

Conflicts of Interest Policy

Introduction

A conflict of interest exists when an interest interferes with, or gives the appearance of interfering with, an employee's ability to make an impartial and sound business decision, thereby undermining trust invested in the Company or individual.

There are four main types of conflicts of interest discussed in this policy:

- ✓ Financial
 - ✓ Operational
 - ✓ Hiring Family Members or Significant Others and Non-Fraternization
 - ✓ Gift, Meals and Entertainment
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Policy

Financial Conflicts of Interest

An actual or perceived conflict of interest may arise if an employee, their significant other, family member or close personal contact has a financial interest that could give at least the appearance of inappropriately affecting any decision an employee may make with respect to Crawford business, or may in any way adversely affect the interests of Crawford. This may occur if they directly own any interest in, or are employed by, any corporation, partnership or other business concern doing business with, seeking to do business with, or directly competing with Crawford or a client of Crawford. If such a relationship exists, the employee must disclose this in writing to the Ethics & Compliance Office.

In the event an employee proposes to have Crawford do business with any company in which the employee, their significant other, family member or close personal contact owns a financial interest or is engaged in management, the employee must disclose to Crawford the material facts. No element of the transaction can proceed unless approved by the Ethics & Compliance Office.

Examples of interest in such third-parties, clients, or competitors include:

- Ownership interest exceeding 1%
- Ownership interest exceeding 5% of the employees or family members net worth
- Receiving commissions, fees, royalties, compensation, loans or advances of money, property, trips, or gifts (other than gifts of nominal value)

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- Directly or indirectly engaging in any business venture, dealing, or transaction (other than transactions in which you acted solely on behalf of Crawford)
- Being a director, officer, consultant, agent, employee, representative of, or acting in any capacity on their behalf
- Personal relationship with someone of influence at a third party with whom Crawford does business or is a competitor

Other examples that can potentially raise conflict of interest concerns include certain involvement in governments and engaging in transactions with a “Related Party.” If such relationships exist, the employee must disclose this in writing to the Ethics & Compliance Office.

- Involvement in governments also include individuals holding an elected, appointed, or advisory position in any federal, state, or local government, being an official or candidate for a political party, or any department or agency, or any person acting in an official capacity.
- A “Related Party” is defined as any senior officer or director of the Company, a shareholder owning in excess of five percent of the company (or its controlled affiliates), a person who is an immediate family member of a senior officer or director, or an entity which is owned or controlled by someone listed above.

Operational Conflicts of Interest

An operational conflict of interest occurs where there is a risk of damage to the interest of any client or stakeholder, whether financially or otherwise. This occurs when there is a perceived or real relationship or interest by any Crawford entity or assignee that could undermine the confidence of any party in the integrity of Crawford, its assignees, or work product.

Opposing and differing interests

Where Crawford is involved with two or more parties arising from the same occurrence, those interests may differ and so create a conflict of interest. There are two types:

- An **opposing interest** arises when Crawford is assigned to act for two or more customers, clients, or carriers (henceforth “customers”), who have directly opposing interests in the outcome of the work product. For example, acting on behalf of both sides of a loss where one customer may seek to subrogate against another customer.

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- A **differing interest** arises when Crawford is assigned to act for two or more customers who have largely the same interests in the outcome of the work, but whose interests may diverge based on their individual concerns. For example, we may be acting for two different customers as a result of the same event/ incident i.e. Buildings and Contents insurers following a flood or a claim where different insurers have provided cover at different periods during which a claim has operated. They may have the same interest in the efficient and expedited resolution of a claim but may differ on matters of policy, service, expectations and communication.

Crawford & Company will not disregard the importance of any potential conflict or our responsibility to demonstrably act professionally and ethically. The identification of potential conflicts is the responsibility of the Crawford employee/entity receiving the assignment and all employees/entities thereafter involved in the handling of the assignment or work product. All reasonable inquiries must be made to identify all parties to the assignment and to whom we owe a duty of care.

Any potential conflict, whether perceived or actual, must be identified and addressed promptly. The responsibility to research and identify conflicts does not terminate after the assignment is made, but should continue through to the completion of the assignment or work product.

Detailed information about the procedure for identifying, notifying and remedying Operational Conflicts of Interest can be found within the [Operational Conflict of Interest Procedure](#).

Hiring Family Members or Significant Others and Non-Fraternization

At times, our family or personal relationships could lead to a conflict of interest. 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 of influence (e.g. compensation, terms of employment, evaluations, promotion). A personal relationship among such employees can create, or give the appearance of, an actual or perceived conflict of interest in the employment setting.

Detailed information can be found within the [Hiring Family Members or Significant Others and Non-fraternization Policy](#).

Gift, Meals, and Entertainment

Exchanging business courtesies such as gifts, meals and entertainment helps us build strong business relationships with our customers and third-party business partners. However, exchanging business courtesies is an area where actual or

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perceived conflicts of interest can easily arise. Crawford prohibits the giving or receiving of gifts, and meals and entertainment for the purpose of securing an improper advantage or otherwise inappropriately influencing the recipient. Further, it is prohibited to directly or indirectly offer gifts or entertainment of any value to a government official or a member of a government official’s family.

Refer to the [Gifts, Meals and Entertainment Policy](#) and the [Anti-Bribery and Foreign Corrupt Practices Act Compliance Policy](#) for detailed information.

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 Ethics & Compliance Office.

Document Information

Document Name	Conflicts of Interest Policy
Category	Global Policy
Related Policies	Crawford Code of Business Conduct and Ethics Hiring Family Members or Significant Others and Non-Fraternization Policy Gifts, Meals and Entertainment Policy Anti-Bribery and Foreign Corrupt Practices Act Compliance Policy
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