



Values code

The Crowe values code provides the standards and expectations of ethical conduct that the firm requires as we do business, regardless of where that might be. Simply stated, it's how we live our values – doing the right things at the right time for all the right reasons. This code is a living document and applies to all personnel, regardless of their title or position. Everyone is responsible for modeling and supporting these important standards. We believe this code provides a solid foundation for building and maintaining a friendly and respectful work environment.

Personnel also should reference InCrowe policies and guidelines, which support this code, whenever applicable. Specifically, the InCrowe documentation addresses in more detail the personal and professional standards that help ensure we are compliant with applicable laws and internal processes, plus it identifies points of contacts for further assistance or consultation.

Our core ideology

Our core ideology is a combination of the firm's purpose, Building Value with Values, its core values, "We care," "We share," "We invest," and "We grow," and its WIN³ management philosophy that balances the needs of the client, the individual and the firm. This core ideology is simple and powerful. It is at the immutable center of the firm. It defines our values code. In the broadest context, building is what we do and builders are what we are. We choose to build significant and lasting value for our clients and ourselves by applying integrity and demonstrating the highest levels of professionalism in everything we do. Our results are defined by and valued for their ethical standards.

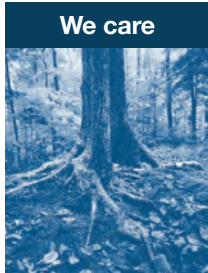
Our core purpose

Our purpose is Building Value with Values. We choose to build as a team, and we have high expectations for the significance, creative excellence and value of what we build. We build for the benefit of our end-user clients, our communities, our professions and ourselves. The act of building, in and of itself, offers each of us great intrinsic rewards. It also gives us meaning and purpose. The way we build is with integrity at all levels.



Our core values

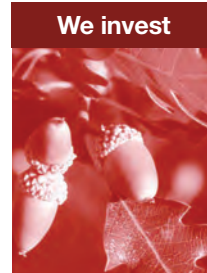
There are four core values that ground the firm: We care, We share, We invest, and We grow.



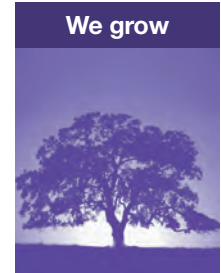
- We care for one another, our clients, our firm and our communities.
- Trust, integrity and mutual respect characterize our relationships.
- We “do the right thing” and maintain high ethical standards.
- We care deeply about the results of our efforts, and we hold ourselves personally accountable to our clients and to one another for delivering on our commitments.
- We all aspire to make a difference and to create significant value resulting from our efforts.



- We choose to work as a family, sharing responsibilities and outcomes.
- In building lasting relationships with our clients and among ourselves, we routinely provide opportunities for others to grow and develop as individuals and teams.
- Collaborating, mentoring, teaching, supporting and coaching define our relationships.
- Sharing opportunities and enjoying others’ successes are important components of how we interact.



- Investing in our people and building our resources to extend the value we bring to our clients characterizes our culture.
- Embracing change and fostering continuous learning and thought leadership are important ways we invest.
- Innovation and diversity increase our capacity for high quality and excellence.
- Our energy, resources and resourcefulness are the valuable assets we contribute.
- Our willingness to take risks and our desire for self-improvement, personal growth and financial prosperity underpin our will to maximize client success and advance the firm.



- Unity of purpose and stewardship are behind the concept of enriching and holding the firm “in trust” for the legacy of future generations.
- Over time, we seek to sustain continuous growth and profitability, to attain a higher form in our professions and to fulfill a greater purpose for our clients and our communities.
- We aim to build a better place for our people and their families to grow, and to balance their life goals and wealth-accumulation needs.
- We desire freedom to self-determine our future, and we seek long-term financial strength and value-realization to maintain our freedom in pursuing our goals.

Our management philosophy

WIN³ is the philosophy that Crowe management has chosen as its guide. This philosophy defines the manner in which the firm will function on a daily basis. While there is no universally “right” philosophy, the WIN³ philosophy is seen as the most effective and efficient means to attain our vision of a firm with strong integrity.

The WIN³ management philosophy defines success as having a thorough understanding and being responsive to the needs of the client, the individual and the firm. It submits that the best management decisions at all levels will be made when the benefits to all three of these stakeholders are maximized. In the short term, it is expected that one

or more stakeholders’ needs may take precedence, but over the longer term, success is defined as exceeding the expectations of all three stakeholders in satisfying their needs. Neither the client’s, the individual’s nor the firm’s needs are more important based on their inherent nature. There is no hierarchy among the needs of these three.

