

## Acceptable Internet Use and Social Media Policy

**Purpose** Social media and the internet represent a fundamental opportunity for Crawford & Company and its subsidiaries (the “Company”) to improve and deepen its interactions with customers, vendors, business leaders, media, etc. Conversely, they can also pose risks to Company confidential and proprietary information, reputation and brands, and compliance with various regulations and laws. These guidelines are intended to build on long-standing workplace conduct policies and minimize associated business and legal risks.

**Scope** This policy applies to all full time employees, part-time employees, temporary employees, consultants and contractors (collectively, “Workers”). It covers specific rules that the Company expects its Workers to follow when accessing the Company’s internal Intranet system, the Internet or social media, whether for personal or business purposes or whether the used device belongs to the Company, in consideration of their employment or business relationship with the Company and subject to discipline for violations.

**Definitions** **Internet:** Allows access to the World Wide Web (“Web”), which contains information and enables communication outside of the Company. Access to the Internet is provided primarily to conduct business transactions.

**Intranet:** Allows authorized users to access information restricted for use within the Company.

**Social Media:** Social Media includes all forms of public, Web-based communication and expression that bring people together by making it easy to publish content (including personal and non-professional content) to many audiences.

Examples of social media include the following:

- Social networking sites (e.g., Facebook, LinkedIn)
- Video and photo sharing websites (e.g., YouTube, Vimeo, Instagram)
- Micro-blogging sites and Apps (e.g., Twitter, Instagram, Vine, Snapchat)
- Blogs (e.g., corporate blogs, personal blogs, media-hosted blogs)
- Forums and discussion boards (e.g., Reddit)
- Collaborative publishing (e.g., Wikipedia)
- Bookmark sites (e.g., Pinterest)
- Linklog sites (e.g., blogs that only post URLs for interesting sites)

## Acceptable Internet Use Guidelines

Internet and Intranet systems and computing devices (“Resources”) are provided for conducting Company business and accessing employment related information. You shall not use Resources to attempt unauthorized entry to a network or computer accessible via the Internet, deliberately releasing malicious software onto the network, engaging in recreational games, obtaining or distributing pornographic, sexually oriented materials or conducting any illegal activity.

## Guidelines for Using Social Media on Behalf of the Company

This section applies to Company Workers who are authorized to create or contribute to blogs, wikis, social networks, virtual worlds, or any other kind of social media both on and off Company sites, on behalf of the Company (“Authorized Social Media Representative”). This section does not apply to Workers using social media for personal purposes.

**Approval to Post on Behalf of the Company:** Authorized Social Media Representatives may post on external social media sites for work purposes. Before you can become an Authorized Social Media Representative on a social media platform, you must have approval from your manager and be accredited by [Global Marketing and Corporate Communications departments](#).

Approval is granted only for communications connected to corporate-led initiatives that comply with all applicable corporate policies, laws, and regulatory obligations.

**Training Requirements:** When representing the Company, you are required to complete training on emerging social trends and evolving best practices in social media, known as the Corpedia Social Media Use Training Module.

**Records Retention Requirements:** Communications within the scope of this policy that meet the definition of a “company record” as defined by the Company’s Records Management Policy. Information of the type contained in your posts or communications must be maintained in accordance with the provisions of that policy.

### **Standards for Authorized Social Media Representatives:**

**Remain Transparent.** You must disclose your employment with the Company in all communications with customers, the media, or other Company stakeholders when speaking on the Company’s behalf and provide Company contact information to those parties upon request. Fake identities, or “sock puppets”, are prohibited when contributing, editing, or modifying content related to the Company. Never hide your identity for the purpose of promoting the Company through social media.

**Accurate Information.** Ensure that any content you publish is factually

accurate and complies with relevant Company policies, particularly those relating to confidentiality and disclosure.

**Branding.** If you must include the Company's trademarks, logos and brands in your posts or communications, you must use the most current versions.

**Respect and Comply with Terms of Use of All Sites You Visit.** Review the terms of use of all Internet sites you visit and ensure your use complies with them. If you are using social media as part of your job duties, pay particular attention to terms relating to:

- Prohibitions or restrictions on the use of the social media sites, including prohibitions or restrictions on use for advertising, marketing and promotions or other commercial purposes. Keep in mind that some internet sites have different terms of use for businesses.
- Ownership of intellectual property used on, or information collected or generated through use of, the site (for example, any of the company's copyrighted material and trademarks that might be posted on the site, or user information the company collects through the site).
- Requirements for licenses or other permissions allowing use by the site owner and other third parties of the company's trademarks or other intellectual property.
- Privacy rights and responsibilities of the site owner and users.

**Remain Thoughtful and Professional.** Post only professional and constructive comments within your area of expertise, think before posting, and adhere to the Company's policies. As a representative of the Company, you understand its commitment to respectful, civil, and thoughtful discussion. Some online communities can be volatile, tempting users to behave in ways they otherwise would not. Your reputation and the Company's are best served when you refrain from engaging in intemperate discussions. If you have any questions about whether it is appropriate to write something about certain kinds of material in your role as a Company representative, ask the **Global Marketing and Corporate Communications** departments before you post.

**Protect Confidential Information.** Respect proprietary information and content of the company, protect its confidentiality, and adhere to Company policies.

**Account Ownership.** Remember that the Company owns all information and content used in corporate social media accounts regardless of the Worker that opens the account or uses it, and may retain all such information and content regardless of separation of any Worker from the Company.

**Legal or News Media Inquiries.** If you are contacted for comment about a Company's publication by the news media or internal or external legal counsel, including in any social media outlet, direct the inquiry to the Corporate Communications department and do not respond without written approval.

## STANDARDS FOR PERSONAL USE OF THE INTERNET AND SOCIAL MEDIA

### General

This policy section applies to all personal use of the internet and social media. We recognize that workers might work long hours and occasionally may desire to use the internet or social media for personal activities at the office or by means of the company's computers, networks and other IT resources and communications systems. We authorize such use during nonworking time so long as you obey the law and Company policies at all times, and be mindful that what you publish will be public for a long time.

### Referencing the Company in Social Media

If you publish content to any website outside the Company, in your personal time, and it is related to your work or subjects associated with the Company, use a disclaimer such as, **“The postings on this site are my own and don’t necessarily represent Crawford & Company’s positions, strategies, or opinions.”** This practice ensures that Worker communications are not construed as misrepresenting the Company’s official position on any given subject.

### Respect Others

Refrain from making comments or posts that could be viewed as obscene or that might constitute harassment or bullying. Examples of such behavior might include offensive posts that could contribute to a hostile work environment on the basis of race, gender, disability, religion or other status protected by law or common policy.

### Respect Privacy

During the course of your employment you may become aware of personally identifiable information (“PII”) of Company employees, contractors, clients, claimants or others who share PII with the Company. Be respectful of the privacy of others and do not post PII to unauthorized internet sites. For more guidance on the proper use of PII please refer to the [Company’s Global Data Protection and Privacy Policy](#).

### Proprietary and Confidential Information

Respect all copyright and other intellectual property laws. For the Company’s protection as well as your own, it is critical that you show proper respect for the laws governing copyright, fair use of copyrighted material owned by others, trademarks and other intellectual property, including the Company’s own copyrights, trademarks and brands. Do not post internal reports, procedures or other internal business related information about financial or Company performance for an upcoming quarter or future periods on public internet sites.

### Respect and Comply with Terms of Use of All Sites You Visit

Do not expose yourself or the Company to legal risk by using an internet site, including social media sites, in violation of its terms of use. Review the terms of use of all sites you visit and ensure your use

complies with them.

### Legal and News Media Inquiries

The Company strives to anticipate and manage crisis situations in order to reduce disruption to our Workers and to maintain our reputation as a high quality company. To best serve these objectives, any news media or legal inquiries that may come to you regarding the Company must be referred to the Legal or Corporate Communications departments.

### No Expectation of Privacy

As noted in the Global Information Security Policy, all contents of the Company's IT resources and communications systems are the property of the Company. Therefore, you should have no expectation of privacy whatsoever in your browsing history, any social media posts or any other kind of information or communications transmitted to, received or printed from, or stored or recorded on the Company's electronic information and communications systems.

The Company reserves the right to monitor the use of Company computer equipment, including anything transmitted through the Company's electronic communication systems, via a Company issued devices.

### Compliance with Company Policies

All other Company policies that may apply to social media use remain in full force and effect. You should always adhere to Company policies when in the workplace, acting on behalf of the Company or privately, whenever your actions can have consequences in the workplace. In particular, the following Company policies should be kept in mind when using social media:

- Policy Against Harassment
- Ethics and Compliance Policy
- Global Information Security Policy
- Global Data Protection and Privacy Policy
- Global Information Classification and Handling Policy
- Records and Information Management Policy

### Reviewing or Refusing Comments on Company Sites

The Company will review any comments submitted by users before they are posted to Company social media sites. Company will not post comments that are spam or defamatory, include profanity, or are otherwise inappropriate or violate our policies or Terms of Use. Company will correct any inaccurate or misleading postings in a timely manner. Most changes will be made by adding to posts, and we will mark any additions clearly.

Company reserves the right to remove any information from internal sites without notice or contact with the author(s) and to deny authors the right to continue to publish.

**Discipline and  
Consequences  
of Non- Compliance**

Violation of this Social Media Policy or any applicable Company policy may result in disciplinary action up to and including termination of employment.

**Conduct Not Prohibited by  
this Policy**

This policy is not intended to preclude or dissuade employees from engaging in activities protected by state or federal law, including the National Labor Relations Act, such as discussing wages, benefits or other terms and conditions of employment, forming, joining or supporting labor unions, bargaining collectively through representatives of their choosing, raising complaints about working conditions for their own and their fellow employees' mutual aid or protection or legally required activities.

**Contact Information**

Social media is an evolving form of communication and expression. If you have any questions about this Policy or its scope or purpose, please contact Legal, Corporate Communications, or Global Marketing.

## Tips and Principles for Good Social Media Use



### **Be Transparent**

Don't expect anonymity. If you aren't willing to stand by what you say or are worried you might get in trouble, it is probably better to not post it.



### **Be Judicious**

Not everything should be shared. Avoid posting any confidential company information or sharing information about your colleagues.



### **Be Knowledgeable**

Review information before posting to ensure accuracy. If you are borrowing content from somewhere else, cite and link your sources.



### **Be Conversational**

Write in your own voice and share your personality, but remember to do so in a respectful way.



### **Be Responsible**

When using social media, you alone are responsible for what you post.



### **Be Considerate**

Respect yourself and your peers. Avoid slurs, personal attacks, obscenity, and inflammatory posts that might constitute harassment or bullying.



### **Be Thoughtful**

It is easy for what you post to be taken out of context. Think about reactions to your post before sharing it.



### **Be Professional**

Avoid posting information or pictures that may represent you in an unprofessional manner—particularly if you are friends or regularly communicate with coworkers on social media sites—as this may undermine your credibility or lead to disciplinary action if what you are sharing violates company policies.



### **Be Meaningful**

Keep the minute details of your life to yourself. Think of what you like and don't like when other people share on social media, and apply those same rules to your own posts.



### **Be Lawful**

Follow all applicable laws, including copyright, data protection, libel, and slander.



### **Be Safe**

Cyber criminals have evolved along with the web, so be careful what you share and with whom you share it.

NOTICE: This page is designed to be used in conjunction with the full length [Acceptable Internet Use and Social Media Policy](#).