

Antitrust and Unfair Competition Policy

Introduction

The purpose of antitrust and unfair competition laws is to preserve a competitive economy in which free enterprise can flourish. Crawford & Company's (the "Company") insistence upon full compliance with such laws is based on both our desire to stay within the bounds of the law, and our conviction that the preservation of a free competitive economy is essential.

Broadly stated, antitrust laws prohibit the restraint of free competition by means of collusion, coercion or abuse of economic power. Antitrust is a complex area of law, and no policy, no matter how comprehensive, can answer every question. All questions about antitrust and unfair competition law should be referred to the Legal Department.

Antitrust and similar unfair competition laws are enforced by various government agencies and by civil action taken by private parties. The government can impose severe penalties for violations of the antitrust laws. In recent years, numerous corporate officers and employees have been convicted as felons and sentenced to imprisonment. In addition, fines of tens or even hundreds of millions of dollars may be imposed on a corporation for a criminal offense, and very substantial fines may be imposed on any individual who participates in an offense.

Policy

It is the Company's Antitrust and Unfair Competition Policy, reflecting current legal requirements that employees and directors of the Company or its subsidiaries must refrain from any activity that either violates, or has the appearance of violating, federal and state antitrust laws or similar unfair competition laws.

Standards of Conduct

The standards of conduct contained in this Policy should be followed by all employees, both inside and outside the United States. Employees should obtain Legal Department review of any activity anywhere in the world that raises questions under this Policy or appears contrary to it. Employees who become aware of questionable conduct should bring such conduct to the attention of the Legal Department.

Antitrust laws are highly complex and technical, and these laws are continually being interpreted by the courts. While this policy contains examples of the most common activities associated with antitrust violations, employees must avoid any situation or topic of conversation that could be construed as an attempt to "limit competition."

Antitrust and Unfair Competition Policy

Be especially aware when attending meetings with competitors, and avoid contact with a competitor that is outside of a controlled environment. Avoid casual, informal meetings and social gatherings. Such situations are troublesome because they can easily give the appearance of impropriety. No matter how innocent a particular act may be, legal difficulties can result if the act leads others to believe that a violation has occurred (the appearance of a violation). Employees may have friends and colleagues who work for competitors. While employees are certainly entitled to those relationships, an understanding and commitment that there will never be any improper discussion of business matters will avoid problems.

Even when interacting in a controlled environment, such as participation in a trade organization, it is necessary to be fully aware of those matters that can and cannot be discussed. For instance, the content of trade organization meetings should be limited to publicly available information and legislative initiatives and regulatory actions that are generally applicable to the industry.

Examples of topics that employees must avoid during any communication or meeting with representatives of competitors include, but are not limited to, the following:

- Raising, lowering or stabilizing rates
- Actual current or future rates, including projections
- Other terms or conditions of products or services offered for sale (e.g. discounts or credit terms)
- Matters that would adversely affect the availability of products or services (e.g. limiting availability of product or service)
- Allocation of markets, territories, or potential clients
- Encouragement of a boycott of a product or service
- Profits, including what constitutes a “fair” profit level
- Amount of claims paid or methods of paying claims
- Marketing practices and associated costs

If a competitor tries to enter into a prohibited discussion, terminate the conversation immediately, remove yourself from the discussion group/meeting and report the conduct as directed below.

Employees who believe they may have witnessed conduct that is, or may be, prohibited by this policy should report the matter immediately to the Global Ethics and Compliance Office or the Law Department.

Antitrust and Unfair Competition 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.

Contact

For more information on this policy, contact the Global Ethics and Compliance Office. All questions about antitrust and unfair competition law should be referred to the Legal Department.

Document Information

Document Name	Antitrust and Unfair Competition Policy
Category	Global Policy
Related Policies	Crawford Code of Business Conduct and Ethics
Version No. – Effective Date	Version No. 1.0 – March 24, 2008 Version No. 2.0 - May, 2017 (Changes to format only – no content changes)