



The Crowe Way

What it looks like to move forward as one at Crowe.

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We all want to be part of a firm we can be proud of – where each of us are living our shared values in everything we do.

Welcome

The core values of Crowe have always guided our firm and made it strong. These values reflect what we hold important – as individuals and as a firm.

Each day presents an opportunity for us to live these core values, especially when we encounter opportunities, challenges, and potential risks to the firm, our people, and our clients. In these moments, we should be guided by our values to make the responsible, ethical decisions that shape a better tomorrow.

While it’s not possible to provide guidance on every situation we may encounter, let The Crowe Way be your first resource and guide. In it, you’ll find definitions, behaviors, and common scenarios, in addition to lists of resources and contacts for making educated decisions.

We believe in our firm’s values, and we believe in you, our colleagues. By living out our values every single day, in every single interaction, we are building a shared enterprise we can all take pride in. The Crowe Way also allows us to serve as a model in the profession.

Together, our Management team and Board of Directors make a personal commitment to each of you to follow The Crowe Way in letter and in spirit. We count on you to do the same.

Sincerely,

Mark Baer Chief Executive Officer	Lou Miller Board Chair	Steve Strammello Chief Executive Officer-Elect
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What is the Crowe Way?

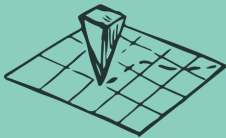
The Crowe Way is how we live our values – doing the right things, at the right time, for the right reasons.

Where to go for specific policies, standards, and points of contact.

The firm’s library of policies and procedures support The Crowe Way. You can (and should) reference these resources on The Nest whenever they apply to you.

The Nest addresses in detail how you can get more information about the professional and personal standards that apply to our business. By taking the time to understand these standards, you do your part to help ensure we are compliant with the laws and regulations that apply to us and to our clients.

The Nest also provides additional points of contact for further assistance or consultation.



The Crowe Way is our business code of conduct. It provides the standards and expectations of ethical and professional conduct the firm requires as we do business, regardless of the situation.



The Crowe Way is a living document. It applies to every individual at Crowe, regardless of title or position. Everyone is responsible for modeling and supporting these important values and behaviors.



The Crowe Way is a great place to start conversations with your teams. Figure out what each value and behavior mean for you personally, in your specific context and in relation to your specific personal and career goals.

The Crowe legacy

For more than 80 years, values have been the driver of Crowe’s success.

Care

In 1942, Fred P. Crowe, Sr., and Cletus F. Chizek established an accounting firm in South Bend, Indiana. As a small firm, Crowe Chizek emphasized personal relationships, fostering a “family feel” that anchored the firm as it grew.

Trust

From the beginning, the firm upheld Clete Chizek’s high standard of excellence. For many years, the managing partner personally reviewed all deliverables before they were issued. This meticulous attention to quality and exceptional service led clients to recommend the firm to contacts across the Midwest.

Courage

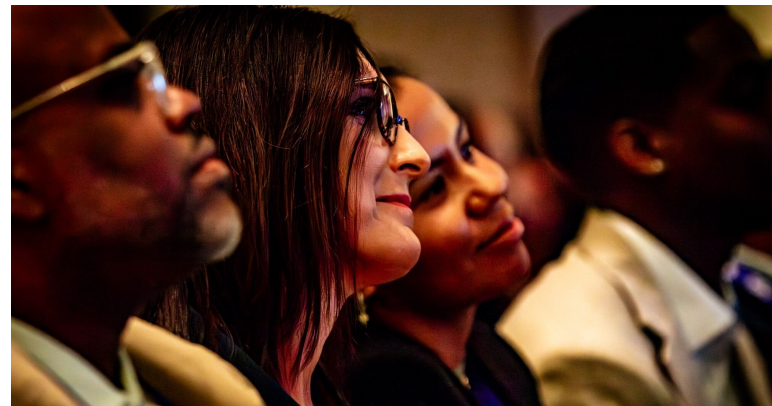
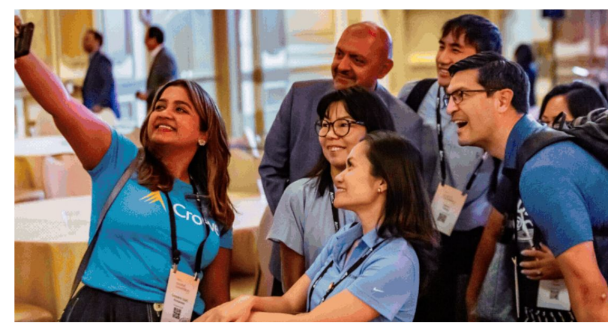
New ideas about how to serve client needs drove the firm’s growth over the years. In the 1960’s, the firm developed a banking practice that became the foundation for our commitment to deep industry specialization. Client needs also led the firm to be an early adopter of consulting and technology services, and inspired the firm’s affiliation with Horwath International in 1991.

Stewardship

Through each era, from Crowe Chizek to Crowe Horwath to Crowe LLP, the firm thrived because it provided unique opportunities to smart, curious people who wanted to do something big. Over eight decades, this investment in individuals’ growth resulted in firm growth, and a tomorrow – our today – that must have been unimaginable in 1942.

“There have been many success factors contributing to our present position...a **high degree of mutual respect** among everyone in the organization, **uncompromising integrity and honesty**, a **willingness to change course when appropriate**, and a **willingness to invest in the firm's future.**”

From “Remembrances of Crowe Chizek during 1942-1992,” by Fred Crowe, Jr.



SHAPING YOUR BETTER TOMORROW. TOGETHER. TODAY.™

Our purpose

Our purpose is about working together to **build a better future** for ourselves, our clients, and our communities – a future rooted in the actions each one of us takes today.

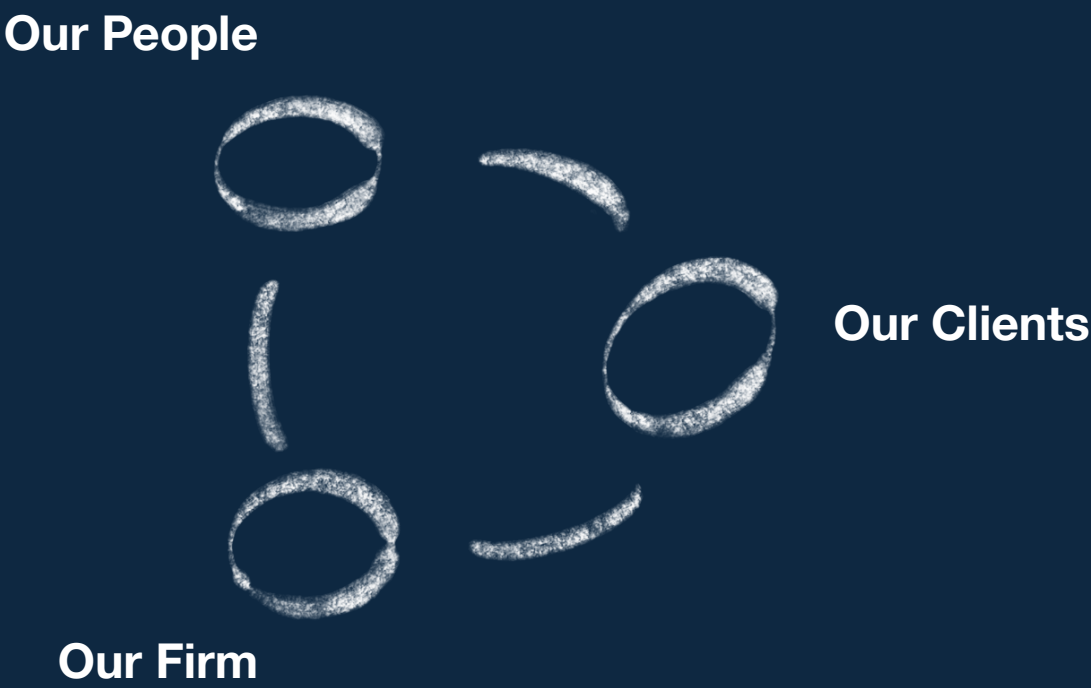
This purpose is informed by the long legacy of Crowe. It's the intention behind our actions, and it reflects what we hold important as both a firm and as individuals.

Our guiding philosophy

Success is a balance of the needs and outcomes of the client, the individual, and the firm.

All these stakeholders matter. We believe that **considering the needs of each stakeholder** at every decision point leads to the best outcomes at all levels.

There is no hierarchy among the needs of these three stakeholders. In the short term, one or more stakeholders' needs may take precedence, but over the longer term we define success as exceeding the expectations of all three.



Crowe Values and Behaviors

The Crowe Way lays out the values that inspire our best efforts, with behaviors to serve as our practical guide for action.

Values are what we believe to be important. But what does it look like to “walk the walk” of the values we share? Behaviors are values in action, what we can point to and say, “Yes, this is what care looks like.”

By defining specific value-driven behaviors, we are creating a shared language – a way to understand, together, what it means to live out our values every day, every hour, at each moment of decision.



Care

We truly, deeply care about others, ourselves, and the future.

We invest our time and energy into our colleagues and clients, and we value their success. We believe in building each other up and showing our gratitude to each other.

Our Care will bring **our people** to a future where they thrive because they feel valued.



Our Care will bring **our clients** to a future where they thrive because they feel supported.

Our Care will bring **our firm** to a future where it thrives as a desirable employer and service provider.



Behaviors that show Care

Humility

Showing humility isn't making yourself blend into the wallpaper or minimizing the talents, skills, and perspectives you bring to the table. It's remembering that other people bring important talents, skills, and perspectives to the table too, and remembering to listen before we respond or jump to conclusions and answers.

Gut check:
We'll listen first.

Personalization

We can't make everything perfect for every person. But we can show each colleague and client that they matter. We can take into account a person's needs and hopes for the future when we make decisions that concern them. We can build intentional, inclusive relationships where everyone flourishes.

Gut check:
We'll consider the person.

Mutual support

We all have unique priorities and constraints. But we're a team, and we're in this thing together. This means that sometimes we'll have to make our colleague or client's biggest priority our biggest priority. No one should feel like they have to do it alone.

Gut check:
We'll have each others' backs.

Constructive communication

Everything works better when all the information is on the table – projects, teams, client relationships. That depends on direct, clear, consistent, honest, positive communication. (There's no excuse for being disrespectful.)

Gut check:
We'll tell it like it is. Respectfully.

Care scenarios

What if I unexpectedly get tickets to a major musical event – but attending the event will mean I can't meet a major client deadline? What should I do?

Even if the tickets are to an epic concert experience, you can't just leave your team to deal with your absence. Before you make last-minute plans right before a client deadline – whether it's for a concert, a long weekend getaway, or a two week vacation – you need to check with your team members to see if they can cover for you. If your team members can cover for you, you still have to get approval from management. If your team members can't make the deadline without you, be understanding and kind! It is your responsibility to figure out how to get the client work done in a timely manner, at high quality, even if that means missing the concert.

Whenever it comes to planning, communicating, and taking time off from work, Crowe expects that you will use good personal judgement and respect your obligations to your team and the client. You should always coordinate time off with your team and management, as well as request and obtain approval well in advance for anticipated time off. You show care by making sure your client's and your team's needs are met.

What if my manager makes jokes and comments that make members of my team feel uncomfortable. What should I do?

Crowe expects and accepts only respectful treatment of others. The firm absolutely opposes and prohibits the harassment or discrimination of any individual at any time, whether in a Crowe office, at a client, or at an outside meeting or event. If you have concerns or if you're unsure and need guidance regarding a specific work situation, reach out to your coach, the engagement partner, a Talent Solutions business advisor, or another leader you trust. If you prefer to ask for advice anonymously, you can also contact the Crowe Values Helpline.

What if a colleague's cultural or social values conflict with my personal beliefs? How do I handle this, while upholding the firm's standards?

You are not expected to change your personal beliefs to support a colleague's cultural or social values. You *are* expected to collaborate with a positive attitude and demonstrate respect (with the expectation that you are being respected in return). If the colleague attempts to force their views on you, especially in a way that makes you uncomfortable, reach out immediately to your coach, the partner responsible for an engagement you and your colleague are jointly supporting, or another trusted leader. You can also contact the Crowe Values Helpline for advice. Whether it's a project switch, additional support, or some other arrangement, the firm can provide resources to help you through the situation.

What if a client or colleague is dealing with a personal issue that affects their ability to meet business deadlines. How do I respond?

Start with empathy. Let your client or colleague know you're sorry to hear about their situation. Keep the news confidential, especially if it's related to the client's health or the health of a family member.

If possible, ask who can fill in while they are attending to the difficulty. Focus on your desire to be helpful and to progress the project based on the timelines established. Continue to provide progress reporting (including the person who may be unavailable) so that they know what has happened when they return.

What if my teammate is not pulling their weight on a project? How do I take action without throwing them under the bus?

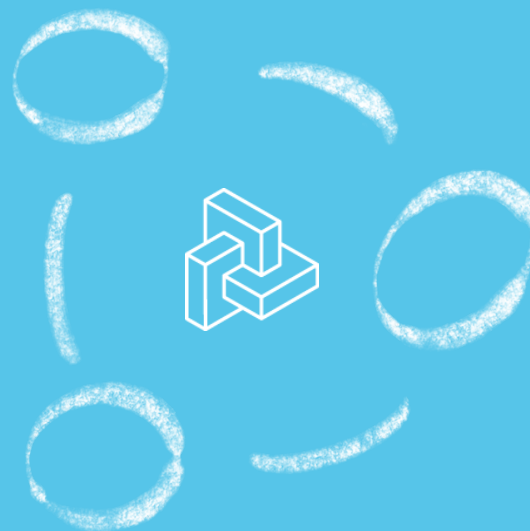
Constructive feedback is a critical ingredient of positive work relationships. Too often we shy away from it. But your colleague needs to know you feel this way. Instead of venting to third parties, you should make time for a personal conversation with your teammate. Let them know what you value about their contributions, and let them know how you think the project would benefit if they gave more attention to it. We all need to get better at giving constructive feedback – and at receiving it gracefully.

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.

Our Trust will bring **our people** to a future where they feel empowered.



Our Trust will bring **our clients** to a future where they feel secure.

Our Trust will bring **our firm** to a future where it is a beacon of integrity and reliability.



Behaviors that earn Trust

Transparency

When someone is hoarding information or avoiding tough conversations, there’s no opening for trust. By communicating facts, information, and context clearly and openly, we empower everyone to make more informed decisions – and build trust in the process.

Gut check:
We’ll be honest and open.

Reliability

Trust has to be earned. Showing up. Being mentally present. Contributing. Following through on commitments. Whether it’s our clients, our teams, or even our families and friends, this is how we earn trust and ensure people can rely on us every time.

Gut check:
We’ll do what we said we’d do.

Quality

Trust isn’t built on shortcuts, half-measures, or mediocre results. Consistent quality, even under pressure, must be our default – because exceptional standards and attention to detail are a foundation of our brand promise. And trust is about keeping promises.

Gut check:
We’ll give our best every time.

Inter-dependence

Our firm is built on recognizing collective contributions, not individual heroics. We work together as one across teams, disciplines, and technologies to move our shared enterprise forward in the same direction.

Gut check:
We’ll work as a team.

Trust scenarios

What if my friend asks if I can meet after work and help them pass the exam for a required firm training? I already passed it and my friend is having trouble. What should I do?

Our professional ethical standards and code of conduct prohibit us from assisting another person with an exam or collaborating on an exam. Each individual must take an exam on their own, without assistance. You should tell your friend that you cannot help them pass the exam. Remind them that within the exam, there are course-specific resources that may be used for review. It's also okay to sit through the training more than once to prepare for the exam.

What if a colleague asks me to send client files with sensitive data? How should I respond?

We must always remember that client data does not belong to us. We have made a commitment to data privacy and confidentiality, and we must use data only for what we said we would in our contract. If your colleague is permitted to have access to the client files, you must make sure that you protect the files with the proper security. If your colleague is not permitted access to the files, you should politely decline.

It's important to bear in mind that we must constantly earn and re-earn trust. When trust is lost, it's extremely challenging to get it back!

What if I am offered the opportunity to work for another employer on a contract or part-time basis. I believe I can perform the work in my spare time. Do I need to let Crowe know?

You may, under certain circumstances, accept casual outside employment, if no conflict with Crowe's interest is involved. This work **MUST** be performed after working hours. Crowe and Crowe client needs must take priority, and no Crowe assets (e.g. laptop, email, software, copier, etc.), resources, or data may be used. Outside employment requests that interfere with your primary job, create a conflict of interest, or jeopardize the firm's reputation or relationships are generally not approved.

If you wish to obtain outside employment, the first thing you should do is to notify Talent Solutions directly; you may do so through your manager if you choose. Talent Solutions will review the details of your request and provide you with a determination as quickly as possible.

What if a potential client offers me a gift in exchange for a favorable outcome? How do I handle the situation in a way that upholds integrity and avoids conflicts of interest?

If this situation ever arises, it is very appropriate to say, "Thanks, but no thanks." We should not be accepting any gifts or exchanging any favors with clients and prospects. Tell the potential client that putting our client first will always happen; it doesn't require a gift. Our relationships with both clients and prospects should be rooted in mutual trust and respect, not gifts in exchange for favors.

What if I'm running behind on a project deadline? How do I communicate the delay to the client in a way that preserves their trust while being honest about the situation?

Speaking honestly, without delay, is the best thing you can do to maintain the client's trust and respect. First, let the engagement partner know about the issue. Then work with the engagement partner to create a plan for telling the client. The sooner you tell the client, the sooner they can take appropriate action. Without making excuses, tell the client why the project is behind and when you can complete the project. Give them space to express disappointment. Then let the client know what you are doing about the problem. With the client, decide on a cadence of future updates – and then *a/ways* do what you say you are going to do.

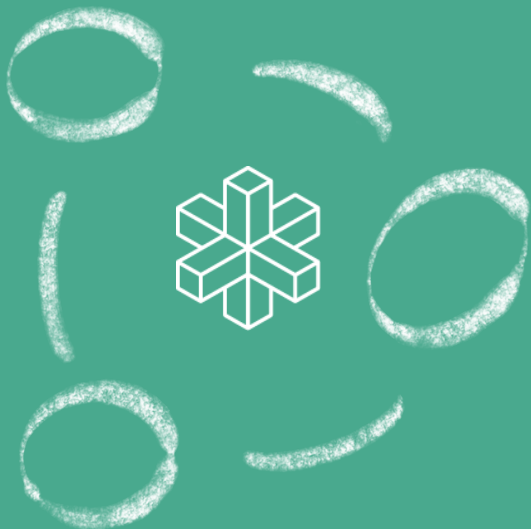
In general, it's best practice to keep both your engagement partner and the client routinely informed about the status of projects. This regular visibility can prevent unpleasant surprises and loss of trust.

Courage

We embrace **Courage** in every decision we make.

We stand up for what’s right, even when it’s difficult. We challenge the status quo, take calculated risks, and learn from our failures. We believe in pushing boundaries to create new opportunities, knowing that growth often requires stepping into the unknown with confidence.

Courage will bring **our people** to a future where they grow and innovate.



Courage will bring **our clients** to a future where they benefit from bold and innovative solutions.

Our Courage will bring **our firm** to a future where it leads with vision and resilience.



Behaviors that show Courage

Constructive conflict

Conflict isn’t always a bad thing – as long as we treat each other with respect and always keep our shared goals in mind. Constructive conflict can be hard and push us beyond our comfort zones, but we can’t solve problems without it.

Gut check:
We’ll have the hard conversations.

Bold action

Taking risks is something we’re conditioned to be very careful of in our business – for good reason. But bold action is not recklessness. It’s the willingness to think big. It’s knowing the right time to do something different, based on a considered calculation that the opportunities and benefits far outweigh the risks.

Gut check:
We’ll take measured risks.

Experimentation

“Innovation” can seem like a cliché. But what we’re really talking about is testing new ideas to see if they stick. Failure isn’t just a possibility; it’s a probability. And that’s okay. Getting comfortable trying things, learning from mistakes, and continuously improving – this is the only true path to innovation.

Gut check:
We’ll try new things.

Integrity

The thing about integrity is, you either have it or you don’t – no exceptions for a “slight misrepresentation” or “a little light cheating.” Integrity means we’re honest and we hold ourselves and each other to strong principles, even when no one’s looking. It may not always be the easy way, but it’s always the right way.

Gut check:
We’ll do the right thing, even when it’s hard.

Courage scenarios

What if I make a mistake on a client project? How do I address the issue with courage and transparency?

It feels awful to make a mistake on a client project! If this happens to you, know that you are not alone. Go to a leader as soon as possible. Let the leader know what has happened and how it happened. Apologize. Avoid blaming others for your own mistakes. Instead, take ownership of the situation and talk through options to fix it. Then work with leadership to determine if and how to alert the client or your teammates. If necessary, sincerely apologize to your teammates. Let them know what you have learned and work hard to demonstrate that you're applying what you learned.

Remember – everyone makes mistakes. When a colleague makes a mistake, be kind. Do your best to help them, and let them know they aren't alone.

What if I'm assigned a high-profile, complex project outside my comfort zone? How do I step up with courage, despite my concerns?

Here's the reality: it's unlikely that you've been given a high-profile, complex project accidentally. See this project as an opportunity to learn. Then rely on what got you here. Plan your day's work in advance. Develop a rhythm of getting work done. Learn all you can (even if it means doing research after hours). Routinely ask for feedback. If you mess something up, admit it fast, and fix it. Apply what you learned to help you work better, smarter, and faster. And don't forget: it's okay to say you're nervous out loud to a trusted advisor or colleague. (If someone reaches out to you in this way, be a cheerleader. Ask how you can support them!)

What if I begin having a personal relationship with someone who works at Crowe? Is there a need to share this with anyone at the firm?

While Crowe recognizes that personal relationships between colleagues may develop, relationships between direct supervisors and team members are inappropriate. A "direct supervisor" is anyone who is in charge, or in a lead role that has authority over other individuals. At no time should a relationship exist between an individual in a position of authority and a subordinate. If such a relationship does develop, the individuals involved should notify Talent Solutions that they are in a direct supervisor-subordinate role relationship and ask for assistance on navigating next steps.

What if I need to challenge a leader's decision that may compromise ethical standards. How do I voice my concerns?

Challenging a leader is very hard to do. Before you do anything, get your thoughts together. Write down the points you want to make when you speak with the leader. Think about alternative options, and ways that you could help. Then ask to speak with the leader in private. Thank them for their time. Avoid calling the leader unethical; instead, let them know you have some concerns you want to express. Focus on the decision and the related implications (have your notes with you and don't hesitate to refer to them). If appropriate, offer your assistance. Thank the leader again for listening and for making time for the discussion. If you feel that appropriate action has not been taken and it's necessary to escalate the situation, contact the Crowe Values Helpline to ask for advice.

Stewardship

We lead with Stewardship to protect and nurture the world around us.

We take responsibility for the resources entrusted to us, ensuring their thoughtful and sustainable use. We nurture our relationships, our environment, and our future by acting with integrity and care. We believe in leaving things better than we found them, creating a lasting positive impact for generations to come.

Our Stewardship will bring **our people** to a future where they develop and thrive.



Stewardship will bring **our clients** to a future with long-term value.

Our Stewardship will bring **our firm** to a future of sustainable growth built on a strong legacy.



Behaviors that demonstrate Stewardship

Ownership

You can't build anything of value when the default is, "That's not my problem." Owners don't wait for others to act or tell them what to do. Owners take an active role in outcomes and relationships. Find solutions. Push projects forward. Are accountable for results. Owners care deeply about building a better future for all.

Gut check:

We'll take responsibility.

Thoughtful investment

Growth can't happen without investment. But no one has the resources to invest in every possible area. We have to be strategic about what kind of investment will lead to the most benefit over time. We also have to be willing to stop and reallocate resources when investments don't yield results.

Gut check:

We'll put the right resources in the right places.

Sustainability

If an action or decision brings short term benefits but harms long term health, it's not good stewardship. We need to be making decisions that position us for success not just next week or next month, but for five and ten years down the road.

Gut check:

We'll think about future implications.

Adaptability

In today's world, the pace of change is fast and movement is inevitable. Survival depends on continued relevance and resilience. To meet the moment, we need to stay flexible: open to new mindsets and exploration, curious, willing to challenge a stale status quo.

Gut check:

We'll embrace positive change.

Stewardship scenarios

What if I don't have time to enter my time in Workday this week? Is that really a big deal?

The importance of fiscal responsibility cannot be overstated. If we don't get this right, we don't have a firm. How we track our hours, how we manage our spend, how we contract appropriately – all of these behaviors contribute to whether the firm has the ability to pay its employees, including you. By being responsible with the firm's resources (which includes entering your time into Workday in a timely fashion), you are demonstrating stewardship that benefits everyone.

What if I recognize an opportunity for improvement in a long-established process? How do I propose changes confidently, even if it may disrupt the status quo?

Quickly sketch out a high-level plan that enables you to explain your idea clearly and concisely: what the proposed improvement is, what the benefits would be, and what you think it would take to make the change. Then schedule time to talk with the process owner about your idea. The process owner may agree with you, or may need time to think about it, or may be committed to the existing process. Whatever the outcome, thank them and let them know you're ready to help move the idea forward when the time is right.

What if I'm asked to take shortcuts on a project that might lead to compromised results? How do I uphold the firm's commitment to quality?

Shortcuts are not the way we work. If you're asked to take shortcuts on a project by a team member at Crowe, remind them patiently and kindly that quality is critically important for the firm. If that doesn't help, consider speaking with the project leader. If the person pushing you to take shortcuts IS the project leader, ask the area leader or project sponsor to reinforce the importance of thinking strategically and focusing on long-term value. You are also encouraged to contact the Crowe Values Helpline to ask for advice.

What if I make a slightly inappropriate post on my social media account? It's my personal account. Does the firm have anything to say about it?

You should not make such a post. Here's why: as individuals in the professional services business, we are always on the clock. Every interaction counts, whether it's after hours, in a social setting, or on social media.

It matters how we show up in the world, because people watching us will identify our actions with Crowe. This doesn't mean we can't have a personal life, but it does mean that even in our personal lives we should conduct ourselves with professionalism (responsibility, integrity, accountability, excellence) at all times.

Behaviors that show Care

Humility

Showing humility isn’t making yourself blend into the wallpaper or minimizing the talents, skills, and perspectives you bring to the table. It’s remembering that other people bring important talents, skills, and perspectives to the table too, and remembering to listen before we respond or jump to conclusions and answers.

Gut check: **We’ll listen first.**

Personalization

We can’t make everything perfect for every person. But we can show each colleague and client that they matter. We can take into account each person’s needs and hopes for the future when we make decisions that concern them. We can build intentional, inclusive relationships where everyone flourishes.

Gut check: **We’ll consider the person.**

Mutual support

We all have unique priorities and constraints. But we’re a team, and we’re in this thing together. This means that sometimes we’ll have to make our colleague or client’s biggest priority our biggest priority. No one should feel like they have to do it alone.

Gut check: **We’ll have each others’ backs.**

Constructive communication

Everything works better when all the information is on the table – projects, teams, client relationships. That depends on direct, clear, consistent, honest, positive communication. (There’s no excuse for being disrespectful.)

Gut check: **We’ll tell it like it is. Respectfully.**

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Reliability

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Gut check: **We’ll do what we said we’d do.**

Quality

Trust isn’t built on shortcuts, half-measures, or mediocre results. Consistent quality, even under pressure, must be our default – because exceptional standards and attention to detail are the foundation of our brand promise. And trust is about keeping promises.

Gut check: **We’ll give our best every time.**

Inter-dependence

Our firm is built on recognizing collective contributions, not individual heroics. We work together as one across teams, disciplines, and technologies to move our shared enterprise forward in the same direction.

Gut check: **We’ll work as a team.**

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Conflict isn’t always a bad thing – as long as we treat each other with respect and always keep our shared goals in mind. Constructive conflict can be hard and push us beyond our comfort zones, but we can’t solve problems without it.

Gut check: **We’ll have the hard conversations.**

Bold Action

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Gut check: **We’ll take measured risks.**

Experimentation

“Innovation” can seem like a cliché. But what we’re really talking about is testing new ideas to see if they stick. Failure isn’t just a possibility; it’s a probability. And that’s okay. Getting comfortable trying things, learning from mistakes, and continuously improving – this is the only true path to innovation.

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Gut check: **We’ll do the right thing, even when it’s hard.**

Behaviors that demonstrate Stewardship

Ownership

We can’t build anything of value when the default is, “That’s not my problem.” Owners don’t wait for others to act or tell them what to do. Owners take an active role in outcomes and relationships. Find solutions. Push projects forward. Are accountable for results. Owners care deeply about building a better future for all.

Gut check: **We’ll take responsibility.**

Thoughtful investment

Growth can’t happen without investment. But no one has the resources to invest in every possible area. We have to be strategic about what kind of investment will lead to the most benefit over time. We also have to be willing to stop and reallocate resources when investments don’t yield results.

Gut check: **We’ll put the right resources in the right places.**

Sustainability

If an action or decision brings short term benefits but harms long term health, it’s not good stewardship. We need to be making decisions that position us for success not just next week or next month, but for five and ten years down the road.

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In today's world, the pace of change is fast and movement is inevitable. Survival depends on continued relevance and resilience. To meet the moment, we need to stay flexible: open to new mindsets and exploration, curious, willing to challenge a stale status quo.

Gut check: **We’ll embrace positive change.**

Individual responsibilities

Every one of us, from intern to CEO, should commit to upholding and modeling the values and behaviors of The Crowe Way.

- ✓ Am I upholding the values and behaviors of The Crowe Way and the policies of the firm?
- ✓ Do I thoroughly understand the professional, ethical, and legal standards that apply to a given situation? Do I know where to go for more information?
- ✓ Am I on the alert for situations that may be unethical, inappropriate, or illegal? Do I know where to go for help or advice in these situations?
- ✓ Are my actions helping build a safe, healthy, supportive working environment for all?
- ✓ Am I avoiding both personal/financial interest and the potential for or appearance of gain in a Crowe transaction?
- ✓ Am I acting in ways that I would feel comfortable describing at a firm meeting or reading about in news headlines?

Leadership responsibilities

Leaders have extra responsibilities. Eyes are on you. What you do and say sets the tone for others.

- ✓ Am I modelling what it looks like to uphold the values and behaviors of The Crowe Way?
- ✓ Am I encouraging the people I work with and lead to uphold the values and behaviors of The Crowe Way?
- ✓ Am I being consistent, respectful, and fair?
- ✓ Am I making sure the people I lead have the knowledge and resources to make the right choices and act with integrity at all times?
- ✓ Am I addressing questions or concerns in an appropriate and timely manner?
- ✓ Am I aware of the professional, ethical, and legal standards that apply to my role and the areas I'm responsible for, so I can provide appropriate guidance and leadership?
- ✓ Do I know with whom I should consult to make sure the best actions are being taken at all levels?

No one at Crowe will be subject to reprisals or retaliation because they in good faith questioned, discussed, or formally reported a compliance or ethics concern.

Addressing potential violations

Each of us at Crowe is required to fully comply with all applicable laws and regulations. We are also required to refrain from even the appearance of having engaged in any illegal, dishonest, or unethical conduct in all business contacts and relationships.

If a situation arises in which you are having difficulty determining the proper course of action, or you are questioning the behavior of another member of the firm or a client action, you should discuss the matter with a partner. If you feel like you're not being heard, or if you prefer to report the concern anonymously, you can take your concern to the Crowe Values Helpline.

Crowe requires each of us to report any violation or suspected violation that has occurred (or may be about to occur) which is inconsistent with Crowe policies, professional standards, or applicable laws or regulations.

Types of issues to report:

- Professional standards non-compliance issues
- Conflicts of interest
- Unlawful discrimination or harassment
- Workplace violence
- Substance abuse
- Inappropriate actions such as gifts
- Entertainment that is not professional or relevant
- Political expression or activities that contribute to a hostile work environment
- Insider trading or other securities law violations
- Inappropriate reporting of time and expenses
- Falsification of documentation
- Retaliation
- Inappropriate use of firm resources, assets, or documents
- Breach of firm or client confidentiality
- Inappropriate relationship with client or vendor
- Other inappropriate actions, activities, or potential violations of firm policies

We work best when we work together as one.

“What if...everyone did this?”

When each of us takes personal responsibility for living into The Crowe Way, the impact will be exponential.

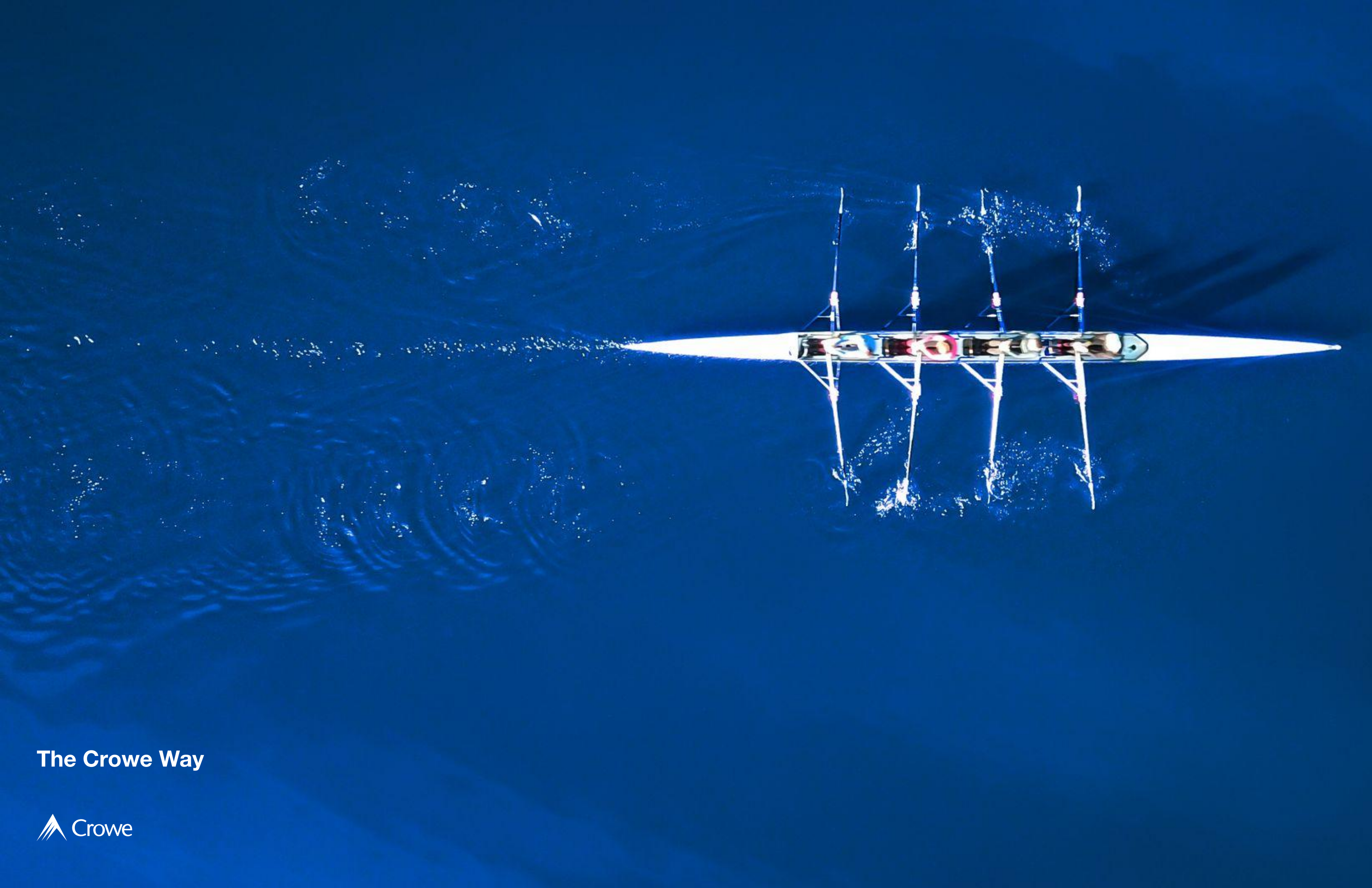
The Crowe Way is a powerful guide. But the real impact of The Crowe Way can be felt only when a critical mass of individuals internalize the behaviors and spirit of the code.

There will be cynics who find it difficult to believe that anyone can be motivated by anything other than self-interest. There will be hypocrites, who say one thing and do another.

The only thing any of us can truly control is our own choices and actions.

By living into The Crowe Way, we model for each other behaviors that make our shared working environment an energizing and healthy place to be. Behaviors that make us proud of the work we do for clients, and proud of our teams. Behaviors that create outcomes that are exciting and valuable – for our clients, for our firm, and for each of us as individuals.

The Crowe Way is an opportunity for us to inspire each other as we move together in the common direction of our purpose: Shaping a better tomorrow. Together. Today.



The Crowe Way

