

# CODE OF BUSINESS CONDUCT AND ETHICS

Restoring lives, businesses and communities.

## Message from Rohit Verma



### Dear Colleagues,

Crawford & Company has been hard at work restoring lives, businesses and communities for over 80 years. Showing up for our clients and customers on their hardest days is at the heart of everything we do. But there is another, equally important part of our history that we must live up to: integrity. In 1941, Jim Crawford's founded Crawford on three key principles:

1. Honesty and integrity above all.
2. Hard work pays.
3. Knowledge and creativity is power.

In large part, I attribute Crawford's long history of success to these guiding principles, and they still guide us today. It is no coincidence that honesty and integrity are at the top of Jim's list. How we do business is just as important as any measurement of financial growth. All of us—employees, officers, directors, and third-party business partners—are responsible for doing the right thing, everywhere and always.

I am pleased to introduce our Code of Business Conduct and Ethics, or "Code," which communicates the standards we are expected to uphold. Each of us has a responsibility to be familiar with our Code and the policies it references. If you find yourself in a situation you are unsure how to handle, I encourage you to seek guidance right away. Our first two RESTORE values, respect and empowerment, mean taking accountability for our actions and ensuring that we behave in an ethical way. This includes speaking up when we see something unethical or illegal and asking for help when we find ourselves in doubt. If there is an issue or concern, we need to know about it in order to take appropriate action and fix it. Rest assured that you will never face retaliation for any report you make in good faith—even if it turns out you were mistaken. We are all driven to make a difference at Crawford. By applying that same drive to our ethical commitments, we can continue to build and expand our culture of respect and integrity. I thank you for your part in continuing our ethical culture and business success, as these are critical to achieving our purpose.

Sincerely,

**Rohit Verma**

Chief Executive Officer

# OUR VALUES

Values support our mission, shape our culture and reflect traits important to Crawford & Company. They serve as the essence of our identity, helping us make good decisions and setting us apart as a global claims leader.

At Crawford, our values are used to continuously “RESTORE” the Company’s corporate culture:

## RESPECT

A culture where we practice integrity and ethical behavior, embrace each individual’s unique talents, honor diverse life and work styles, and promote a spirit of cooperation

## EMPOWERMENT

An engaged Crawford where employees are emboldened to advance the company mission, take ownership of their career progression, contribute ideas to meet industry challenges, and hold themselves and others accountable

## SUSTAINABILITY

A focus on corporate social responsibility, giving back and being good stewards in our communities

## TRAINING

An environment where employees are stimulated, knowledgeable and satisfied

## ONE CRAWFORD

A global mindset that’s inclusive, mission-focused, customer-focused and on the move

## RECOGNITION

An ecosystem of recognition and reward for our employees’ hard work

## ENTREPRENEURIAL SPIRIT

A shared passion to succeed, outpace competitors and innovate

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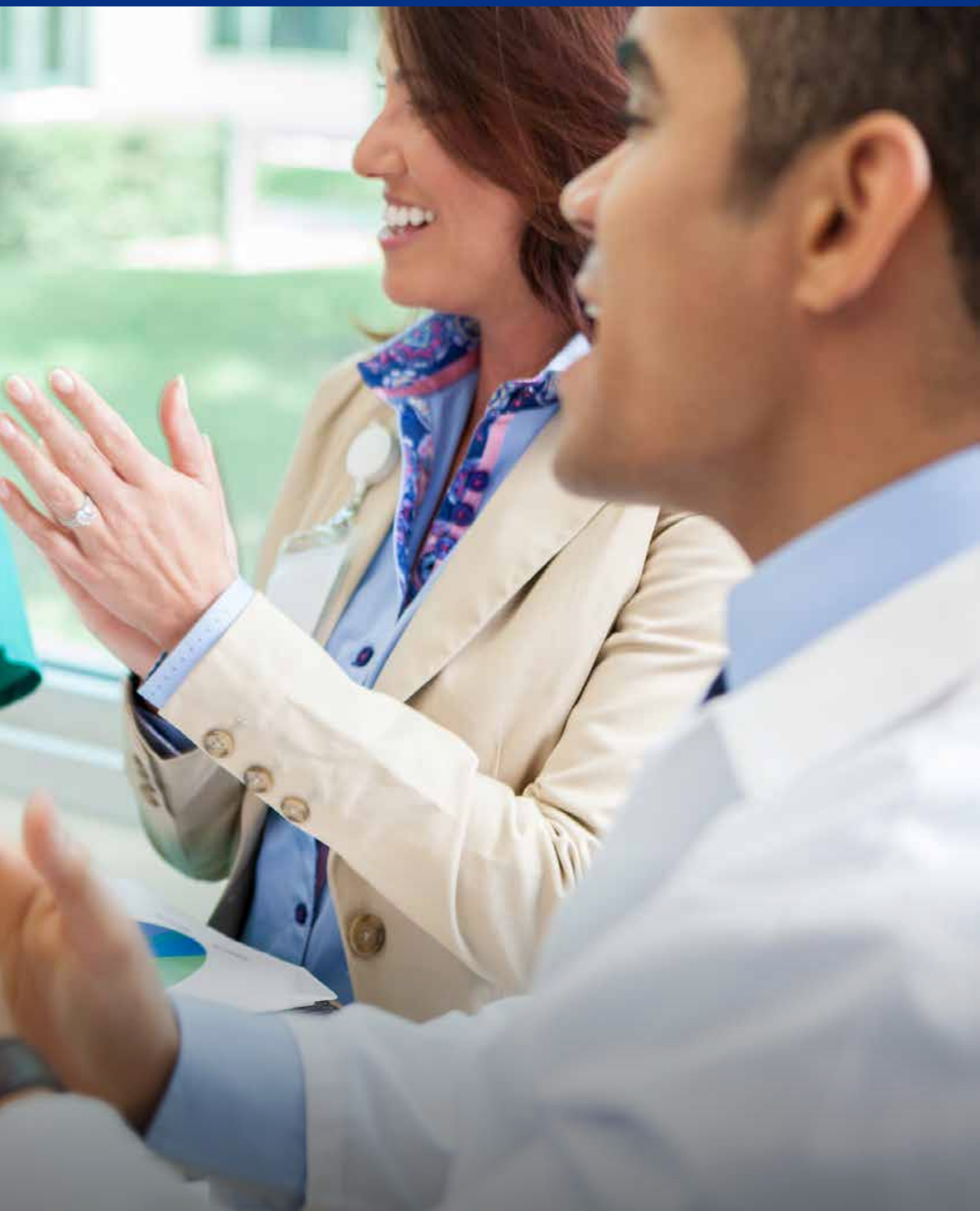
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A photograph of a smiling male doctor in teal scrubs with a stethoscope, sitting at a table and interacting with a patient whose hands are visible in the foreground. The scene is set in a bright, modern clinical environment with large windows in the background.

# RESPECT









# OUR CODE APPLIED

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## Putting Our Code into Practice

Ethics. Honesty. Integrity. Accountability. These are all words that come to mind when thinking about our Code of Business Conduct and Ethics (also known as our “Code”). While our Code describes how we are expected to conduct business for Crawford & Company (“Crawford” or our “Company”), it is so much more than just a set of rules—it is the Crawford way.

Our Code serves as a guide, helping us make sound business decisions so that we can uphold our Company values. By following our Code, we ensure that our decisions are ethical and comply with the laws and regulations that apply to the work we do. To further help us make good decisions, our Code references many of our Company Policies and Procedures, which contain additional guidance.

Although not common, you may occasionally find yourself in a situation where local law or custom conflicts with the guidance in our Code. In these cases, seek advice before taking action. You can speak to your manager or any other resource included in the *Speaking Up* section of our Code.

## Applying Our Code to Everyone

Each of us has a responsibility to follow the guidance provided in our Code, regardless of where we work or the job we do for Crawford. Accordingly, all employees, officers and directors—whether new to the Company or long tenured are provided with the Code as well as related training. Additional mandatory on-line training, including on our Anti-Bribery and Corruption Policy, as well as any new policies are conducted annually and completion rates are tracked. By following one set of standards we can ensure that doing the right thing is the same for everyone, which helps us all stay accountable for our actions and do business with integrity.

Our Code also applies to our third-party business partners, such as suppliers, associates, and contractors. If you oversee a third-party business partner, you must ensure that they are fully aware of and are following our Code at all times. If you have a question or concern about a third-party business partner's practices, seek guidance from your manager or any other resource included in the *Speaking Up* section of our Code.

### Example

Rachel is a Crawford adjuster. She was informed that a Contractor Connection contractor has been inflating their prices by charging customers for extra small services that they are not actually performing. It is only a small amount of money, and Crawford isn't doing anything wrong—but Rachel knows that she can't let this slide. She decides to tell her manager about what she knows.

→ Is Rachel making the right choice?



**Yes, she is.** At Crawford, we hold our contractors and other third-party business partners to the same standards we hold ourselves. To our customers, our contractors represent Crawford. Contractors need to act with integrity and honesty, just like Crawford employees. If you have concerns about a contractor's business practices, speak to your manager.

## Setting the Tone

Our Company counts on us to promote and exemplify a culture of ethics and compliance. You are expected to:

- Serve as ethical role models, making decisions consistent with the guidance set forth in our Code
- Foster a positive work environment and a strong culture of ethics, making Crawford a desirable place to work each day
- Treat all employees fairly and respectfully and cultivate an environment that encourages everyone to ask questions or raise concerns about possible misconduct

If a manager or team leader receives a question or report, they have a responsibility to address it promptly and escalate it as necessary. We must always keep an eye out for acts of retaliation, as there is no place for retaliation at Crawford.



# OUR REPORTING OBLIGATION

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## Speaking Up

The Company has a formal process for employees to raise questions or concerns about possible or actual misconduct. By speaking up you show your commitment to integrity and accountability—and you help our Company maintain a strong ethical culture. In turn, this ethical culture contributes to our business success and our Company's position as an ethical leader.

While we encourage you to first raise a matter with your immediate manager, if for any reason you do not feel comfortable or it might be inappropriate to do so, you can raise your concern through the following resources:

- Our Confidential EthicsPoint™ (phone and web based reporting system – instructions below)
- The Global Ethics Office
- The Human Resources Department
- The Legal Department
- An Executive Officer

To ensure we properly address and investigate complaints, Crawford put in place an Investigation Policy. That Policy includes:

- Violations or suspected violations involving Executive Officers or Directors will be reported to the Governance Committee of the Board.
- Violations or suspected violations relating to anyone other than Executive Officers or Directors will be reported the Chief Ethics Officer.

Depending on the allegation, an internal or external investigation may be conducted and, if appropriate, disciplinary action may be taken.





### EthicsPoint™ Instructions



Report using the Confidential EthicsPoint™ Web Reporting feature at the following website: [crawco.ethicspoint.com](http://crawco.ethicspoint.com)

Call the EthicsPoint™ using the numbers in the table below

Country	Phone
United States	800.854.3205
Outside the US (but not in the European Union)	800.854.3205*
UK & European Union	866.265.4222*

\*Refer to [www.business.att.com/bt/access.jsp](http://www.business.att.com/bt/access.jsp) for country-specific access code.

Our Confidential EthicsPoint™ is a third-party hosted telephone and web-based service that is available to ask a question or make a report of suspected misconduct. This service is available 24 hours a day, seven days a week, and reports can be made anonymously in any language. While Crawford welcomes anonymous reports through the Confidential EthicsPoint™, please be aware that making an anonymous report may limit the Company's ability to conduct a thorough investigation.

## Protecting the Reporter

Non-retaliation is more than just a word; it is a promise our Company makes to protect those who are willing to take action when they see something that does not seem right. Our Company is committed to protecting anyone who makes a report in **good faith** from any type of retaliation. If the Company becomes aware of retaliation taking place against an employee who, in good faith, reported a violation or suspected violation, the retaliating employee will be subject to an investigation that may result in disciplinary action, including termination, and appropriate legal action.

→ A report is made in good faith when the reporter believes the report to be true and provides all available information.

## What does retaliation look like?

Retaliation can be subtle and difficult to spot. Here are some forms that retaliation can take:

- Changes in responsibilities
- Rudeness or getting the “cold shoulder”
- Demotion
- Denial of vacation requests without justification
- Exclusion from professional development opportunities or special projects

While these actions are not always indications of retaliation, if you have reported a concern and are worried that the negative changes you are experiencing in the workplace might be connected, contact a resource listed in the *Speaking Up* section of our Code.

Crawford discretely investigates every report that is made, whether received in person or through our Confidential EthicsPoint™. Conducting investigations is necessary not only to correct the problem that is raised but also to make sure we avoid similar issues in the future.

A high-angle photograph of two construction workers on a steel rebar grid. One worker, wearing a red plaid shirt and a red hard hat, is in the foreground looking down at a set of blueprints. Another worker, wearing a light blue shirt and a blue hard hat, is partially visible in the upper right corner, also looking at the blueprints. The background shows the industrial structure of a construction site with wooden formwork and steel beams.

# ONE CRAWFORD











# OUR CUSTOMERS

## Delivering Excellence

Customers are why Crawford exists. At Crawford, we put our customers first, providing top-quality services promptly.

→ We use the term “customers” broadly to include both the clients that pay our fees and their customers, such as policyholders.

To foster our customer relationships, we all must ensure that we provide only the highest quality services that conform to contract requirements and our Company’s Policies and Procedures. If you have a concern about a customer relationship or customer satisfaction issue, make sure to discuss the situation with your manager right away.

## Treating Customers Fairly

We must always deal openly, fairly and honestly with all customers and speak truthfully about the services they can expect from Crawford. For those who work in marketing, advertising, sales and other customer-facing roles, this means the information we provide should be transparent, honest and in line with all applicable laws, regulations and Company Policies. At no time may we make misrepresentations or misleading statements about Crawford or any of our competitors. We may never take unfair advantage of our customers through any deceptive practices, such as concealing information or misrepresenting material facts.

## Competing While Maintaining Integrity

Although we should always do our best to retain clients, win new business and expand our Company's reach, we must do so in keeping with our commitment to integrity. Doing so requires that we always follow the antitrust and competition laws that apply to us. These laws aim to provide a level playing field in the marketplace, so that the public is provided with products and services at the most competitive price. In order to comply with the law and live up to our values, we must not enter into any agreement with a competitor or supplier that could improperly restrain or limit trade. It does not matter if the agreement or understanding is written or oral, expressed or implied, or whether it is formal or informal. What matters is whether it could be viewed, among other things, as an attempt to:

- Fix prices—that is, raise, lower or stabilize rates
- Illegally divide or allocate markets, territories or potential customers
- Limit the availability of products or services
- Encourage the boycott of a product or service
- Abuse market power

It is important to use caution when speaking with competitors, particularly at trade association meetings or similar events. In these situations, be sure that the conversation does not stray to anti-competitive topics.



If a competitor brings up a topic that you feel may violate competition laws, stop the conversation right away and notify the Ethics Office or the Legal Department.



For additional information, see our [Antitrust and Unfair Competition Policy](#).

**Example**

Danielle, a Crawford account executive, attended a trade conference last week. During the conference, she and Laura, a representative from one of Crawford's competitors, both agreed that business has been slow the past few quarters. Danielle has been thinking about their conversation, and she drafted the email below to send to Laura.

**D**

Hi Laura,

Great to meet you last week at the conference. I have been thinking about what we talked about—sales have been a little bit lower than expected recently. I was hoping we could chat about some pricing ideas I have that would help both of us turn it around. If we work together, I know we could find a solution.

Let me know what you think.

Danielle

→ Should she send it or delete it?



**Delete it.** We should never discuss any anti-competitive arrangement with a competitor, regardless of the means of communication. Even though Danielle was vague and did not suggest any specific tactics, even an informal agreement could constitute a violation of antitrust or competition laws. Besides, it is just unethical. We succeed based on our superior services, not by colluding with competitors.

## Dealing Fairly with Competitors

Part of acting with integrity in the marketplace requires that we treat our competition fairly, ethically and honestly. For those with job responsibilities that relate to collecting competitive information, we must be sure we do so using only legal and honest means. We may not share a competitor's confidential information without express permission. Respecting competitors' confidential information is one way that we demonstrate integrity and accountability.




Questions related to collecting and using competitive information should be directed to your manager or the Legal Department.



## Protecting Customers' Assets and Information

Customers and other third parties we work with often provide us with assets to use when we perform work on their behalf. We are obligated to protect these assets as we would Crawford's own, making sure to use them only for their designated business purposes and to protect them from theft, loss or waste.

Likewise, when a customer or third-party business partner provides information to us, we have a responsibility to safeguard it and use it appropriately. We may only share the information with others who have a business need to know it and are authorized to receive it. In addition, we must follow all data privacy and protection laws and Company Policies that apply to us.

If you have questions related to the use of information or other assets that belong to a customer or third-party business partner,  contact your manager or the Legal Department for guidance. See our [Global Data Protection and Privacy Policy](#) and other related Policies for additional guidance.



**Example**

Shaun is visiting several policyholders tomorrow regarding claims they filed, and he has not had time to print out the information he needs about each claim. He sends the files to his personal email account so he can print them at home this evening and be prepared for tomorrow.

→ Is Shaun's action appropriate?



**No, it is not appropriate.** You must never send any information related to Crawford business to your personal email account, an email account at another business with which you have a personal connection, or anyone who does not have a legitimate business need for the information. This rule applies even if the information is not confidential. Speak to the Legal Department or the Ethics Office if you have questions.

## Transacting with Government Agencies

For those involved in securing or working on government contracts, our Company's success depends on our compliance with additional laws, rules and regulations that only apply to this special group of customers. Remember to take great care when working on a government contract, since violating its terms could make our Company ineligible to work on such contracts in the future.

When interacting with government agencies, there are special rules relating to gifts, meals and entertainment. Please refer to the *Interacting with Government Officials* section of the Code for details.



# RECOGNITION











# OUR TEAM

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## Promoting Respect and Diversity

Our Company's workforce is its lifeline. We are all valued members of the Crawford team, and we all play a role in helping our Company and colleagues succeed. We bring our diverse backgrounds and talents to our work for Crawford, which helps us create innovative solutions for our customers. To embrace our workforce's diversity, our Company promotes equal employment opportunities for all employees and job applicants. As Crawford employees, we must also do our part to create an environment where everyone is treated fairly and respectfully.

In order to strengthen our culture of diversity, our Company does not tolerate any form of **discrimination** or **harassment**.

→ Discrimination arises when employment-related decisions are based on factors other than job requirements, individual qualifications and Company needs.

This means that employment-related decisions must be made without regard to race, color, religion, gender or sex, sexual orientation, gender identity, age, marital status, ancestry, national origin, citizenship, veteran or military status, handicap or disability, genetic information, medical condition, and any other classification protected by law. Employment-related decisions can include:

- Recruitment
- Hiring
- Terms of employment
- Placement
- Training
- Compensation
- Benefits availability
- Promotion
- Demotion
- Transfer
- Termination

We must also never tolerate harassment in the workplace. Common examples of harassment include:

- Inappropriate touching
- Unwanted sexual advances
- Inappropriate comments about another person's appearance
- Offensive jokes or remarks

→ Harassment is conduct that may be sexual or non-sexual in nature, which is intimidating, offensive or demeaning to another person.

Harassment not only is unlawful, but—more importantly—it also violates our Company values and simply has no place at Crawford. If you see or know of discrimination or harassment, make sure to report the situation right away to your manager, the Human Resources Department or our Confidential EthicsPoint™. You will never face retaliation for making a report in good faith.

## Ensuring a Safe, Drug-free and Fair Work Environment

We owe it to each other and to the communities in which we operate to maintain a safe working environment. We each play a part in this endeavor by making sure we follow all applicable laws, regulations and Company Policies and Procedures related to workplace health and safety. Violence, threats of violence and horseplay have no place at our Company and will not be tolerated.

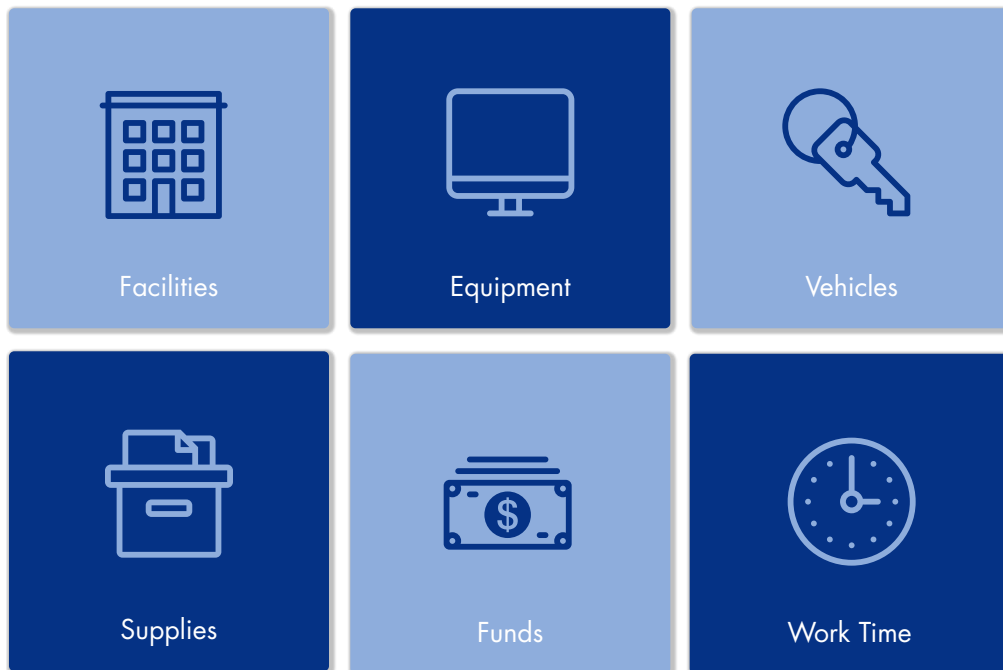
We are each accountable for maintaining a safe workplace, and we have a responsibility to report anything that does not seem right. If you become aware of a safety issue, notify your manager, the Ethics Office or the Legal Department right away.

In order to ensure a safe and healthy work environment, we must never work under the influence of alcohol, illegal drugs or misused over-the-counter or prescription medicine. In addition, we may never transport, possess or sell illegal drugs, or misuse prescription medications on Company property or while we are conducting business for Crawford. The only exception to this policy is when we consume alcohol in moderation and with good judgment at an authorized Company event.

For those whose job responsibilities include overseeing other employees, we must make sure to follow all labor laws in the locations where we do business. This includes providing fair compensation and reasonable working hours for everyone working on behalf of Crawford, whether they work directly for our Company or for a third-party business partner. Keep an eye out for indications of forced labor, and report any suspected issues to your manager, the Ethics Office or the Legal Department right away. Forced labor or unfair working conditions have no place at Crawford.

## Using Technology and Other Assets Appropriately

Each of us uses Company assets to perform our job responsibilities, and we must be careful to whom we provide access to Company property. While there are many different types of Company assets we may use on a routine basis, some of the most common ones include:



We must always make sure to protect Company assets from waste, misuse, loss or theft.



Technology assets are one of the most important types of assets our Company provides, and they deserve special mention. They include:



No matter how we use Crawford's technology assets, we must always follow all relevant Policies and Procedures. Do not share your passwords with others, and avoid opening emails or attachments from individuals outside our organization whom you do not know, or from whom you do not expect to receive an email.

 Refer to the [Information Security Policy](#) for additional information.

Limited personal use of our Company's assets is permitted. Nevertheless, this use should be minimal, ethical, legal and in line with Crawford Policies. When allowed by local law, our Company may monitor and disclose your use of any Crawford assets, including technology assets. Therefore, you should have no expectation of privacy when using them.

**Example**

Jorge receives the following email from an email address he doesn't recognize:



Hi Jorge,

I spoke to your boss, Angelica, and she said you would be interested in this article about potential changes in the insurance industry. Click here to download the article: [Insurance article](#).

Take a look and let me know what you think.

Thanks,

Miguel Ramirez

The fact that the sender knows Jorge's boss's name and the industry he works in makes him think that this email might be legitimate, but he is still unsure about downloading an article from someone he doesn't know. He decides to talk to his manager and the IT Department about the email.

→ [Is he doing the right thing?](#)



**Yes, he is.** Jorge doesn't know the sender, and the file could easily include a virus or other malware. The fact that the sender knows the name of Jorge's boss and the industry he works in means that it is likely not standard junk mail. Jorge's manager and the IT Department can help him respond appropriately to this suspected phishing attempt.



## Protecting Personal Information

For some of us, our job responsibilities give us access to personal information about our coworkers, such as home address, national identification or Social Security number or medical or banking information. This information may be used only for the purpose it was collected, and our use must align with all applicable data privacy laws. At no time may this information be shared with another person who does not have a business reason to know it or who is not authorized to receive it.



More information regarding data protection can be found in our [Global Data Protection and Privacy Policy](#).





# ENTREPRENEURIAL



**L SPIRIT**

# OUR REPUTATION AND BRAND

## Safeguarding Confidential Information and Intellectual Property

As a global industry leader, we must carefully protect and secure **confidential information** and/or “proprietary information” entrusted to us.

→ Confidential information includes any information of a restricted or secret nature belonging to our Company, customers, third-party business partners or competitors.

There are many types of confidential information. Some of the most common examples include:

- Financial forecasts and other nondisclosed financial information
- Business plans and strategies
- Employee information
- Personal information regarding customers
- Technical information
- Information about our clients
- Terms and conditions, rates or fees offered to clients





Some of this information may be considered a **trade secret**.

→ A trade secret refers to information that gives Crawford a competitive advantage. We must be careful with this information, ensuring that we never accidentally disclose it, or leave it where others may find it.

Our Company's confidential information is one of its most important assets, and it is key to Crawford's innovation, success and high standards of customer service. We must be careful never to share confidential information with others unless there is a business need to do so. Take special care to avoid accidentally disclosing this information, and avoid discussing it if there is a chance you can be overheard, particularly in public places.

We have a similar responsibility to protect our Company's intellectual property, sharing it only as needed. Intellectual property can include our Company practices, technical data, research and processes, trademarks, copyrights, service marks and patents. Crawford's intellectual property also includes all works and inventions of its employees. That means anything we create during the course of our work for Crawford that relates to or is used in Crawford's current or prospective business or operations belongs to our Company. This is true whether it is developed on or off Company premises, individually or jointly with others or during or outside of working hours.

Just as we must protect Crawford's intellectual property, we must also safeguard intellectual property that belongs to third parties. If you have access to third-party intellectual property as part of your work for Crawford, use it only as allowed and in line with any agreement in place with its owner.

Keep in mind that your obligation to protect our Company's confidential information and intellectual property continues even after your employment with Crawford ends. If you have any questions regarding the use of confidential information or intellectual property, contact the Ethics Office or the Legal Department.



## Responding to the Media and Analysts

The way that Crawford is perceived by the public is as important as the quality of the work we do. For this reason, we must always protect our Company's reputation for providing quality service. We do this by providing clear and consistent information that presents our Company in a truthful light, highlighting our business' success and our culture of integrity. If a member of the media asks you for information about the Company, refer them to our Marketing and Communications Department. Similarly, if you receive a request for information from a financial analyst, refer the request to our Chief Financial Officer. In either circumstance, you should not provide the requested information unless you are authorized to speak on Crawford's behalf.



For more information about responding to the media or a financial analyst, refer to our [Regulation Fair Disclosure Policy](#).



## Using Social Media

While Crawford recognizes each employee's right to participate in social media platforms, we must always exercise caution when speaking about matters related to our Company or its business on our personal social media pages. In your online activities, make sure not to disclose information that could be considered confidential. Also, if you identify yourself as a Crawford employee, contractor or third-party business partner, you should add a note that your posts reflect your own personal opinions and do not represent our Company's views.



More information about the use of social media can be found in our [Global Social Media Policy](#).



**Example**

Samantha is a claims adjuster, and one of the claims she is working on happens to involve a popular local news anchor. She writes the following status update for her social media page:



You'll never guess who ran a red light and wrecked his car—Jimmy McMann from Channel 5 News! Crazy, huh?

After some thought, she decides not to post it on her social media page because she's not sure if it's in line with Crawford's commitment to protecting confidential information.

→ **Did she do the right thing?**

- A.** No. Jimmy McMann is a public figure, so this isn't confidential information. It would have been fine to post this online.
- B.** Yes. We should not share information about claims online, even if they involve a public figure.
- C.** Yes. We should never post any information about work on social media.



**The correct answer is B.** It is fine to mention general aspects of work on social media, but we should never give out information about a claim, no matter who is involved. Be careful of what you post on social media. You never know who is reading or listening. Contact the Ethics Office if you have questions or concerns about the appropriate use of social media.

A blurred background image of a modern building with a glass facade and a concrete railing in the foreground. A person's arm is visible on the right side, leaning on the railing.

# EMPOWERMENT







# OUR COMMITMENT TO CRAWFORD'S BEST INTERESTS

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## Identifying and Avoiding Potential Personal Conflicts of Interest

To maintain our culture of integrity, each of us has a responsibility to always act in our Company's best interest. Failing to do so could create legal and reputational risk—not just for our Company, but also for us as individuals. For this reason, we must be committed to identifying, managing and avoiding any **personal conflict of interest** situations.

→ A personal conflict of interest arises when our personal or family interests interfere with the decisions we make on behalf of Crawford.

When determining whether or not a conflict exists, we must make sure to consider not only our own activities, but also those of family members and significant others. Conflicts can arise when we face a choice between acting in our Company's best interest and acting in a way that would benefit us individually or a personal contact.

At times, our family or personal relationships could lead to a conflict of interest. Personal conflicts of interest to disclose include:

- A personal relationship with someone in a position to influence your salary, performance evaluations, promotions, career developments or similar matters
- A personal relationship between a manager and someone in their direct or indirect reporting line.
- A personal relationship with someone of influence who works for a third-party business partner or a competitor



For more information, refer to the [Global Conflicts of Interest Policy](#)

Similarly, conflicts of interest can also be financial in nature. For this reason, you should avoid:

- Outside employment, such as with a client, third-party business partner or competitor
- Owning or holding a significant financial interest in a company that competes or seeks to do business with Crawford
- Taking advantage of an opportunity that arises from your work for Crawford, or otherwise uses Company property, information or your position for personal gain

If you are facing a possible conflict of interest, speak to your manager, the Human Resources Department or the Ethics Office. Reporting and resolving conflicts of interest helps us do what is best for Crawford, and it is one more way that we demonstrate integrity.



## Identifying and Reporting Operational Conflicts of Interest

We must also be watchful for **operational conflicts of interest**.

→ An operational conflict of interest could arise when Crawford represents competing interests, such as two clients on opposite sides of a claim.

If you believe you have identified a potential or actual operational conflict of interest, speak to your manager or the Ethics Office immediately.



Additional information regarding operational conflicts of interest can be found in the [Conflicts of Interest Policy](#).



**Example**

Seungwoo is working on a property claim and notices that another Crawford adjuster in a different office is processing the claim for the other party involved.

→ What should Seungwoo do?

- A. Nothing; he has never even met the other adjuster, and as long as they both do their jobs right, the claim will get processed correctly and fairly.
- B. He should tell his manager, as this might be a conflict of interest for Crawford.
- C. He should call the other adjuster and explain to her what is going on, so they both know to be extra careful.



**The correct answer is B.** Even though Seungwoo and the other adjuster are probably capable of processing the claim without bias, it still represents a potential operational conflict of interest for Crawford. Seungwoo should speak to his manager in order to make sure that any actual or potential conflict is handled correctly.

Each of us has a responsibility to avoid even the *appearance* of a conflict of interest. If you think you could be involved in a conflict of interest situation, make sure to disclose it right away. Disclosing actual or potential conflicts allows our Company to help resolve the circumstance and avoid real or potential harm. It also upholds the shared commitment to integrity and honesty that underlies our work. Always remember, being involved in a conflict of interest situation is not necessarily a violation of our Code—but failing to disclose it is.

## Exchanging Appropriate Gifts, Meals and Entertainment

Exchanging business courtesies—such as gifts, meals and entertainment—helps us build strong business relationships with our customers and third-party business partners. Nevertheless, exchanging business courtesies is an area where conflicts of interest can easily arise. Any business courtesy that you offer or accept must always be:

- Reasonable, customary and common both in our industry and where we do business.
- Of modest value.
- Infrequent.
- Unsolicited.
- Not cash or a cash equivalent (such as a gift card or gift certificate).

If you receive a gift or an offer of entertainment that does not follow the guidelines provided above and you feel uncomfortable refusing it, contact the Ethics Office right away for assistance.



Additional information about exchanging business courtesies can be found in our [Gifts, Meals and Entertainment Policy](#).





Take a look at the chart below for some examples of appropriate and inappropriate business gifts and entertainment.

### Appropriate

### Inappropriate

A casual lunch at a modestly priced restaurant

Two airline tickets to Hawaii for a client and their spouse

A branded flash drive with Crawford promotional materials

A gift card to a coffee shop

A small gift basket to celebrate a holiday

A year-long subscription to a "wine of the month" club

## Interacting with Government Officials

When we work with government officials on Crawford's behalf, we need to follow more restrictive rules regarding gifts, meals and entertainment. Our Company prohibits directly or indirectly offering anything of any value to a government official or a member of a government official's family.



More information about interacting with government officials can be found in the Anti-Bribery and Corruption section of our Code, as well as our [Anti-Bribery and Corruption Policy](#).



# TRAINING







# OUR BUSINESS PRACTICES

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## Complying with Laws and Regulations

Crawford is a global business, with offices and customers in countries around the world. No matter where we work or where our customers are located, we must do business according to the law and our Company's values. Never take illegal or unethical shortcuts or try to grow our business by going outside the bounds of the law. In short, make sure that in all of your business activities, you act with honesty and integrity in order to obtain results of which we can truly be proud.

## Anti-Bribery and Corruption

As part of our commitment to doing business honestly, our business practices must always be transparent and free from the influence of bribery and corruption. All of us, no matter what work we do for Crawford, must make sure to follow all anti-bribery laws and regulations that apply to us. These include the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act, the Australian Criminal Code, the Anti-Money Laundering and Counter-Terrorism Financing Act 2006, and the Brazilian Clean Companies Act. In general, these laws and regulations state that we may not offer, attempt to offer, authorize, promise, solicit or accept any sort of **bribe** or **kickback** in order to obtain or retain a business advantage.

→ A bribe is an offer, promise, or gift of money or anything of value (such as favors, offers of employment or entertainment) that is made with the intention of influencing a person in the performance of his/her role in order to obtain an improper business advantage.

→ A kickback is the return of a sum already paid (or due to be paid) as a reward for making or fostering business arrangements.

We must be especially vigilant when we work with **government officials**, whether they are domestic or foreign.

→ A government official is any officer or employee of a government or any department or agency, or any person acting in an official capacity.

Some examples include:

- Elected officials
- Officers or employees of a government or any department or agency
- Anyone acting in an official capacity
- Employees or associates of government owned or controlled companies (such as public universities, hospitals, utility companies, or housing authorities)
- Political candidates
- Political party officials
- Employees of international organizations, such as the United Nations
- Members of royal families

When we work with government officials, not only should we never offer or solicit any bribe or kickback—but we should never even give the impression that we are doing so (see the *Interacting with Government Officials* section of the Code). We should conduct Crawford business without any hint of impropriety. Whether we are working with a government official or a private company, we must always conduct business ethically and without corruption.

At times, we may be asked to make a **facilitation payment**.

→ A facilitation payment, also known as a “grease payment,” is a payment to a government official, usually made in cash, in exchange for a routine government service, such as the issuance of a license, permit or visa.

While facilitation payments may be customary in some countries where we do business, the U.K. Bribery Act and the Brazilian Clean Companies Act consider them to be bribes, and our Company prohibits such payments anywhere.

The consequences for violating bribery and corruption laws are severe, both for the individuals involved and for our Company. If you have been asked for or offered a bribe, report the situation right away to the Legal Department. Remember that it is not just Crawford employees who must uphold our commitment to integrity—our third-party business partners must also steer clear of bribery and unethical behavior.

❓ For more information, see our [Anti-Bribery and Corruption Policy](#).

### Example

Yuri is working with a new client to establish contract terms. Natalia, the client representative, wants to negotiate for a lower than usual price. If he gets it done, she says she will provide Yuri with a cash payment once the contract is signed.

→ What should Yuri do?

- A. Refuse the offer and tell the Legal Department.
- B. Accept the money. He can give it to Crawford to make up the difference in pricing.
- C. Keep the money for himself to make up for the extra time he has spent working on this deal.



**The correct answer is A.** Yuri needs to refuse the payment and speak to a member of the Legal Department as soon as possible. This kickback is an example of bribery, and we never engage in any kind of bribery or corruption. We need to follow the law and our values at all times.





## International Trade

As a responsible business, we must know and comply with the international trade laws that apply to our work. This includes the laws that regulate the import and export of products, technologies, software and technical information to or from countries that are subject to trade controls. Export and import activity can take place in any location, and can be either intangible (such as through email, discussions or presentations) or tangible (such as through the mail or by handing an item to someone). When we provide information or other material to anyone, we need to be sure that they are eligible to receive it. It is up to us to know and follow the trade laws that apply to us—and to ask questions if we are not certain. Just as we are unable to trade with ineligible persons, entities or countries, we may not ask a third party to take part in this activity on our behalf.

Diligently following import and export laws is key to our business success. Taking part in import or export activity without the appropriate government approvals can lead to the loss of our Company's import and export privileges, as well as civil and criminal penalties for both the individuals involved and Crawford. For guidance on trade controls, please contact the Legal Department or the Ethics Office.

In addition, we must follow U.S. anti-boycott laws that prohibit us from participating in unsanctioned foreign **boycotts**.

→ A boycott is a situation where one person, group or country refuses to do business with certain people or countries.

It is not always easy to identify requests to participate in a boycott. They may be spoken or written, and they are often found in proposals originating from countries that support the boycott. No matter what form they take, we can never agree to any unsanctioned boycott. Violations of U.S. anti-boycott laws are serious and can lead to civil and criminal penalties. If you receive a suspected request to participate in an illegal boycott, report it to the Legal Department or the Ethics Office. Keep in mind that it is not enough to simply ignore or refuse the request, as even this may be treated as a violation of anti-boycott laws.

**Example**

Jena is negotiating a contract to sell our services to an Egyptian organization. When reviewing a draft of the contract, Jena notices that the potential customer has added a section that requires us to limit our business in Israel.

→ What should Jena do once she sees this new section?



Jena must immediately involve her manager and the Legal Department as soon as she notices this language in the contract. If she does not report the potential customer's change to the contract, she and Crawford may face certain penalties under anti-boycott laws. Jena's manager and the Legal Department will help her find the best way to handle this situation.





## Economic and Trade Sanctions

Several countries have watch lists in place that forbid our Company from doing business with certain people, companies, industries and countries that might be involved in illegal activities. When we engage in a business transaction, we must work with the Ethics Office to ensure the party we are doing business with is not on a watch list.

### Example

Joanna added a new customer to the claims system. The Ethics Office notified her that the claim information was screened against economics and trade sanctions watch lists and needs to be held for further review. Joanna did not process the claim payment.

→ Did she make the right choice?



**Yes.** The Ethics Office first needs to ensure that any potential issue is handled correctly. If Joanna receives confirmation that the customer is not on the watch list, she may proceed with the payment.

## Anti-Money Laundering

Each of us is expected to do our part in recognizing, preventing and reporting **money laundering**.

→ Money laundering is any attempt to make illegally acquired funds appear legitimate, or “wash” money from criminal or terrorist activities. Usually, this is accomplished through various transactions that make the money seem legitimate or “clean.”

We can help prevent money laundering by conducting appropriate due diligence of potential third-party business partners with whom we do business. By conducting due diligence, we can ensure that the funds used in a financial transaction come from legitimate sources.

We also help prevent money laundering by keeping an eye out for signs of illegitimate or illegal business activities from anyone with whom we do business. These signs may include evidence of criminal activity at locations we visit in connection with a claim, the involvement of parties who do not seem directly connected to a claim or transaction, or payments to parties or countries that are not connected to a claim or transaction. If you suspect any such activity, make sure to seek help by contacting the Legal Department, the Ethics Office or a Money Laundering Reporting Officer.

## Insider Trading

At one time or another, each of us is likely to come into contact with **inside information** about Crawford or another company with which we do business.

→ Also known as “material non-public information,” inside information is information that is not known by the public that a reasonable investor would likely consider important when deciding to buy, sell or hold a company’s stock.

Inside information can be positive or negative in nature. It commonly includes:

- Financial results, forecasts and plans
- Major personnel or management changes
- Significant lawsuits, disputes or government investigations
- New products, services or processes
- Possible acquisitions, dispositions, joint ventures and other major transactions
- The gain or loss of a significant customer or supplier

Even if such information is publicly disclosed, it is still considered non-public unless enough time has passed for the investing public to absorb the information. At Crawford, we allow for two full trading days after the release of information until it is considered public in nature.

We must make sure never to use inside information for personal benefit, particularly when making investment-related decisions. Likewise, we may not help others benefit from inside information through **tipping**.

→ Tipping occurs when we provide inside information to anyone who does not have a business need to know it.

Providing a tip is a violation of insider trading laws and our Company's Policies, and it could have serious criminal consequences for Crawford and for us as individuals, even if we do not make a trade ourselves. Additionally, it does not live up to our commitment to integrity and honesty.

Insider trading laws can be complex. If you have a concern about how to use inside information, make sure to seek guidance from the Legal Department. Those who serve as a director, officer or specially designated employee should contact the Legal Department for advance approval of a trade in Crawford stock.



Further information regarding insider trading can be found in our [Insider Trading Policy](#).

## Maintaining Proper Business Records

Our Company's business records are key assets, and they must be complete and accurate in order for Crawford to succeed. Business records include, but are not limited to:



Expense Reports



Time Records



Invoices



Service Records



Ledgers



Reports to  
Government Agencies



Our Company, investors and other stakeholders rely on our records to make good financial decisions and to create our financial disclosures; therefore, we must always be certain that these business records are complete, accurate, timely and truthful.

Those who work on Crawford's financial disclosures hold special responsibilities. We must ensure that our Company's disclosures are full, fair, timely and understandable. If you work on Crawford's financial disclosures, you should always follow all related Policies and Procedures, generally accepted accounting principles and any legal requirements.

## Responding to Audits and Investigations

As part of our work at Crawford, we may be asked for information that is subject to an audit or investigation. If the request is part of a routine audit or investigation and relates to your normal job responsibilities, you should cooperate fully, providing accurate, complete, timely and truthful information. If the audit or investigation is not routine or is not within your normal job responsibilities, immediately contact the Ethics Office or the Legal Department. If possible, provide the name and contact information of the person who made the request.

Never conceal, alter, misrepresent, destroy or hide information or records relating to an audit or investigation. You must preserve any and all records related to such request until you are notified that they are no longer needed.

## Record and Information Management

We must make sure we follow our Company Procedures and the law when it comes to maintaining and destroying records.



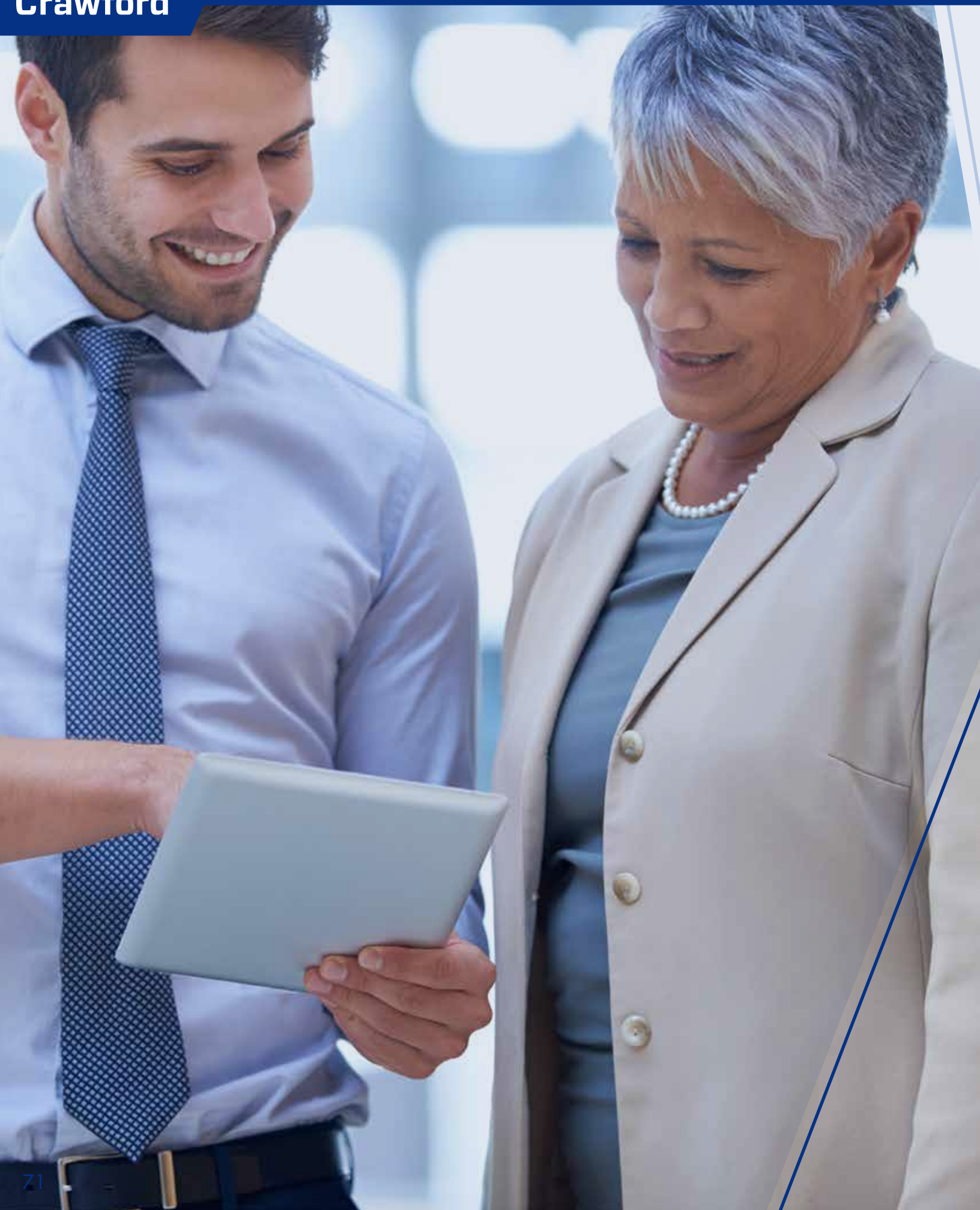
Be sure to retain and destroy records in accordance with our [Records and Information Management Policy](#).

A close-up photograph of two hands, one from a person in a white lab coat and another from a person in a grey suit, gently cupping a small amount of dark, rich soil. The background is blurred, focusing attention on the hands and the soil.

# SUSTAINABILITY







# OUR CORPORATE SOCIAL RESPONSIBILITY

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## Protecting the Environment

As part of being a responsible corporate citizen, Crawford does its part to protect the environment in the communities where we live and work. We must always have an eye towards sustainability, making every effort to use natural resources wisely, and we must also ensure that our Company follows all related laws and regulations. You should report any suspected problems or issues to your manager or to the Ethics Office right away.



## Supporting Charitable and Political Organizations

Crawford has a proud history of donating our skills, time and money to help others. Collectively, we have made a positive difference in our communities through volunteer work and charitable giving. When we engage in corporate charitable activities, we want to make sure we do so in a manner consistent with our Company values. Discuss with your manager concerning approval of any Company funds, time or assets that will be contributed to a charity. If we engage in volunteer activities on our own time, we should be careful not to give the impression that we are representing Crawford.

Due to the stringent laws governing corporate political contributions, we may not make contributions to a political party or candidate in Crawford's name. Likewise, we may not seek reimbursement for our personal contributions. If Crawford chooses to make a political contribution, it must be approved in advance by our Chief Executive Officer and General Counsel.

We also need to be careful when interacting with regulators, legislators or executive branch officials, as this could be considered lobbying. Before engaging in any such activity on Crawford's behalf, you must first speak to the Legal Department to determine if any disclosure, registration or other rules apply.



# WAIVERS

We are all held to the same expectations, and the commitment to do what is right under our Code. That is why we all certify upon hire and again each year that we will comply with the Code. In certain extraordinary situations, however, a waiver of a provision of this Code may be granted.

Any waiver of the Code for an employee, officer or member of our Board of Directors may be made only by the Company's Board of Directors. Contact the Ethics Office if you have any questions. Any waiver must be promptly documented and disclosed to shareholders as required by law or applicable stock exchange listing standard.

# REPORTING RESOURCES

Call the EthicsPoint™ using the numbers in the table below

Country	Phone
United States	800.854.3205
Outside the US (but not in the European Union)	800.854.3205*
European Union	866.265.4222*

\*Refer to Appendix for country-specific access code.

Our Confidential EthicsPoint™ is a third-party hosted telephone and web-based service that is available to ask a question or make a report of suspected misconduct. This service is available 24 hours a day, seven days a week, and reports can be made in any language. While Crawford welcomes anonymous reports through the Confidential EthicsPoint™, please be aware that making an anonymous report may limit the Company's ability to conduct a thorough investigation.

# POLICIES

## **Anti-Bribery and FCPA Compliance Policy**

<https://us.crawfordandcompany.com/media/2400994/anti-briberyandfcpacecompliancepolicy.pdf>

## **Antitrust and Unfair Competition Policy**

<https://us.crawfordandcompany.com/media/2401002/antitrustandunfaircompetitionpolicy.pdf>

## **Global Data Protection and Privacy Policy**

[https://us.crawfordandcompany.com/media/2400998/global-data-protection-and-privacy\\_english.pdf](https://us.crawfordandcompany.com/media/2400998/global-data-protection-and-privacy_english.pdf)

## **Insider Trading Policy**

[https://us.crawfordandcompany.com/media/2339060/insider\\_trading\\_policy\\_final\\_oct\\_2017.pdf](https://us.crawfordandcompany.com/media/2339060/insider_trading_policy_final_oct_2017.pdf)

## **Gifts, Meals and Entertainment Policy**

<https://us.crawfordandcompany.com/media/2192794/gifts-meals-entertainment-policy-en.pdf>

## **Global Third Party Risk Management Policy**

<https://us.crawfordandcompany.com/media/2338714/global-third-party-risk-management-policy-oct2017.pdf>

## **Global Information Classification and Handling Policy**

<https://us.crawfordandcompany.com/media/2401006/global-information-classification-policy.pdf>

## **Global Records & Information Management Policy**

[https://us.crawfordandcompany.com/media/2401010/records-and-information-management-policy\\_final.pdf](https://us.crawfordandcompany.com/media/2401010/records-and-information-management-policy_final.pdf)

## **Regulation Fair Disclosure Policy**

<https://us.crawfordandcompany.com/media/2339068/regulationfairdisclosurepolicy.pdf>



# POLICIES

## **Crawford Global Event and Audit Log Management**

<https://us.crawfordandcompany.com/media/2401014/crawford-global-event-and-audit-log-management-final.pdf>

## **Crawford Global Vulnerability Management**

<https://us.crawfordandcompany.com/media/2401018/crawford-global-vulnerability-management.pdf>

## **Global Information Security Policy**

<https://us.crawfordandcompany.com/media/2264081/global-information-security-policy.pdf>

## **ICT Policy Risk Management**

[https://us.crawfordandcompany.com/media/2401022/global-ict-policy-it-risk\\_management.pdf](https://us.crawfordandcompany.com/media/2401022/global-ict-policy-it-risk_management.pdf)

## **Social Media Policy**

<https://us.crawfordandcompany.com/media/2402692/social-media-policy.pdf>

## **Conflicts of Interest Policy**

<https://us.crawfordandcompany.com/media/2402696/conflicts-of-interest-policy.pdf>