

ClearStream Code of Conduct

No matter what the job, people make decisions every day that affect the Company and their co-workers. Sometimes circumstances can blur the line between right and wrong.

A Code of Conduct and Ethics policy sets out general statements of conduct and ethical standards for us to follow. This is to ensure that all employees in the ClearStream group of companies have a clear understanding of the company's expectations regarding their conduct and decision making at work. In this way, we will uphold our common values of:

- We are in the Relationship Business
- Commitment to Excellence is Our Standard
- Our Greatest Resource is Our People
- We make Responsible Decisions

Each employee has an obligation to report any conduct that may constitute an actual or suspected violation. The Company's "Whistleblower" policy provides more detail and direction on these matters.