

Anti-Bribery and Corruption Policy

Introduction

Crawford & Company and all of its subsidiaries throughout the world (“Crawford” or “the Company”) acts ethically and complies with all anti-corruption laws, including the United States Foreign Corrupt Practices Act (“FCPA”) and the United Kingdom Bribery Act of 2010 (“UK Bribery Act”). No one—be it employees or anyone else acting on Crawford’s behalf—is permitted to offer or accept a bribe or any other improper payment such as a kickback.

This Policy contains important information and practical guidance to help employees comply with anti-corruption laws, and to prevent, detect, and respond to anti-corruption issues when they arise.

Scope

This Policy applies to Crawford officers, directors, employees, and business partners that act on the Company’s behalf such as vendors, consultants, and contractors (collectively “employees”). Failure to comply with this policy may result in disciplinary action up to and including termination.

Anti-Bribery and Corruption Laws

Bribery is illegal under U.S. and international law and may lead to substantial criminal sanctions as well as debilitating reputational harm to Crawford and any individual involved. Crawford complies with all anti-corruption laws where it does business, including but not limited to the FCPA and the UK Bribery Act.

The FCPA applies to all elements of a US business and makes it unlawful to provide money or other benefits or payments to any Foreign Government Official in order to obtain or retain business. The UK Bribery Act has wide geographical application and makes it unlawful to provide money or other benefits or payments to any party, not just government officials. Under these anti-corruption laws, Crawford is responsible for payments made by the company itself, and may be held responsible for payments made by a third party on Crawford’s behalf if the Company did not take appropriate actions to vet and manage the third party.

Anti-corruption laws also require companies to maintain complete books, records, and accounts that accurately and transparently reflect the transactions and dispositions of the company. Failure to follow these books and records provisions can create liability even if there is no proof of a corrupt payment.

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Prohibition against Bribery & Corruption Generally

Crawford's rule about corruption is simple: ***we do not pay or accept bribes and we do not permit others to do so on our behalf.***

- A **bribe** is an offer, promise, or gift of money or anything of value 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.
- **Anything of Value** includes items such as cash, bonuses, gifts, favors, charitable donations, political contributions, offers of employment, offers of hospitality/entertainment, kickbacks, or any other type of preferential benefit.

Crawford prohibits bribery of Government Officials, private persons, or entity.

Dealings with Government Officials

All Crawford employees, no matter where they are located, must pay close attention to interactions with Government Entities and Officials.

- A **Government Entity** refers to any:
 - 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 a common practice for the Government or Government Officials to own or operate business entities.

Examples of Government Entities include, but are not limited to: governments of countries, states, provinces or cities, the United Nations, the International Monetary Fund, a customs or patent office, or a government-owned insurance company, business, bank, hospital, utility, or university.

- A **Government Official** is any individual acting in an official capacity for or on behalf of a Government Entity, such as elected officials, officers or employees of a government, government department or agency, members of royal families, political candidates, political party officials, and employees of international organizations.. Examples of Government Officials include, but are not limited to: a customs official, an inspector from a state agency, an employee of a state-owned bank, an employee of

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a state-owned insurance company, or a journalist employed by a state-owned media company.

- A **Foreign Government Official** is any non-U.S. Government Official.

If any Government Official solicits or requests a payment, favor, or anything of value, it must be declined and immediately reported to the General Counsel or the Ethics & Compliance Office.

Gifts and Entertainment

Reasonable and appropriate Gifts, Meals, and Entertainment intended to establish goodwill and foster better working relationships are generally an acceptable part of Crawford's business activities. However, in order to protect both Crawford and its employees, any Gifts, Meals, and Entertainment must be appropriate for the occasion, consistent with ethical business practices, accurately recorded in Crawford's books and records, and permitted under Crawford's Gifts, Meals and Entertainment Policy.

However, Crawford strictly prohibits the giving of any Gift, Meal, Entertainment, or other social amenity, either directly or indirectly, to any Government Official or any family member of a Government Official. Any exception to this prohibition must be approved in advance by the appropriate Global Executive Management ("GEM") team member.

Please refer to Crawford's **Gifts, Meals and Entertainment Policy** for additional information about permitted Gifts and Entertainment.

Grease or Facilitation Payments

A **grease or facilitation payment** is generally a payment made to a low-level Government Official for the purpose of securing or expediting the performance of a routine, nondiscretionary government action. In certain parts of the world, it may be common for government employees to accept grease or facilitation payments.

Crawford does not permit grease or facilitation payments. Any exception to this general prohibition must be approved by the General Counsel.

Political Contributions

Crawford does not permit political contributions to be made by or on behalf of the Company without the prior written approval of both the President and CEO and the General Counsel.

Charitable Contributions

A **charitable contribution** is any payment or other support given to a charitable organization or to a formal or informal entity organized to provide a public

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benefit. Charitable contributions help Crawford generate goodwill and give back to the communities in which it operates. Examples include sponsorship of educational or fundraising events and contributions in the form of cash or other in-kind donations.

Charitable contributions can present corruption risks, especially if a Government Entity or Government Official controls or has influence over the organization that receives the contributions. Crawford only works with charities that have been vetted to ensure that they are legitimate, reputable and will not be used as a conduit for an improper payment.

All of Crawford's charitable contributions must be:

- Reasonable in nature and amount;
- Permissible under all applicable laws and regulations;
- Provided in a manner that would not embarrass Crawford if publicly disclosed;
- Given openly with no appearance of an improper purpose;
- Given without expecting anything in return; and
- Accurately recorded in Crawford's books and records.

Third Parties

Crawford may retain third parties to conduct business or perform services on its behalf. Examples of third parties include consultants, lawyers, facilitators, management companies, and accountants. The retention of third parties can pose corruption risks, especially when the third parties are likely to interact with Government Entities or Government Officials on Crawford's behalf. Because the actions of a third party acting as an agent or representative of a company can expose that company to liability under anti-corruption laws, Crawford employees must take great care when retaining and managing third parties.

Crawford employees may not enter into any transaction with any third party to make any payment or take any action that the Company would not be permitted to take under this Policy.

Prior to engaging a third party, Crawford undertakes appropriate, risk-based anti-corruption due diligence. Due diligence may include consideration of factors such as the third party's reputation and qualifications, the manner and reasonableness of compensation, and the relationship, if any, between the owners and employees of the third party and a Government Official.

Crawford employees must closely manage third parties working for the Company. If you are planning on retaining a third party, or if you see any of the

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following red flags of corruption, please contact the General Counsel or the Ethics & Compliance Office for additional guidance:

- a transaction calls for a payment to be made to a third party for services that the third party appears to have no qualifications or capabilities to supply;
- a third party states that a particular local law that appears to be applicable to a transaction may be disregarded;
- a third party offers to help the Company obtain government approval for a particular investment or transaction for a fee that seems excessive for the services to be rendered;
- a third party requests that payment be made in cash, to another person, to a numbered account (non-named/anonymous), or to a country other than the one in which the transaction will occur;
- a prospective third party resists reference checks and other due diligence by the Company or opposes contractual provisions that bar violations of anti-corruption laws;
- a fellow employee or supervisor indicates that a transaction should be characterized in the corporate accounts or records in a manner that would conceal or distort the real terms of the transaction;
- a fellow employee or supervisor omits or misstates information about the anticipated use or level of funding for a particular investment or transaction;
- a fellow employee or supervisor suggests that a transaction need not be authorized in the manner ordinarily applicable to transactions of the same type and value;
- the a third party selected for the transaction is known to have family ties to, financial relationships with, or political allegiances to a government or party official with potential influence over a transaction in which the Company is engaged;
- any other circumstances that seem out of the ordinary, unduly secretive or convoluted, or otherwise suspect.

Joint Venture Transactions, Mergers, Acquisitions & New Market Entry

Crawford sometimes expands its business by launching new products, competing for new business, or entering a new geographic market. Crawford may conduct these activities through joint ventures, mergers, acquisitions, or new market entries. Joint ventures, mergers, acquisitions, and new market entries can present corruption risks.

Before entering into a joint venture, initiating a merger or acquisition, or entering a new market, employees must contact the General Counsel who will provide guidance about how to address anti-corruption aspects of the proposed

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transaction, including conducting any required due diligence or drafting relevant contractual language.

Books, Records & Internal Controls

Crawford requires that its books and records be accurate and that its controls are implemented effectively. Employees who enter into transactions on the Company's behalf must ensure that all transactions (no matter how small) are recorded promptly and accurately, contain sufficient detail, and are supported by accessible documentation. Additionally, the Company's records must be retained as required by law or applicable policy. Any unrecorded transaction with a Government Official, either direct or indirect, is a violation of this Policy.

Violations

Failing to comply with anti-corruption laws can have serious consequences for the Company including steep fines, criminal prosecution, and reputational damage. Individuals involved in the conduct may be subject to criminal prosecution, criminal fines, and imprisonment.

Employees involved in a violation of anti-corruption laws, this Policy, or other related Company policies and procedures will be subject to appropriate discipline, up to and including termination. Violations may result in a loss of incentive compensation, bonuses, or other awards, to the extent permitted by law.

Reporting Requirements

Employees have a responsibility to report suspected violations of this Policy, related Company policies or procedures, or any applicable law, including but not limited to the FCPA and UK Bribery Act, no matter how seemingly insignificant the violation may seem. Employees do not need to prove or be sure that a violation occurred to report it.

Employees should report suspected violations through any of the following channels:

- General Counsel;
- the Ethics & Compliance Office; or
- the Confidential AlertLine[®]:
 - WebReporting: <https://crawford.alertline.com>
 - Toll free in the United States: 800-854-3205
 - Toll free outside of the United States: 866.265.4222*

*A country-specific Direct Access Code must be dialed before this number. Direct Access Codes vary by country and may be changed

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at any time. Direct Access Codes can be found on AT&T’s website at: <http://www.business.att.com/bt/access.jsp>.

The Confidential AlertLine® allows you to raise concerns anonymously. However, you are encouraged to identify yourself when making a report so that additional information can be obtained if needed.

All reports will be treated as confidential to the extent consistent with Crawford’s ability to conduct a full and fair investigation and to comply with its legal obligations.

Failure to report known or suspected wrongdoing of which an employee has knowledge may, by itself, subject that employee to disciplinary action. The Company will take no adverse action against any employee who makes a report in good faith.

Questions

For more information on this Policy, contact the Ethics & Compliance Office. For more information about anti-corruption laws, including the FCPA and the UK Bribery Act, contact the General Counsel.

Document Information

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