

## Hiring Family Members or Significant Others and Non-Fraternization Policy

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### 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 Family Members or Significant Others work for Crawford & Company ("Crawford" or the "Company"), a conflict of interest may exist. In many instances, a conflict may be avoided or remediated without serious consequences if it is reported.

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### Policy

The Company *prohibits* Family Members or Significant Others from working in a position in which one reports directly or indirectly to the other, or is otherwise in a position to influence salary, performance evaluations, promotions, career developments or similar matters. A Personal Relationship among employees can create or give the appearance of an actual or a potential conflict of interest in the employment setting. The SVP–Chief Ethics and Compliance Officer may approve an exception to this policy based on business need, after evaluating the specific facts and circumstances. To avoid problems, the Company may refuse to hire or place a Family Member or Significant Other in a position where the potential for favoritism or conflict exists.

Personal Relationships between employees, and especially those involving officers or management employees can create actual or perceived favoritism, disruptions in the workplace, morale issues or misunderstanding, in addition to creating potential legal risk to the Company.

All Company employees are expected to conduct themselves in a professional manner at all times. In particular, officers and management employees are expected to set a high standard of professional conduct both at work and in any social setting at events sponsored by the Company or social settings that, while not sponsored by the Company, occur within work units of the Company.

### Crawford Officers

Officers are *prohibited* from hiring or working in positions with Family Members or Significant Others in which one reports directly or indirectly to the officer. If such situation occurs, the officer must immediately report it to the SVP–Chief Ethics and Compliance Officer. Upon such report, the Company reserves the right to take any action as described in this Policy. Some situations may be deemed acceptable, as long as the relationship is disclosed.



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Officers of the Company are *prohibited* from developing or engaging in a romantic and/or sexual relationship with another Company employee who reports directly or indirectly to the officer. In the event that such a relationship develops, the officer must immediately report such relationship to the SVP–Chief Ethics and Compliance Officer. Upon such report, the Company reserves the right to take any action as described in this Policy.

### Crawford Management Employees (Directors, Managers, and Supervisors)

Company management employees are *prohibited* from hiring or working in positions with Family Members or Significant Others who reports directly or indirectly to the management employee. If such situation occurs, the management employee must immediately report it to their direct manager and to the Human Resources department. Upon such report, the Company reserves the right to take any action as described in this Policy. Some situations may be deemed acceptable, as long as the relationship is disclosed.

Company management employees are *prohibited* from developing or engaging in a romantic and/or sexual relationship with an employee under their managerial control (whether the employee is a direct report or reports up to the manager through other management levels). In the event that such a relationship develops, the management employee must immediately report such relationship to their direct manager and to the Human Resources department. Upon such report, the Company reserves the right to take any action as described in this Policy.

### Company Actions

The failure to report a Personal Relationship to the Company as described in this Policy will be considered a violation and the employee(s) who have the obligation to report the relationship may be subject to disciplinary action, up to and including termination from their employment with the Company, to the extent allowed by local law.

If a Family Member or Significant Other works in a position in which one reports directly or indirectly to the other, or is otherwise in a position to influence salary, performance evaluations, promotions, career developments or similar matters, the Company may, in its sole discretion, terminate, demote, or transfer the officer or management employee, to the extent allowed by local law. The SVP–Chief Ethics and Compliance Officer may approve an exception to this

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Policy, as some situations may be deemed acceptable, as long as the relationship is disclosed.

If an officer or management employee develops or engages in a romantic and/or sexual relationship with a subordinate employee, the relationship must be immediately disclosed. If the Company determines that such relationship shall be allowed to continue, the officer or management employee and the subordinate employee may be asked to sign a document acknowledging that their relationship is entirely consensual and free from coercion and harassment, and that no conflicts related to that relationship will carry over to the workplace. If a conflict or disruption occurs in the workplace due to such relationship, the officer or management employee may be subject to termination, demotion or transfer at the Company's sole discretion, to the extent allowed by local law.

The Company retains sole discretion regarding its enforcement of this Policy. Decisions made under this Policy will be made based on operational and business reasons and without regard to gender, race, color, religion, creed, age, national origin, sexual orientation, disability or any other characteristic protected by applicable law. Any employee who believes they are being harassed or otherwise discriminated against due to a Personal Relationship or the application of this Policy should report their concerns.

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### Definitions

Word or Phrase	Definition
Family Members	A Family Member includes, but is not limited to, any person who is related by blood or marriage, including domestic partners.
Personal Relationship	A Personal Relationship refers to a relationship with Family Members or Significant Others.
Significant Others	Significant Others means an individual with whom you are having a romantic, sexual and/or significant relationship.

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## Hiring Family Members or Significant Others and Non-Fraternization Policy

### 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.

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### Contact

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

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### Document Information

<b>Document Name</b>	Hiring Family Members or Significant Others and Non-Fraternization Policy
<b>Category</b>	Global Policy
<b>Related Policies</b>	Code of Business Conduct and Ethics
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