



Supplier Code of Conduct

April 2023



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Crowe LLP (“Crowe”) is committed to the highest standards in our conduct of responsible business. Our values ground us. They drive us to act with the utmost integrity and professionalism. Our values are also the reason Crowe has built such trusted relationships. Crowe’s commitment to ethical conduct extends to the relationships that we nurture throughout our supply chain. This Supplier Code of Conduct communicates basic guidelines and expectations for Supplier conduct and commitment to ethical and legal requirements.

Crowe values

Crowe’s Supplier Code of Conduct was developed based on our established core values. Our values have sustained our success, guiding our business decisions, our brand promise, and now our corporate responsibility practices. Our core values – **care, trust, courage, and stewardship** – guide our interactions with our colleagues and clients and have led to more than 75 years of success and growth. Crowe expects our Suppliers to adhere to the same central values in how they operate and make decisions.

Supplier definition

The Supplier Code of Conduct applies to any third party that contracts with Crowe and Crowe United States (“US”) affiliates to provide goods or services for the purpose of doing business with Crowe or Crowe clients. This Supplier Code of Conduct extends to the third party, its employees, and its subcontractors (“Supplier”).

Care

We truly, deeply care about other, our employees, and the future.

We invest our time and energy into our people and value their success. We believe in building each other up and showing our gratitude to one another.

As a principal value at Crowe, we demonstrate care in the way we conduct business internally and with third parties, including our clients and Suppliers. This means we require our people to act with integrity and comply with anti-corruption and fair competition laws and regulations. We expect our Suppliers to commit to the same level of care in their policies and actions.

Business integrity

Suppliers will comply with all applicable laws and regulations and conduct their business in an ethical manner. Suppliers are expected to establish and sustain standards of fair business practices. Suppliers will maintain a process to enable their employees and contractors to report incidents of unethical behavior.

Financial integrity and recordkeeping

Suppliers are expected to maintain accurate and complete internal financial records and reporting documents to ensure compliance with their obligations to Crowe. Suppliers will manage business records per federal, state, and local laws and regulations, requiring specific retention periods for records.

Bribery, corruption, and financial crimes

Suppliers will not practice or tolerate any form of corruption, extortion or embezzlement. Suppliers will not offer or accept bribes or make unlawful payments, directly or indirectly. Suppliers will not engage in or assist any third party with money laundering, terrorist financing or other financial crime activities. Suppliers are expected to implement reasonable measures to prevent bribery and ensure that their workforce complies with applicable anticorruption laws and regulations.

Fair competition

Suppliers will conduct their business in line with fair competition and in accordance with all applicable anti-trust laws and regulations. Suppliers will not enter into agreements or practices that have a restrictive result on competition, such as price-fixing, market allocation, or abuse of a dominant position.

Conflicts of interest

Suppliers will avoid conflicts of interest or situations giving the appearance of a potential conflict of interest. Suppliers are expected to make decisions based on objective criteria, and not allow bias, personal or professional relationships, or inappropriate influence of others to improperly impact their responsibilities and professional judgements.

Independence

Dependent on the nature of the relationship between Crowe and the Supplier, there may be specific instances when the independence standards for Crowe, as a public accounting and consulting firm, apply to our Suppliers. When these requirements arise, Crowe will advise Suppliers of these obligations. When applicable, Suppliers are expected to have practices in place to comply with independence standards.

Insider trading

Suppliers will not engage in insider trading, insider dealing or inappropriately attain or disclose inside information. Suppliers will not use material or non-publicly disclosed information obtained during their business relationship with Crowe or otherwise, as the basis for executing security transactions.



Trust

We empower our people to be leaders: to be agile, to lead with integrity, and to extend trust to others.

Doing the right thing is how we built our reputation. We've set our sights high, but we'll never lower our standards to get there, and we trust our people to do the same.

As a guiding value at Crowe, we create trust in how we establish and maintain our relationships with our colleagues and clients. This means protecting confidentiality, privacy, intellectual property, and data security with a level of attention that complies with regulation, and moreover supports our personnel and clients in a way that radiates full confidence in doing business with Crowe. We expect our suppliers to commit to the same level of trust in their business conduct.

Data privacy and confidentiality

Suppliers will comply with applicable privacy and data protection laws and regulations when personal information is collected, stored, processed, transmitted, or shared. Suppliers will protect the privacy of personal information of everyone the Suppliers conduct business with, including other suppliers, customers, and workers. Suppliers with access to Crowe client data are required to commit to implementing and maintaining appropriate security and privacy safeguards.

Information security and data protection

Suppliers will implement and use the appropriate security and privacy controls that protect Crowe and Crowe client data against unauthorized access and use. Suppliers will implement controls that meet or exceed Crowe's contractual requirements to safeguard digital and physical information and assets. Suppliers will not re-use Crowe or Crowe client data for their own business purposes, without prior written consent.

Intellectual property

Suppliers will respect and comply with laws and regulations governing intellectual property rights, including protection against disclosure, trade secrets, patents, copyrights, and trademarks. The use and transfer of technology and know-how is expected to be conducted in a manner that protects intellectual property rights.

Social media

Suppliers will not engage in social media behavior that is damaging or defamatory to Crowe's business, partners, employees, clients or other suppliers. Suppliers will not disclose sensitive, proprietary, confidential, or financial information about Crowe on social media. Supplier communications on social media platforms should not be presented as, or implied to be, made on behalf of Crowe. Suppliers have responsibility to manage social media communications in a professional manner, and to not post discriminatory or harassing messaging on social media.



Courage

We encourage our people to be bold and take action, knowing their team will support them.

We stand up, step out, and speak our minds without fearing the unknown. We dare to do great things, challenge the status quo, and blaze trails for the next generation to follow.

As an essential value at Crowe, we display courage in how we treat our employees, suppliers, clients and other third parties. Crowe strongly believes in the value and unique perspectives diversity and inclusion bring to our workplace. Treating our people fairly and providing safe and compliant workspaces is and should be a baseline expectation for our personnel. We expect our suppliers to commit to the same level of courage in their business conduct.

Fair treatment and non-discrimination

Suppliers will not discriminate in screening, hiring, compensation, access to training, promotion, termination, retirement and/or other employment practices based on race, color, ethnicity, age, sex, national origin, religion, disability, gender identity or expression, marital status, pregnancy, sexual orientation, religion, political affiliation, union membership, veteran status, or any other characteristic protected by law. Suppliers will not permit harassment, abuse, corporal punishment, or inhumane treatment. Suppliers will not subject workers or potential workers to unlawful medical tests or physical exams. Workers are expected to be evaluated based on their ability and qualifications to perform the job.

Diversity, equity, and inclusion

Suppliers are expected to take reasonable measures to establish programs to enhance diversity, equity and inclusion within their business, and to provide transparency regarding diversity representation as appropriate. Diversity, equity, and inclusion actions should further advancement of underrepresented groups, through recruitment, development, and retention activities.

Accessibility

Suppliers are expected to support relevant accessibility standards, innovation, and best practices to create an inclusive workplace for people of all abilities.

Child labor

Suppliers will not use child labor. Suppliers will not employ workers under the age of 16 or the minimum legal working age, whichever is greater. Workers under the age of 18 will not perform work that is likely to endanger their health or safety. In cases where workers under the age of 18 are legally permitted to work, employment will not interfere with compulsory education. Suppliers may employ workers under the age of 18 in bona fide apprenticeship programs or student internships, when those programs have adequate oversight and supervision, and comply with all legal requirements, including those relating to required permits, work hours, wages, and working conditions.

Forced labor

Suppliers will not engage in or support human trafficking or modern slavery, including any form of forced, bonded, or involuntary labor within its business or in its supply chain. All workers must be free to terminate their employment at any time, and work must be conducted based on freely agreed terms. Suppliers will not hold workers' identity, immigration, or work permit documents longer than is reasonably necessary for administrative processing. Suppliers are expected not to require workers to pay recruitment fees or other fees in exchange for employment, either directly or through third parties. Suppliers will not demand work from an individual under threat of coercion. Suppliers will not unreasonably restrict workers' freedom to move into, out of, or at working facilities.

Wages, working hours, and other considerations

Suppliers will pay wages and benefits, in compliance with applicable laws and regulations. Suppliers will provide workers documentation specifying the basis on which they are paid. Suppliers are expected not to deduct from wages as a disciplinary measure. Suppliers will maintain working conditions in compliance with applicable laws and regulations for its entire workforce, including the payment of the minimum legal wage or a wage that meets local industry standards, whichever is greater, and the observation of legally mandated break and rest periods. Suppliers will not condone harassment of any type, including behavior such as verbal remarks, visual exhibits, physical advances, or bullying.

Health and safety

Suppliers will comply with applicable health and safety laws and regulations. Suppliers are expected to integrate sound health and safety management practices into all aspects of business. Suppliers will take adequate steps to minimize the causes of occupational hazards inherent in the work environment.

Freedom of association and collective bargaining

Suppliers will allow workers to legally organize, join associations, and seek representation in accordance with local laws and professional standards. Workers will be permitted to communicate grievances concerning working conditions to management, without retaliation or harassment.



Stewardship

We work hard to help our future generations thrive.

That's why we focus on the necessary endeavors of today to strengthen the communities of tomorrow. Some of the seeds we sow now may take decades to blossom, but we plant and tend them anyway. Our responsibility is in the here and now to benefit who and what comes next.

As a fundamental value at Crowe, we understand that the actions we take today, impact future generations. Environmental and community support are central to Crowe's mission. We aim to develop a network of employees, clients and other third parties that understand the value of protecting and nurturing natural and human resources today, and for generations to come. We expect our Suppliers to commit to the same level of stewardship in their business operations.

Environmental sustainability

Suppliers will comply with all relevant environmental laws. Crowe expects Suppliers to operate in a manner that actively manages risk, conserves natural resources, and protects the environment. Suppliers should take reasonable actions to establish a pragmatic approach to environmental stewardship. Specifically, suppliers are expected to manage hazards and opportunities associated with the environment, including potential risk from regulatory non-compliance, reputational loss, and opportunities for business growth through environmental and operational synergies. Suppliers are expected to commit to the efficient use of raw materials, energy and other natural resources while minimizing waste, emission and noise.

Community involvement

Suppliers are encouraged to advance the educational, cultural, economic and social well-being of the communities in the geographic footprint of their operations.



Compliance

Crowe expects Suppliers to act in compliance with this Supplier Code of Conduct and to comply with applicable laws and regulations in effect in the geographies of their operations. This Code of Conduct is intended to set forth a framework for Suppliers to develop and sustain business practices and processes to meet Crowe expectations. The Supplier Code of Conduct is intended to establish minimum criteria for Suppliers' workplaces. Suppliers may need to consider enhanced standards to achieve compliance with local laws, regulations, and industry best practices.

Crowe expects that Suppliers have taken reasonable action to implement processes and internal controls to comply with this Code of Conduct. Suppliers retain accountability for their own decisions and behaviors in conducting business.

If Crowe learns that a Supplier is not in compliance with this code, Crowe retains the right to request a remediation plan in relation to the area of noncompliance and/or terminate the Supplier relationship.

Suppliers can raise concerns or report suspected or actual violations directly to Crowe's website at <https://www.crowe.com/contact-us> or by phone in the US at 800-599-2304.



Continuous improvement

Crowe is committed to working with and supporting our Suppliers to meet, and when possible, exceed, the requirements in this Supplier Code of Conduct. Suppliers are expected to demonstrate a commitment to quality and continuous improvement throughout their operations. Suppliers should strive to employ leading practices.



Changes to the Supplier Code of Conduct

This Supplier Code of Conduct may be revised or updated by Crowe from time to time. To the extent

there is a conflict between this Supplier Code of Conduct and any applicable law or agreement between Crowe and the Supplier, the applicable law or agreement between Crowe and Supplier will apply.

“Crowe” is the brand name under which the member firms of Crowe Global operate and provide professional services, and those firms together form the Crowe Global network of independent audit, tax, and consulting firms. Crowe may be used to refer to individual firms, to several such firms, or to all firms within the Crowe Global network. The Crowe Horwath Global Risk Consulting entities, Crowe Healthcare Risk Consulting LLC, and our affiliate in Grand Cayman are subsidiaries of Crowe LLP. Crowe LLP is an Indiana limited liability partnership and the U.S member firm of Crowe Global. Services to clients are provided by the individual member firms of Crowe Global, but Crowe Global itself is a Swiss entity that does not provide services to clients. Each member firm is a separate legal entity responsible only for its own acts and omissions and not those of any other Crowe Global network firm or other party. Visit www.crowe.com/disclosure for more information about Crowe LLP, its subsidiaries, and Crowe Global. The information in this document is not – and is not intended to be – audit, tax, accounting, advisory, risk, performance, consulting, business, financial, investment, legal, or other professional advice. Some firm services may not be available to attest clients. The information is general in nature, based on existing authorities, and is subject to change. The information is not a substitute for professional advice or services, and you should consult a qualified professional adviser before taking any action based on the information. Crowe is not responsible for any loss incurred by any person who relies on the information discussed in this document. Visit www.crowe.com/disclosure for more information about Crowe LLP, its subsidiaries, and Crowe Global. © 2023 Crowe LLP.