer to pay, is to induce or reward a health care provider for patient referrals, or for items or services paid by a public healthcare program, then the transaction or financial arrangement violates the Anti-Kickback Statute and potentially similar state statutes.

The Anti-Kickback Statute is a criminal offense with penalties including fines, imprisonment, and exclusion from federal programs. Any claims submitted for treatment, items, or services provided in violation of the Anti-Kickback Statute may form the basis for a False Claims Act case brought against individuals involved in the arrangement.

[Federal Anti-kickback Statute | Office of Inspector General | Government Oversight | U.S. Department of Health and Human Services \(hhs.gov\)](#)

We do not engage in business or financial arrangements in violation of the Anti- Kickback Statute. Because we provide technical services and supplies to healthcare providers (such as physicians and hospitals), our business dealings must be conducted in accordance with federal and state laws, including the Anti-Kickback Statute that prohibit the provision of anything of value to induce or reward patient referrals or the order or purchase of products that may be paid for by federal health care programs such as Medicare and Medicaid. Business dealings with health care providers must be at fair market value and negotiated at arms-length.

You are prohibited from engaging in any conduct which would encourage, direct, or incentivize patient referrals. We provide technical services for our clients, not sales and marketing. We do not enter into relationships with individuals or entities engaged in any such activities on behalf of current or prospective clients.

Additionally, our success is based on the value provided to our clients through delivery of quality products and services. It is imperative that when you meet with clients, you exercise good judgment and moderation in providing business courtesies and offer them only when appropriate and in accordance with Lighthouse's policies and reasonable and lawful customs in the marketplace.

Lighthouse strictly prohibits the offering or payment or delivery of money, fee, commission, credit, gift, gratuity, thing of value, or compensation of any kind directly or indirectly to any government or commercial customer, employee, investor, client, broker, agent, contractor, dealer or any other person or entity that has as one of its purposes the improper obtaining or rewarding of favorable treatment in a business transaction. Some examples of improper actions under this Code include, but are not limited to: (i) payments or offers of payment or any kind of remuneration, in cash or kind, to influence a decision to award or renew contracts or induce referrals; (ii) payments or offers of payments to influence a government official's decision to issue licenses or other governmental authorizations; (iii) payments or offers of payment to induce inaction by government officials; and (iv) payments or offers of payment aimed at obtaining and improper or unlawful competitive advantage.

We must not take any action or enter into any formal or informal understandings or agreements with competitors to restrain trade or undermine free and fair competition. Further, we must avoid even the appearance of such conduct. We must compete independently in the marketplace in compliance with domestic antitrust and competition laws. Questions or concerns regarding possible violations of any federal, state, or local anti-kickback or bribery laws or regulations should be directed to a member of the Legal and Compliance Department or reported anonymously through the Red Flag Reporting hotline.

Promote Compliant Relationships with Clients

At Lighthouse, we believe that the best work comes from a collaborative, professional relationship with each of our Clients. Just as we operate in accordance with this Code, we expect our Clients to abide by our Client Code of Conduct, which you can find on the Ethics and Compliance tab at lighthouselabservices.com. As such, we each agree to engage in client relationships in good faith and to conduct ourselves in accordance with the highest standards of ethical conduct and in full compliance with all applicable laws and regulations.

Client is responsible for all clinical decisions regarding laboratory operations.

Lighthouse sometimes enters into customer relationships after a customer has become dissatisfied with a competing service provider. When we displace an existing service provider, there is a risk that the previous provider could accuse us of “tortious interference” with its customer relationship. Tortious interference occurs when a person intentionally damages another party’s contractual or other business relationships. All Lighthouse team members involved in business development, sales, account management, implementation, and marketing, must be cautious not to encourage potential customers to violate their contractual obligations with existing service providers. In addition, you should not take actions that would interfere with the existing service provider’s ability to meet its own contractual obligations to the potential client.

Promote Compliance in Billing, Coding, and Utilization

Our services are intended to help our clients run quality testing operations from the moment specimens arrive at the laboratory until results are reported. We expect all clients to submit only truthful and accurate claims that are appropriately coded reflecting the services their laboratories have delivered. We require all clients to utilize their laboratories responsibly and in compliance with all laws, rules, and regulations, including but not limited to, with regards to compliant utilization and medical necessity, which are areas that are typically beyond the purview of our services.

If clients have questions relating to these issues, our practice is to recommend they adopt and adhere to compliant practices, including those provided by payor rules, as well as applicable laws and regulations. It is important that we do not provide advice or instruction as to our client’s method and manner of billing, unless particularly engaged to do so in the scope of services. If they raise questions or issues requiring interpretation of these rules, laws, or regulations, our practice is to encourage them to retain qualified legal counsel. You may contact the Legal and Compliance Department for recommendations of legal counsel, if needed.



Additional Guidance

Handling Government Investigations, Requests for Information or Facility Visits

Our policy is to provide full cooperation to government authorities while protecting the rights of Lighthouse and you. During any investigation, you must not conceal, destroy, or alter documents or lie or make misleading statements to government officials. Because investigations may involve complicated legal issues, such as determinations of attorney-client privilege, it is company policy that a member of the Legal and Compliance Department should be consulted prior to responding to any requests from a government official.

Avoiding Conflicts of Interest

Lighthouse respects your rights to manage your affairs and investments and does not wish to impinge upon your personal lives. At the same time, you should avoid situations that present a potential conflict between your interests and the interests of the company. Lighthouse values your loyalty and commitment to avoid any investment or association that interferes with the independent exercise of sound judgment in our company's best interests. Accordingly, you must be careful to avoid situations where personal interests could conflict or appear to conflict with the interests of our company. A "conflict of interest" occurs when an individual's (or their family member's) private interest, whether financial or an activity, interferes in any way - or even appears to interfere - with the interests of Lighthouse as a whole.

We each have an obligation to disclose any conflict or appearance of a conflict of interest to a member of the Legal and Compliance Department or through the Red Flag Reporting hotline. After an internal review, Lighthouse may approve a relationship or transaction that appears to be conflicting if we find that it is not harmful to the company. To be clear, however, conflicts and appearances of conflicts of interest are generally prohibited (even if they do not harm the Company) unless they have gone through this internal approval process. Note, though, that approval of one of these relationships or transactions does not constitute a waiver of any provision of this Code.

A conflict situation can arise when you have interests that may make it difficult to perform your work objectively and effectively for Lighthouse. Circumstances which could involve conflicts of interest, and which should be avoided include: personal or family financial interests in a competitor, supplier, or client; employment by a competitor in any capacity; acting as a consultant to a client outside of Lighthouse or acceptance of entertainment, gifts, payments, services or travel which have more than a nominal value from those seeking to do business with Lighthouse. You should not accept entertainment, gifts, payments, services, or travel that may reasonably be deemed by others to affect your judgment or actions in the performance of your duties.

Circumstances that may give rise to conflicts of interest are not always obvious. There can be many gray areas despite your best intentions. To avoid potentially damaging effects on both Lighthouse and you, you should promptly discuss with your immediate supervisor, or any member of the Legal and Compliance Department, any facts or circumstances that may involve, or appear to involve, a

conflict of interest. Such disclosure can assist us in resolving honest doubts as to the propriety of a particular course of conduct.

You are prohibited from (a) taking for yourself personally opportunities that are discovered through the use of company property, information, or position; (b) using company property, information, or position for personal gain; and (c) competing with Lighthouse. It is our duty to Lighthouse to advance the company's legitimate interests when the opportunity to do so arises.

Responding to Media and Public Inquiries

Lighthouse is committed to delivering accurate and reliable information to the media and other members of the public. All public disclosures, including forecasts, press releases, speeches and other communications will be honest, accurate, and timely.

No one is authorized to speak with the press without specific authorization to do so by the CEO. All requests for financial or other related information about Lighthouse or inquiries from the media or public should be referred to an officer of Lighthouse. Requests for information from regulators or the Government should be promptly referred to the Legal and Compliance Department.

Responses and Policy Against Retaliation

Lighthouse's policy is to respond promptly to all reports and to keep in strict confidence, to the extent reasonably possible, all information received, including the identity of each person reporting a possible violation. You are expected to cooperate in internal investigations of alleged misconduct. Any person involved in an investigation of possible misconduct in any capacity must not discuss or disclose any information to anyone outside of the investigation unless required by law or when seeking their own legal advice.

Lighthouse does not tolerate any kind of retaliation against employees who, in good faith and belief, raise possible violations of law, of this Code or of company policy. Retaliation against a team member for reporting a concern is prohibited and will result in corrective action, which may include and lead up to termination of the employment relationship. You should immediately contact your supervisor, Human Resources, a member of the Legal and Compliance Department, or submit an anonymous complaint through Red Flag Reporting if you believe that a co-worker is harassing or retaliating against you.

Excluded Persons

Lighthouse does not contract with or employ an individual or entity that is excluded or ineligible to participate in federal healthcare programs. Neither do we contract with or employ an individual who has been suspended or debarred from federal government contracts or has not been reinstated after a period of exclusion, suspension, debarment, or ineligibility. If you become aware of such a situation, you should immediately contact your supervisor or a member of the Legal and Compliance Department.

Compliance with the Code; Discipline.

We strive to serve the overall interests of our clients, suppliers, employees, communities, and shareholders and believe that strict compliance by everyone at Lighthouse with this Code will best

serve our interests and those of our constituencies. Accordingly, violations of this Code will not be tolerated and will result in penalties ranging from warnings and reprimands to discharges as deemed appropriate by the company. Willful disregard of criminal statutes underlying this Code may require Lighthouse to refer such violation for criminal prosecution or civil action.

Each supervisor has the responsibility for employees, including agents, consultants, and other representatives of Lighthouse under the supervisor's direction to:

1. continually stress to all team members the need for a commitment to the principles of the Code;
2. ensure that their departments operate in accordance with the highest principles of business ethics; and
3. maintain a workplace environment that encourages open communication regarding the importance of operating under these principles and to reinforce the lines of communications available to employees to resolve concerns related to the Code.

Everyone at Lighthouse is charged with the responsibility of familiarizing themselves with this Code and reporting each violation or potential violation. We strongly encourage you to work with your supervisors on matters concerning the interpretation and application of the Code and in making reports. If you feel that you may not discuss a particular situation with your supervisor, you should feel free to discuss the matter with a member of the Legal and Compliance Department, Human Resources, or with any of the executive officers at Lighthouse.

