

Regulation Fair Disclosure Policy

Introduction

Crawford & Company (“Crawford” or “the “Company”) is committed to providing timely and credible information regarding the Company and its securities in compliance with all applicable legal and regulatory requirements. In this regard, the Company is fully committed to complying with Regulation Fair Disclosure (also known as “Regulation FD”) enacted by the U.S. Securities and Exchange Commission (the “SEC”). The purpose of this Policy is to ensure that the Company adheres to Regulation FD and other applicable legal and regulatory requirements in its external communications.

Policy

It is the Company's Regulation FD Policy (the “Policy”), reflecting current legal requirements, that neither employees nor directors of the Company or its subsidiaries make any disclosure of material, nonpublic information about the Company to anyone outside the Company (other than to persons who first are obliged to maintain confidentiality with respect to such information such as attorneys, accountants and investment bankers), unless the Company discloses it to the public at the same time in a manner consistent with Regulation FD.

The Company's Chief Financial Officer (“CFO”) and General Counsel, or such other person reporting to the General Counsel as the General Counsel may from time to time designate, shall have the authority to make materiality and distribution determinations covered by this Policy with respect to the information disclosed about the Company.

For purposes of this Policy, “material” information is any information about the Company that would be important to an investor in deciding whether to buy or sell the Company's stock. Examples of areas affected by this Policy include:

- Quarterly earnings releases and related conference calls;
- Speeches, interviews and conferences;
- Providing “guidance” as to the Company's performance or results;
- Responding to market rumors;
- Contact with financial analysts covering the Company;
- Reviewing analyst reports and similar materials;
- Analyst and investor visits;
- Postings on the Company's websites; and
- Social media communications, such as blogs, message boards, Twitter, Facebook, LinkedIn, and YouTube.

Regulation Fair Disclosure Policy

Procedures

Authorized Spokespersons

The General Counsel only has the authority to interpret and enforce this Policy. All questions about this Policy should be directed to the General Counsel. Any suspected or known violations of this Policy should be reported immediately to the General Counsel. **If a Company employee violates this Policy, he or she will be subject to disciplinary action up to and including immediate termination of employment.**

The CFO and the General Counsel must pre-approve any deviation from the policies and procedures outlined in this Policy.

The individuals holding the following offices are authorized to speak on behalf of the Company in all situations and/or field questions from analysts, stockholders and/or the media (the "Authorized Spokespersons"):

- President and Chief Executive Officer
- Chief Operating Officer
- Chief Financial Officer
- General Counsel
- Vice President, Global Marketing and Communications

At various times, anyone of the Company's Authorized Spokespersons may designate others in writing to speak on behalf of the Company and/or respond to specific inquiries when necessary due to the unavailability of an Authorized Spokesperson or due to the specific nature of the request. While others may be designated in writing from time to time to speak on behalf of the Company, it is essential that the Vice President, Global Marketing and Communications, the General Counsel and the CFO have knowledge of the information being disseminated by those individuals to facilitate the Company's compliance with other applicable legal and regulatory requirements in its external communications.

Company personnel who are not explicitly authorized to speak on behalf of the Company are prohibited from communicating potentially material nonpublic information about the Company and should refer all inquiries from analysts, stockholders and/or the financial community to the Company's CFO. All inquiries from the media should be referred to the Vice President, Global Marketing and Communications.

Regulation Fair Disclosure Policy

Public Communications and Press Releases

For all financial public communications initiated by the Company, the CFO will draft all related press releases and circulate the press release to the Authorized Spokespersons and other significant involved parties or Company personnel prior to its release. The General Counsel will approve the press release in its proposed final form.

For all other material public communications initiated by the Company, the Vice President, Global Marketing and Communications will draft all related press releases and circulate the press release to the Authorized Spokespersons and other significant involved parties or Company personnel prior to its release. The General Counsel or his designee will review the press release in its proposed final form.

The General Counsel or his designee will insure that all press releases are disseminated in accordance with applicable rules of the SEC and the New York Stock Exchange.

For all material public communications not initiated by the Company, the Vice President, Global Marketing and Communications will review all requests by customers, suppliers, vendors and others to disseminate comments about the Company. Only the Vice President, Global Marketing and Communications and the General Counsel or their designees can authorize and approve such press releases.

All material contact with members of the media, the extent of the coverage provided by the media on Company releases, and evidence of the timing of the disclosure with respect to each release shall be documented appropriately.

An Authorized Spokesperson familiar with the Company's disclosure record will accompany senior management in any meetings or discussions with analysts and stockholders to monitor for unintentional disclosure of material nonpublic information.

If a director, member of management or employee of the Company learns of information that causes him or her to believe that a disclosure may have been misleading or inaccurate when made or may no longer be true, such person should report that information promptly to the General Counsel.

Forward-Looking Statements

If a press release or any presentation materials are to be made available to analysts or stockholders and contain forward-looking statements, including

Regulation Fair Disclosure Policy

explicit forecasts or expressions of "comfort" with respect to an analyst's estimates, such release or materials will be provided to the General Counsel in advance for review and will include appropriate communication of the underlying assumptions and cautionary statements relating to material uncertainties concerning the information communicated in the release or materials. If a forward-looking statement has been made and there is clear meaning to that statement, an employee shall promptly report to the General Counsel any facts or events which might cause that meaning to change.

Scheduled Quarterly Earnings Conference Calls

The Company makes a practice of holding open, publicly-accessible conference calls to discuss quarterly financial results and certain other extraordinary events that arise in the course of its business. Normally, the Company will issue a press release in advance of the call announcing the date, time and access information for the call.

Generally, analysts, professional investors and Company employees will have teleconference access to the call so they may participate in the Q & A portion of the call. Generally, other interested parties will also be able to listen to the call via the Internet through the Company's website. The Company will attempt to respond to as many questions as possible during the time allotted; however, it reserves the right to not respond to any question where it chooses to do so.

Generally, the Company will try to promptly post an audio transcript of the call on the Company's website. All transcripts and archived materials on the Company's website are considered time-dated and the Company undertakes no obligation to update such information, which shall not later be considered a current representation of the Company's views or forecasts.

The following defines in greater detail the steps required to conduct a scheduled quarterly earnings conference call:

- The time, date and means of access to the call will be announced in advance in a separate press release and will be listed on the Company's website and in the Company's press release so that all interested parties have the option of listening in on the call.
- A related Form 8-K and press release in a form and substance consistent with applicable Securities and Exchange Commission and New York Stock Exchange rules will be prepared by the General Counsel. All reasonable efforts shall be made for the press release to be released by the Company at least 2-3 hours before the call (but not more than 48 hours before the call) in accordance with the above Procedure on Public Communications. Upon issuing the press release and prior to the start of the call, the Form

Regulation Fair Disclosure Policy

8-K containing the press release will be filed by the Company with the SEC.

- The CFO will endeavor to “pre-script” the call to the extent possible with assistance from the General Counsel - a mutual sensitizing between the CFO and General Counsel as to the "materiality" of the information to be discussed should occur, thinking through the likely Q&A so as to avoid non-intentional disclosures of material, nonpublic information.
- The Company will hold the call within 48 hours after the related press release is issued. The media/public will have the option of gaining access to monitor the conference call through the webcast on the Company's website (real time and replay mode). A replay of the web cast will be available on the Company's website for at least three (3) months after the conference call. The Company will make certain that the date of the conference call and the oral forward-looking statement safe harbor legend is recited at the beginning of the call or webcast and included in the recording so that the date of the information discussed in the call or webcast is unmistakable to listeners of the archived material. In addition, the Company will conspicuously include on its archive site the forward-looking statement safe harbor language for written communications as the archived webcast becomes a written communication.
- If (i) the conference call is more than 48 hours after the issuance of the earnings release, (ii) the Form 8-K is not submitted to the SEC prior to the oral presentation, (iii) the financial and statistical information contained in the presentation is not provided on the Company's website, or (iv) the call is not complementary to the earnings release, then, to the extent required by applicable SEC rules, the Company will furnish a second Form 8-K containing the text of any announcement or release disclosing material nonpublic information regarding the Company's results of operations or financial condition for a completed quarterly or annual fiscal period that is included in the oral presentation.
- Any written materials distributed to analysts will be posted on the Company's website.
- "Question and Answer" session following analyst conference call:
 - During the question and answer session, management will make all reasonable efforts to avoid introducing additional material information not covered in the presentation.
 - The General Counsel or his designee will be in attendance at all conference calls to assist in efforts to comply with applicable federal securities laws regarding disclosure.

Regulation Fair Disclosure Policy

- If an Authorized Spokesperson engages in post-call discussions with analysts and inadvertently discloses material nonpublic information in such discussion or has any reasonable belief that such an inadvertent disclosure may have been made, such Authorized Spokesperson will immediately contact the General Counsel to determine whether any material information beyond what was covered in the presentation (including the formal Q&A session) was communicated.
- The General Counsel shall make the determination of whether material nonpublic information was disclosed and follow the procedures below for unintentional disclosures, if appropriate.

Intentional Disclosures

Regulation FD requires that, whenever the Company (or a person acting on its behalf) intentionally discloses material nonpublic information to certain specified persons (including broker-dealers, analysts and security holders), the Company must prior to or simultaneously with such disclosure disseminate the information to the public in a manner consistent with Regulation FD.

Unintentional Disclosures

If anyone has a reasonable belief that an unintentional disclosure of material, nonpublic information may have been made by the Company (or the movement of the Company's stock price suggests to any Authorized Spokesperson that there may have been a disclosure of material, nonpublic information), the CFO and the General Counsel should be notified immediately.

The General Counsel will determine whether disclosure of the information should be made to the public and, if so, whether the Company will disseminate the same information to the public by furnishing the information in a press release and/or filing a Form 8-K with the SEC.

If public disclosure is deemed necessary or appropriate, it will be made as soon as reasonably practicable but in no event after the later of (i) 24 hours or (ii) the commencement of the next day's trading on the New York Stock Exchange after the discovery by the General Counsel or the CFO that there has been an unintentional disclosure of information that is material and that has not been previously disclosed publicly.

Monitor Trading

Unusual trading volume or price swings may indicate the inadvertent disclosure of material information that may need to be remedied by a press release. The trading activity of Company stock will be generally monitored by management

Regulation Fair Disclosure Policy

for unusual trading activity. In addition, management will monitor the financial and news media for stories about the Company.

Commenting on Analyst Reports

It is the Company's Policy that only Authorized Spokespersons may review in advance and/or comment on the accuracy of historical data contained in draft analyst reports. In connection with any review of analyst projections, the Company will not provide comments on forecasts or projections, except that comments may be made by an Authorized Spokesperson to the extent that those comments relate to previously disclosed actual results or are made to correct factual inaccuracies of previously disclosed information. Any statements regarding earnings expectations will be limited to press releases and publicly available earnings calls.

To the extent that an analyst asks a question in which an analyst is seeking an answer to refine the analyst's own projections, those questions should be answered by referring to already released materials.

Whenever the Company has issued any estimate or comment regarding distributable earnings, earnings or other financial measures (which will ordinarily be issued through a press release and the filing or furnishing of a Form 8-K), no employee will comment on those projections during the quarter. In response to any question about such information, Authorized Spokespersons will say that it is the Company's policy not to comment on projections during the quarter. The Company will not comment on its intention to update these materials.

Distributing Analyst Reports

Under no circumstances will the Company distribute analyst reports on the Company externally. The Company may post on the Investor Relations section of its website the names and firms of analysts known to the Company to currently conduct research on the Company.

Speeches, Interviews and Conferences

Any participation in public speeches, interviews or conferences by Company personnel should to the extent practicable be reviewed and approved by the Vice President, Global Marketing and Communications. Once approved, Company personnel should adhere to the approved script and not disclose any material, non-public information about the Company during any question and answer sessions.

Visits by Analysts or Other Financial Professionals

Any and all visits by analysts or other financial professionals to any office or branch of the Company must be coordinated with the office of the CFO. Any communications during visits shall be subject to this Policy. All requests made

Regulation Fair Disclosure Policy

directly to any office or branch management/associates must be directed to the office of the CFO.

Use of Social Networks

This Policy applies to the use of social networks, including corporate blogs, employee blogs, chat boards, Facebook, LinkedIn, Twitter, YouTube and any other non-traditional means of communication, to disclose information about the Company.

Responding to Rumors

Generally, the Company will not comment on rumors or speculation. If the Company decides to comment on a rumor, only Authorized Spokespersons may speak on behalf of the Company. Rumors about the Company that are posted in Internet chat rooms or Message Boards are covered by this Policy. Associates should not respond to rumors about the Company including those found in Internet chat rooms or Message Boards. All rumors should be referred to the Vice President, Global Marketing and Communications for appropriate action.

Scope

This policy applies to all Officers, Directors and employees. Failure to comply with this policy may result in disciplinary action up to and including termination.

Contact

The General Counsel of the Company only has the authority to interpret and enforce this Policy. All questions about this Policy should be directed to the General Counsel.

Document Information

Document Name	Regulation Fair Disclosure Policy
Category	Global Policy
Related Policies	Insider Trading Policy
Effective Date	2.0 – September 29, 2017 3.0 – March 01, 2019