

Gifts, Meals and Entertainment Policy

Introduction

A conflict of interest exists when a personal interest interferes with or gives the appearance of interfering with, an employee's ability to make a sound business decision. When a Crawford & Company® employee receives or gives Gifts or Meals and Entertainment which are not reasonable, customary, and common in our industry and the locations where we do business, a conflict of interest may exist.

Policy

Crawford & Company® ("Crawford" or the "Company") *prohibits* the giving or receiving of gifts, promotional items, travel and accommodations, honoraria, or other benefits (collectively referred to as "Gifts") and Meals and Entertainment for the purpose of securing an improper advantage or otherwise inappropriately influencing the recipient. While the giving and receiving of modest and infrequent Gifts or Meals and Entertainment may be acceptable, Crawford *prohibits* the giving of Gifts or Meals and Entertainment of any kind or of any value to Government Officials, Government Entities, or to their families directly or indirectly and to members of Government Entities. If Government Officials or members of a Government Entity solicits or requests a favor or a thing of value, it must be declined.

This Policy applies to the giving and receiving of Gifts or Meals and Entertainment with any client, customer, supplier, vendor, associate, or other business agent (collectively referred to as "third parties") with whom Crawford has a current or potential business relationship.

General Criteria

Employees are expected to exercise sound judgment in the giving and receiving of Gifts or Meals and Entertainment. Employees are *prohibited* from asking for or in any way soliciting Gifts, or Meals, and/or Entertainment.

In general, the following Gifts or Meals and Entertainment are *not permitted* to be given or received:

- Anything that can be considered a bribe, payoff or kickback (i.e., in order to obtain or retain business or to secure an improper advantage) or that creates the appearance (or an implied obligation) that the giver is entitled to preferential treatment, an award of business, better prices, or improved terms of service;
- Anything of cash or cash equivalent, such as a gift card or gift certificate

Gifts, Meals and Entertainment Policy

- Anything that is prohibited by local law or by local management
- Anything that would likely embarrass Crawford or the other party if it became public (e.g., “adult” entertainment or any sort of event involving lewd behavior)
- Anything that the gift-giver or gift receiver knows is prohibited by either parties organization
- Anything provided to family members of third parties
- Anything that is not reasonable, customary, and common for the industry (i.e., anything extravagant or lavish)

Use of Personal Funds

Gifts or Meals and Entertainment paid for by an employee without reimbursement by the Company is still subject to the requirements of the Policy.

Specific Rules Applying to Gifts (Non-Government Officials)

In the context of this Policy, Crawford permits Gifts to be given to or received from third parties (non-government officials), provided the Gifts meet the General Criteria above *and* are:

- Of modest value. If the value exceeds US\$250 (or local equivalent) per gift, it is an exception to the Policy and must be approved in advance by the appropriate GEM team member.
- Infrequent.

Examples of Gifts include, but are not limited to Crawford promotional items; flowers or small trinkets to celebrate a birthday, retirement or other event; Chinese New Year items; and items for third party employee appreciation or promotional events. No cash or cash equivalents can be given or received.

Travel

No unreimbursed travel should be offered to or received from a third party.

Speaking Engagements

Speaking engagements or panelist participation at industry or Company conferences may be ordinary and customary. In such instances, the giving or receiving of reasonable expenses, such as hotel, accommodations, honoraria, and waiver of conference fees, may be permitted if approved in advance by the appropriate GEM team member.

Gifts, Meals and Entertainment Policy

Specific Rules Applying to Meals and Entertainment (Non-Government Officials)

In the context of this Policy, Crawford permits Meals and Entertainment to be given to or received from third parties (non-government officials), provided the Meals and Entertainment meet the General Criteria above *and* are:

- Of modest value. If the value exceeds US\$250 (or local equivalent) per participant, it is an exception to this Policy and must be approved by the appropriate GEM team member.
- Infrequent.

Examples of Meals and Entertainment include, but are not limited to, non-lavish meals and sporting or entertainment events in which a Crawford employee is physically present to host. If a Crawford employee does not attend the meal or entertainment event, it is considered a Gift and subject to the Specific Rules Applying to Gifts outlined above.

Government Officials and Government Entities.

This section must be considered in the context of this Policy. Some content from other sections may be repeated for absolute clarity.

Reference should be made to the Anti-Bribery & Corruption Policy.

No Company officer, employee or agent shall bribe or offer to bribe, or accept or offer to accept a bribe from, any person or to offer payments or anything of value to a Government Official or a member of a Government Entity to induce that individual to affect any act or decision in a manner that will assist the Company or any of its subsidiaries or divisions to obtain or retain business. Furthermore, every officer, employee and agent is obligated by Company policy and applicable law to keep books, records, and accounts that accurately and fairly reflect all transactions and disposition of Company assets.

Crawford *prohibits* the giving of Gifts or Meals and Entertainment of any kind or of any value to Government Officials or to their families either directly or indirectly. Crawford also prohibits giving Gifts or Meals and Entertainment of any kind to any members of a Government Entity. If a Government Official or a member of a Government Entity solicits or requests a favor or a thing of value, it must be declined.

The only exception to the prohibition is where select jurisdictions allow infrequent and modest subsistence incidental to a scheduled (and so evidenced) meeting with a Government Official or member of a Government Entity that is in connection with existing business activity with Crawford. In jurisdictions where this is allowed, the Country Manager can provide prior written approval up to a specific amount for

Gifts, Meals and Entertainment Policy

Gifts, Meals, or Entertainment which shall be approved by Global Compliance Office before any such exception shall take place. Beyond any applicable exception amount all expenditures must be approved in advance by the appropriate Global Executive Management (“GEM”) team member.

Prior to giving or receiving Gifts Meals and Entertainment employees are responsible for identifying whether the individual is a Government Official (including family either directly or indirectly related to a government official) or a Government Entity.

Gifts or Meals and Entertainment Exceptions and GME Register

Any exceptions not already addressed by this Policy must be approved in advance, when possible, by the appropriate GEM team member.

All exceptions to the Gifts or Meals and Entertainment Policy must be documented in the Gifts or Meals and Entertainment register that is maintained in accordance with the table below

Operations	Shared Services
Country President	Global Executive Manager

The leader identified above is responsible for the submission of the register to the Global Compliance Office in accordance with the below schedule. In some territories a monthly submission is required to meet the requirements of the UK Bribery Act.

Quarter	Q1	Q2	Q3	Q4
Due Date	30 April	31 July	31 October	31 January

Items that MUST be logged on the Gifts or Meals and Entertainment Gift Register

- All Gifts If the value exceeds US\$250 (or local equivalent) per gift. Where the country is subject to the UK Bribery Act this figure is \$50. It is the responsibility of the Country President to determine if their country is subject to the UK Bribery Act. The UK Bribery Act applies to all Crawford offices that roll up into a United Kingdom entity within the group structure.
- All Meals and Entertainment if the value exceeds US\$250 (or local equivalent) per participant, or \$50 for countries subject to the UK Bribery Act.
- All Meals or subsistence involving Government Official or Government Entity regardless of value.

Gifts, Meals and Entertainment Policy

- All other exceptions to the policy.

Definitions

Word or Phrase	Definition
Foreign Official	Any officer or employee of a foreign (non-USA) government or any department or agency, or any person acting in an official capacity.
Government Official	<p>Includes all elected officials and any officers or employees of a government (e.g., Federal, state, local) or any department or agency, or any person acting in an official capacity.</p> <p>Includes Foreign Officials and U.S. Also includes employees or associates of companies under government ownership or control, such as state-owned enterprises (“SOEs”). More broadly, it also includes political candidates, political party officials, employees of international organizations, and members of royal families.</p>
Government Entity	<p>Refers to any:</p> <ul style="list-style-type: none"> • Government or government division; • Department, agency, or instrumentality of such government or organization; • Political party; or • Company or entity owned or controlled (partially or wholly) by or acting on behalf of the above. Note that in many countries, it is common practice for the Government or Government Officials to own or operate business entities (State Owned Entity or SOE).

Scope

This policy applies to all Crawford employees. Failure to comply with this policy may result in disciplinary action up to and including termination. This policy applies to the full extent allowed by local laws. Crawford business (or regional) units and shared services departments may impose stricter, but not less restrictive, rules than contained in this policy.

Gifts, Meals and Entertainment Policy

Contact

For more information on this policy, contact the Compliance Office or Ethics Office.

Document Information

Document Name	Gifts, Meals and Entertainment Policy
Category	Global Policy
Related Policies	Code of Business Conduct and Ethics Anti-Bribery and Corruption Policy
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