

Code of conduct

Our uncompromising commitment to
professional excellence and ethical conduct

2019



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Our CLEARR values

Our CLEARR values — Collaboration, Leadership, Excellence, Agility, Responsibility and Respect — are the foundation for how we conduct business, serve our clients and behave, both within the firm and externally. A dedication to our CLEARR values is the personal responsibility of all personnel.

CLEARRly1



Collaboration

Work together;
act as one.



Agility

See with clarity;
act with purpose.



Leadership

Build trust;
make a difference.



Respect

Care deeply;
listen intently.



Excellence

Deliver quality;
pursue greatness.



Responsibility

Own your action;
be aware of your impact.

Our code of conduct

Standard of conduct

This Code of Conduct applies to all Grant Thornton LLP personnel and sets forth the standard we expect for their actions and behavior. We believe in conducting business and serving our clients following the highest ethical standards of conduct and behavior. We strongly encourage our people to ask questions as they arise on ethical standards and to consult with others on particular issues.

Specific guidance on the laws, regulations and professional standards applicable to our profession can be found in the firm's policies and procedures. However, we expect more from ourselves than mere compliance with laws and standards which is why our CLEAR values are embedded in Grant Thornton's culture. We demonstrate our commitment to integrity and quality by living those CLEAR values every day in our work and interactions with each other.

Reporting

Grant Thornton makes every effort to foster an environment in which people feel safe to report perceived unethical behavior without the fear of retaliation or retribution. There are multiple channels available within the firm to report violations, and people are encouraged to use them. If any person feels that any laws have been violated, or any policies or principles breached, this should be reported immediately. Grant Thornton will make all efforts to protect the confidentiality of those who raise concerns. No retaliation will be permitted against employees who report a concern in good faith, or who assist with an investigation. If you see something, say something.

The firm has an *Ethics Hotline* where matters can be reported anonymously either on the firm's intranet and external website or by calling the *Ethics Hotline* at +1 866 739 4134 to speak to a hotline representative. Issues can also be reported anonymously online through *EthicsPoint*.



CLEAR^{ly} values

Excellence

“Relentlessly focus on improving the way we do business.”

Our professional integrity

Honest dealing & fair treatment

Grant Thornton is honest and fair in its relationships with clients, and we strive to provide the highest quality of service. We build our relationships with clients on transparency, mutual trust, and open communication. Honesty and fairness is equally important in dealing with each other and is what we expect of everyone at Grant Thornton. Fairness also governs how we treat other businesses, including our vendors and competitors, and how we manage working relationships. We are honest in statements regarding our professional qualifications and in descriptions of our services.

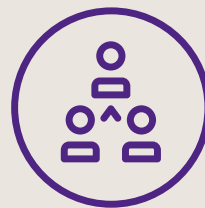
Time and expense reporting

Expenses and hours worked must be reported accurately and in a timely manner. This applies to both client billable and internal charge hours, including the over-reporting and under-reporting of hours worked, and any expenses reported to the firm. The intentional submission of false time or expense reports is considered serious misconduct, at a minimum, but could also constitute theft and/or fraud. In addition, by submitting time entries, individuals affirm that they have complied with applicable independence rules and related firm policies with respect to each client to which time was charged.

Business gifts and entertainment

Socializing and building relationships with our clients and expressing our appreciation for their business is consistent with our CLEARR values. This sometimes involves providing entertainment and giving business gifts which should be appropriate in nature and reasonable under the circumstances. The overriding principle we must follow is not to put another in a position, or allow oneself to be put in a position, where others might view that improper influence was involved in the making of decisions as a consequence of such business gifts or entertainment.

Further, in many instances, actions or conduct that are commonplace in the private sector may be improper or even illegal when dealing with government entities.



CLEARR^{ly} values

Leadership

“Live our values.
Act with integrity.”

One of the best examples is the limitation on gifts and gratuities to government employees. Consultation is required prior to providing anything of value to a government employee. We must conduct business with all government entities and their representatives ethically and in compliance with applicable laws and regulations. In addition, we train our people who work with state or federal government clients on procurement, bribery, and other applicable laws and regulations. Additional guidance is available on the firm’s intranet.

Records management

To meet our records management obligations, official records must be reliable and complete, and should be created for the specific purpose of communicating or documenting client or other business matters. Official records must not be altered or destroyed for any improper or illegal purpose. The following general rules apply:

- We must prepare records appropriately, in a timely manner and in reasonable detail.
- We only execute records that are truthful and complete, and that have been approved by the appropriate party.
- We must retain records in accordance with firm policy; and use and disclose firm records only as authorized by firm policy and applicable professional standards and law.

Professional licenses and continuing professional education

It is important that all professionals maintain the licenses and certifications that they are required to hold for their positions. The firm can assist in completing continuing professional education (CPE) requirements, but ultimately it is each individual's responsibility to meet these requirements. If personnel fail to maintain a license in good standing, it affects the ability to perform services for clients; and there may be other consequences to the individual and to the firm. Personnel are prohibited from "holding out" any licensure, credentials, or academic degrees that they do not have.

CPE (and other professional education) is required in order for our professionals to stay current with the latest developments, skills and standards in our profession and the industry. We should embrace these education requirements as an opportunity to advance our knowledge to help us better serve our clients.

Insider trading

During the course of our work for a client, we may be provided with material non-public information about that client. It is both unethical and illegal to buy, sell, trade, or otherwise participate in transactions involving securities while in the possession of such information. In addition, the disclosure of nonpublic information about a client to another individual or third party is not only a violation of client confidentiality, but could also constitute participating in insider trading if the recipient of the information uses it to buy or sell securities. Engaging in insider trading is grounds for discipline by the firm, and may subject the individual to civil and criminal penalties.

In addition, we must be careful when discussing client information in public places and must avoid making inadvertent disclosures of client-related information to others, including family members.





Question: I am a manager and was reviewing a proposal that we are about to send to a client. I am unsure about a claim we have included that states we are “the best” firm at providing certain services. Who can I ask about this?

Answer: Although we have top notch expertise in all the services that we provide, there are more appropriate ways to describe our services. We should not make comparisons to our competitors (directly or indirectly) without citing to a specific source, such as a trade magazine or publication. Please refer to our intranet for marketing resource materials and information on who to contact for help with proposal development and appropriate firm descriptions.

Question: A partner in our office went on vacation with his client. I heard through the grapevine that the partner paid for the client’s expenses related to the trip. What should I do?

Answer: This appears improper and should be reported to another leader in your office or service line. Building good working relationships with our clients is essential to our business success, and socializing is often an integral part of the development of such relationships. However, when relationships get too close they can compromise our ability to make objective and fair business decisions. Going on vacation with a client is already questionable judgment. But if the partner paid any part of the client’s vacation expenses, it could impair our objectivity (including independence if the client is an audit client) and could also be viewed as attempting to gain business through improper means.

Question: I am an associate who had 80 hours budgeted in an SOW for my work on an engagement. Because I have done similar work before and am very efficient, it only took me 70 hours. The manager thinks that I should report closer to 80 hours. What should I do?

Answer: You should speak to another supervisor and then report your time accurately. For a time and materials engagement, we can only charge the client a fee for the hours worked, and not based on the original estimate. You must be accurate in recording your time so that the firm charges the correct fee. Even in a fixed fee engagement, this principle applies and you should not artificially inflate or reduce the number of reported hours worked. Irrespective of the fee arrangement or the budgeted hours for a project, internal charge hours must accurately capture the time spent on an engagement.

Question: In connection with serving my oil & gas clients, I learn a lot about the industry including trends and market forecasts. Is it okay for me to consider this information in buying stocks? I know that I cannot own stock in the firm’s audit clients.

Answer: If the information you are referencing is in the public domain, then using that information in investment decisions is not considered insider trading. If you are unsure whether the information is in the public domain, then you should err on the side of caution and not act on the information. In general, a person who becomes aware of non-public information and trades on that basis may be guilty of a crime. Further we should not use information obtained from a client engagement for our own personal benefit.

Client relationships

Quality of service

Without quality, we have nothing. Grant Thornton has built its reputation on providing personalized attention and the highest quality of service to our clients. Professional excellence is perhaps the most important obligation of our profession. We pride ourselves on our dedication to quality, due care and professional competence. We only offer services that meet these high standards and all applicable professional standards and regulations. After all, Excellence is one of our CLEARR values and we live by it.

Protecting confidential and proprietary information

Confidential information means any non-public or proprietary information about our clients or personnel, or any non-public information that we have acquired during the course of business. This information is confidential, and all precautions are taken to avoid any breach of confidentiality. Client tax return information may not be used to offer non-tax services without advance written consent by the client. In addition, we require a nondisclosure agreement and client consent when we engage outside resources to assist us and furnish them with confidential information.

Confidential or proprietary information must be respected and never be used for personal gain. Grant Thornton respects all obligations of confidentiality unless discharged from such obligation by requirements of law or other principles of this code. For example, the firm may receive a subpoena where we have a duty to disclose confidential information to a proper authority.



CLEARRly¹ values

Collaboration

“Make other people better. Ask for help, give help.”

Privacy

It is our obligation to protect personal data from unauthorized access or disclosure to inappropriate third parties. We should only collect, access, use or disclose personal data for legitimate business purposes. And we should only collect, access, use and disclose the minimum amount of personal data required to accomplish a task.

Each of us must exercise good judgment in sharing private information about other individuals. Simply put, the private information of others must be treated discreetly, respecting the confidentiality of such information.

Conflicts

A conflict of interest may occur if we perform a professional service for a client and we also have a relationship with another person or entity that could be viewed by the client or others as impairing our objectivity. Potential conflicts are carefully monitored by Grant Thornton and we take all reasonable steps to avoid them.

In addition, situations which involve, or could appear to involve, conflicts between an individual's personal interests and those of Grant Thornton, or between one client and another, must be avoided or reported immediately. Although there are many situations that could lead to a conflict of interest, the following are some examples that would constitute a violation of this Code:

- Using the confidential information of one client obtained in the course of providing services to the detriment of another client.
- Inappropriate business gifts or entertainment (see above) that could be deemed an inducement to act other than in the best interests of an individual's employer.
- Having a private business on one's own time that involves similar services to those offered by the firm or otherwise interferes with firm business.
- Exercising influence over the hiring process, employment conditions, or performance assessment of a family member or any individual with whom one has an intimate personal relationship.

Independence requirements

Grant Thornton takes all necessary steps to preserve its independence from its clients pursuant to applicable regulations and professional standards. Independence and ethical rules generally require the firm and our people to be impartial, intellectually honest and free of conflicts of interest in performing services for our clients. The firm has a system for monitoring relationships with clients and other covered entities to ensure compliance with such professional independence rules. We also appropriately address every situation where our objectivity could be impaired or where the appearance of our objectivity could be questioned. Full cooperation from our people in this effort is not only expected, but necessary.

In addition, the firm has specific policy restrictions regarding personal investments, loans to and from clients, investments in common with clients, gifts and discounts from clients, and service as a trustee, executor, or board director. All personnel are expected to understand and follow the firm's policies, including adherence to the firm's self-reporting requirements relating to independence or ethical matters.

Illegal acts by clients

It is possible that in the course of an engagement, personnel may learn that a client's personnel or its contractors/vendors are committing illegal or unethical acts. If such acts are discovered or suspected, they must be reported to the engagement partner or service line leader immediately, and to the quality group for the particular service line. We have responsibilities to the client, and responsibilities under professional standards and applicable law, to take appropriate steps upon discovering such information. If it is unclear whether an act is illegal or unethical, the proper course of action is to consult with internal resources and not simply investigate on one's own. Most importantly, if you see something then say something.



Question: I am preparing a proposal for an exciting new client opportunity. A business development executive provided a list of client names to include as references in the proposal. I asked if written consent has been secured from the clients to use their names in the proposal and the answer was no. I am concerned — what should I do?

Answer: You are right to be concerned. Depending upon the situation, disclosing client names could be a violation of professional standards, IRS rules and/or contractual commitments. Before including another client's name in a proposal, you must obtain its written consent or obtain confirmation from your service line's quality group that such consent is not required under the specific circumstances. You should raise your concerns with the partner who is the proposal lead. If your concerns are not resolved by speaking to the partner, you should reach out to a professional in the quality group for your service line.

Question: The former CFO of one of my clients has asked me to serve as a personal reference for him in connection with a position that he is seeking. Is this a problem?

Answer: As much as we like to help others, you will need to politely decline. As a service provider to the client, we are not in a position to vouch for any individual employed by (or formerly employed by) a client. In addition, we must remain impartial and free of conflicts in our relationships with clients. We may not take actions (such as acting as a reference) that could give an appearance of the firm lacking objectivity.

Question: My client's regulator has reached out to me with questions regarding our work for the client and requested some documents. Can I call back?

Answer: First, you must notify the firm's legal department before taking any steps. The firm has confidentiality obligations to its clients including vis-à-vis a client's regulators. There are circumstances where the firm is required to provide information and/or documents to regulators but the firm's legal department should advise you and provide instructions to ensure we do not violate confidentiality and/or privilege.

Question: We have an audit and tax client with overseas operations. I learned about allegations that one of the client's foreign subsidiaries may have improper relationships with some of its customers. We do not separately audit any of the subsidiaries (and neither do any member firms of Grant Thornton International Ltd.) so do I need to worry about this?

Answer: Yes these allegations must be investigated. Suspected illegal activity could impact the services we are performing in a number of ways, in particular if we are performing audit services. Illegal activity at a foreign subsidiary of our U.S. based client could implicate our client under the Foreign Corrupt Practices Act and other anti-corruption laws. These laws prohibit corporations and individuals from engaging in bribery and require corporations to maintain accurate financial records. Facts and circumstances, including the applicable jurisdictions and whether a government official or entity was involved, will need to be examined. Beyond bribery, any other suspected illegal activity (e.g. fraud, price fixing with competitors, etc.) must also be evaluated. Illegal activity at a subsidiary can also have significant impact on a consolidated federal tax return. Any suspected illegal activity by a client, its affiliates or any of their personnel must be brought to the attention of the engagement partner or the appropriate service line leader, and to the quality group for your service line.

People and work environment

Respect in the workplace

A respectful workplace is one that affords employees equal opportunity to pursue their goals in an environment where people are collaborative and courteous with one another. Grant Thornton does not tolerate any form of employment discrimination, harassment or retaliation as defined under federal, state and local laws. In addition, we do not tolerate any workplace violence or bullying (whether verbal, physical or otherwise), including threats, threatening behavior, intimidation, or similar conduct.

Respect in the workplace applies to any situation where work is involved, whether in a Grant Thornton office, during business-related travel, at a client site, at a firm-sponsored event, or at any other location. At social gatherings among co-workers (which occurs when two or more co-workers gather whether or not firm-sponsored), people should continue to live our values and set a good example. Inappropriate or unprofessional behavior witnessed or experienced by co-workers outside of the office can also affect the work environment and the firm will hold people accountable as appropriate.

We believe in listening to one another and respecting different points of view. Our people thrive personally and professionally because all perspectives are valued and heard. Respect is one of our CLEARR values and we believe in treating each other in the same manner in which we would want to be treated.

Personal relationships

All personnel are expected to exercise good judgment in forming close personal relationships with others in the firm or with clients. Such close personal relationships can pose a conflict of interest, an independence problem for the firm and/or cause an appearance of impropriety to others. Accordingly, if a close personal relationship develops, it must be reported in a timely manner so that appropriate steps may be taken to resolve potential issues.



CLEARR¹ values

Respect

“Value our differences.”

Health and safety

The safety of our people and of the personnel of our clients and vendors is of the utmost importance to Grant Thornton. We provide a safe workplace in line with all applicable laws and regulations, to protect our people and our visitors insofar as they come into contact with foreseeable work hazards. Firearms and weapons are not permitted on the firm’s premises or any other work sites.

Alcohol, tobacco and drug use

In addition to other workplace hazards, alcohol, tobacco and drug use have the potential for posing health and safety risks to others. We recognize that there are circumstances in which the use of alcohol and tobacco may be acceptable in a work environment. However, we expect responsible behavior with respect to the use of alcohol and tobacco at work, when conducting firm business off-site, and at all firm-sponsored events. The use, transfer or possession of illegal substances is always prohibited.



Q&A

Question: I am an audit associate and recently began dating another associate in the tax practice in my same office. We do not work on any projects together and of course do not supervise each other's work. Do we need to tell anybody that we are dating?

Answer: Yes, you must notify your supervisor and human resources about the relationship. The firm needs to be aware of close personal relationships among co-workers in order to ensure that potential issues are prevented.

Question: A group of us, including two partners, went to a bar after a conference that we were attending out of town. At the bar, one of the partners made some derogatory comments about women and certain minority groups. Nobody spoke up to say that they disagreed because these two partners supervise our work. I was pretty offended by the comments and want to speak to somebody about this.

Answer: You should report your concerns to human resources or to another leader in your office. Grant Thornton does not tolerate offensive behavior and expressions, including those that are misogynistic and discriminatory in nature. This rule applies in the office and at off-site events with colleagues. We expect personnel to conduct themselves professionally and behave respectfully at all times when in the presence of clients and colleagues alike.

Question: We have a client engagement that requires significant on-site time. This client's culture and environment are very different from Grant Thornton's. Management regularly yells at our personnel, demands unreasonable deadlines and is disrespectful. Should I tell the engagement partner?

Answer: Yes you should, and the engagement partner should speak to the client's management. We do not tolerate disrespectful treatment of our personnel by clients. Further, we will not be intimidated into meeting any deadlines that cannot be met without satisfying our quality standards and applicable professional standards.

Question: One of my co-workers has "joked" on several occasions that he intends to hurt people (e.g. certain supervisors, individuals at the client etc.). It seems to happen whenever our team is under pressure to get a project done and we are working long hours. He did it again yesterday. Should I brush it off or tell somebody?

Answer: You should not ignore these types of comments. It is never appropriate to make comments about inflicting harm upon others. If a threat of violence occurs, it must be reported immediately to a supervisor, human resources and/or security.

Our firm and communities

Diversity

Grant Thornton values diversity. We have seen firsthand the power of bringing one's whole self to work — from different races, ethnicities, gender identities, nationalities, religions, generations, sexual orientations, backgrounds and experiences — and the dynamic and innovative environment that results. Simply put, at Grant Thornton, inclusion is a way of life. It permeates our culture, is embedded in our values and behaviors, attracts diverse talent and is a key enabler as we become the firm of the future.

Community involvement

We strongly support corporate social responsibility. We believe that each day presents an opportunity for us to share our human, intellectual, financial, and social capital in ways that engage our people, help clients, and create a better world for all. We have a national volunteer engagement program, which personnel are encouraged to participate in and record volunteer hours.

Grant Thornton also encourages personnel to serve on the governing board of non-for-profit and philanthropic organizations that are not firm clients. We want our people to contribute their best, not only in the office and with our clients, but also within our communities.

Political activities

Our people may voluntarily participate in political activities, including making contributions to candidates or parties, or supporting issues or causes of their choice. Prior to making a contribution or otherwise participating in any political activity, personnel must pre-clear it with the Political Compliance Help Desk. The Help Desk will advise whether such action can legally be taken and/or whether the firm has any contracts that prohibit the political activity. Failure to pre-clear any political activity can result in discipline.



CLEARly¹ values

Responsibility

“Be a steward: Leave things better than you found them.”

Unless participating in a firm-managed initiative involving issues of importance to Grant Thornton, individual political activity must take place on a person's own time. In doing so, personnel may not use their status as employees of Grant Thornton in support of a particular candidate, party or issue. In addition, pressuring other employees to make political contributions or to participate in support of a particular candidate, party or issue, either directly or indirectly, is not permitted.

No resources of Grant Thornton may be used directly or indirectly for any political purposes unless permissible under applicable law and approved in accordance with firm policy.

Use of firm resources and information

Each of us is responsible for protecting firm resources under our control, including information and files. We are expected to use the firm's resources and assets responsibly and in accordance with firm policies. Use of firm funds, property, equipment or other resources for personal benefit is prohibited. Firm resources, including equipment and supplies, may not be removed, sold, loaned or donated without appropriate approval. Each of us should take appropriate precautions to prevent theft, damage, misuse of or unintended access to firm resources and assets.

In addition, each of us must protect the confidential and proprietary information of the firm. Such obligations continue after an individual's employment with Grant Thornton ends.

Intellectual property

The firm's most valuable asset is our intellectual property — including the know-how we have in performing services for our clients. We must protect our know-how and other intellectual property and not share them with anyone outside of the firm. Use of the firm's intellectual property for personal benefit or any other unauthorized use is prohibited. Conversely, we must also respect the intellectual property rights of others. Using another party's trademark or copyrighted work without permission is prohibited.





Question: I am in the advisory practice and do not provide services to public sector clients. My friend is running for state representative in Ohio. My husband and I want to donate to and volunteer with her campaign. Do I have to do anything first?

Answer: Yes, you need to pre-clear your and your husband's contribution and volunteer efforts with the Political Compliance Help Desk. The fact that you do not serve public sector clients is not relevant. The Help Desk will check Ohio laws to ensure that personnel and their immediate family members are not prohibited from such activities. In addition, the Help Desk will review the firm's contracts and proposals pending in Ohio to ensure that they do not place any restrictions on these activities or require disclosure of them. Even if only your husband donates and/or volunteers, you will need to pre-clear these efforts. You can find a link to the Political Compliance Help Desk on the firm's intranet.

Question: I am active in a charity and am soliciting donations and volunteers. Can I use my work contact list to send emails to promote recognition for my charity? I will not pressure anyone into making a donation.

Answer: Firm resources may not be used for this purpose and such matters may not be conducted on firm time. If you have a personal relationship with co-workers or client contacts, you can use your best judgment in reaching out to them. However, you should use your personal email address instead and be certain that your email soliciting donations will not be offensive or unwelcome to the recipients.

Question: I have various social media accounts (e.g. Facebook, Instagram etc.) and post various comments on my own personal time. I have pretty strong political views and do not hold back on social media. Could this hurt me at work?

Answer: It depends. Personnel are expected to exercise good judgment and present themselves appropriately when participating in social media platforms whether corresponding via social media for work purposes or in a personal capacity. The use of social media sites for business purposes is encouraged with adherence to relevant firm policies.

While using social media sites, whether in a personal or work setting, personnel are expected to adhere to the following guidelines:

- Be responsible
- Follow applicable laws and regulations
- Uphold your professional reputation and the firm's reputation
- Respect professional standards and confidentiality obligations
- Be cognizant of the impact of providing location information
- Always be clear about your identity
- Be astute, authentic, and act with integrity
- Do not give business advice or make firm endorsements
- Remember that the internet is public and permanent

Question: I am the engagement partner for a client that prefers to work with men. Nobody at the client has ever said that directly, but the client has no women in senior positions. In addition, when female members on our team communicate with the client, the client responds to one of the male members of the team. Some guidance would be helpful.

Answer: As the engagement partner, you may need to speak to the client about cooperating in communications with the team. You should explain that our teams are composed of the best individuals for the job based on skills, experience, location etc. We do try to meet client requests related to staffing, but not ones that would compromise quality or our values. If the client prefers an all men staffing arrangement, the engagement partner should consult with firm management and consider potentially resigning from this client if an acceptable and non-discriminatory accommodation cannot be reached.

Guidance for ethical decision-making

In our jobs, we may be confronted with situations where the right course of action is not always clear. At a minimum, our actions and choices must be legal and in accordance with professional standards. However, as we all know, just because a choice is legal does not necessarily mean that it is ethical. When faced with a dilemma, we should ask ourselves the following questions:

- 1 **Do I feel good about my decision or actions?**
- 2 **Am I being asked to do something that doesn't feel right?**
- 3 **Do my actions, behavior and words demonstrate integrity?**
- 4 **Will my actions, behavior or words harm others?**
- 5 **Am I proud of the work I did and/or the work of my team?**
- 6 **How would I feel if others found out? Am I comfortable explaining?**
- 7 **Have I consulted with all the right people, and considered all the options?**
- 8 **Did I listen to other perspectives with an open mind before acting?**
- 9 **Am I setting a good example for others?**
- 10 **Is there a big picture that I did not consider?**



CLEARRly values

Agility

“Expand your perspective. See the big picture.”

In addition to asking the questions here, we should consult with others when the right ethical choice is not clear. Consultation can help identify issues and risks, eliminate unethical options and help find the best course of action in line with our CLEARR values. Seeking guidance is never the wrong thing to do.



Grant Thornton

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