



**Crawford & Company Global Social Media Policy
November 2010**

Introduction

Social media on the Internet provide a number of benefits in which our employees may wish to participate, from rediscovering old school friends, sharing photographs or videos or researching service providers. When someone clearly identifies their association with Crawford and/or discusses their work using social media, they are expected to behave appropriately when on the Internet, and in ways that are consistent with the company's policies and practices.

All employees should be mindful of the information they disclose on social networking sites. Where they associate themselves with the Company, they should act in a manner which does not bring the Company into disrepute. Employees should also be mindful that items posted on websites are in the public domain and they cannot maintain a reasonable belief of privacy in any information disclosed on social media sites.

This guidance note sets out the principles which Crawford employees are expected to follow when using social media and gives interpretations for current forms of interactivity. Technology advances rapidly and it is impossible to cover all circumstances. However, the principles set out in this document should always be followed.

The intention of this note is not to stop employees from conducting legitimate activities using social media, but instead serves to alert employees to areas in which conflicts can arise.

Philosophy on Social Media

Whether an employee chooses to create or participate in a blog, wiki, online social network or any other form of online publishing or discussion is his/her own decision. However, emerging online collaboration platforms are fundamentally changing the way we communicate, work and engage with each other, clients and partners.

Therefore, it is very much in the Company's interest -- and, we believe, in each employee's own interest -- to be aware of and participate in this sphere of information, interaction and idea exchange.

To learn: We believe in the importance of open exchange and learning -- between Crawford and its clients, and among the many constituents of our emerging business and societal ecosystem. The rapidly growing phenomenon of user-generated web content -- blogging, social web-applications and networking -- are emerging, important arenas for that kind of engagement and learning.

To contribute: As a business, as an industry leader and as a corporate citizen, we believe it is important to make contributions to the dialogue on a broad range of industry issues. To ensure we remain top-of-mind to our clients and potential clients, it is important to share the exciting things we're learning and doing, and to learn from others.

Social Media Basic Principles

Crawford's reputation as an industry leader and for its integrity and customer service is crucial. Our clients, their insureds, claimants, and the overall marketplace must be able to trust the integrity of the Company and its services.

To this end, when identified as a part of the Crawford team, employees and contractors are expected to follow the guidelines set forth below.

1. You are personally responsible for the content published on blogs, wikis or any other form of user-generated media. Be mindful that what you publish will be public for a long time.

2. You should not engage in activities on the Internet which might negatively affect the Company. Be aware of your association with the Company in online social networks. If you identify yourself as a Crawford employee, contractor, etc., ensure your profile and related content is consistent with how you wish to present yourself with colleagues and clients.
3. You must comply with all laws and regulations, including financial disclosure and insider trading requirements.
4. Do not provide or publish Crawford's or another's confidential or proprietary information.
5. Respect your audience. Do not use ethnic slurs, personal insults, obscenity, or engage in any conduct that would not be acceptable in the workplace. You should also show proper consideration for others' privacy and for topics that may be considered objectionable or inflammatory. You should not use social media in any way to disrespect, attack or abuse colleagues, clients, claimants, etc.
 - Be respectful of your colleagues and our competitors, customers, vendors, business partners, and other stakeholders of the company.
 - Do not pick fights.
 - Be the first to correct your own mistakes.
 - Don't alter previous posts without indicating that you have done so.
 - Do not reference, cite, or post images or information unless otherwise all parties have expressly agreed and consented in writing. If you are citing a reference, link back to the original source.
 - Remove information if requested to do so.
6. You must comply with all existing Company policies, including the [Code of Business Conduct and Ethics](#).
7. Unless for a business purpose, you must use a personal email address when using social media sites.
 - Company email addresses should be used **only** for company related communications.
 - Also, company emails are subject to different retention policies.
8. You must not use the Company logos or trademarks without written consent from Corporate Communications.
9. Identify yourself. You should write in the first person and use a disclaimer.
 - Be clear when expressing personal opinions that they do not necessarily represent the Company's official position. Only designated individuals may convey the Company's official position.
 - Use a disclaimer reviewed by the company. The disclaimer should clearly state that the opinion is that of the author and does not represent the view of the Company.
10. You must disclose Company association, when appropriate.
 - When discussing company activities, you should disclose connection to the Company and role within the Company.
 - Postings should not attempt to conceal conflicts of interest.
 - Use good judgment and strive for accuracy in communication.
 - Recognize that errors and omissions and other negligent behavior reflect poorly on the company and may expose the company to liability.
11. Try to add value. Provide worthwhile information and perspective. Crawford's brand is best represented by its people and what you publish may reflect on our brand.

12. You must respect intellectual property rights.
- Where appropriate, reference and cite sources.
 - Do not upload materials without permission.
 - All postings should comply with the Company's applicable confidentiality, privacy, and disclosure policies.

Social Media Guidelines: Detailed Discussion

The Crawford & Company Code of Business Conduct & Ethics ("Code of Conduct") and relevant laws and regulations provide the foundation for Crawford's policies and guidelines for blogs and social computing. The same principles and guidelines that apply to employees' activities in general, as found in the Code of Conduct, apply to employees' activities online. This includes forms of online publishing and discussion, including blogs, wikis, file-sharing, user-generated video and audio, virtual worlds* and social networks.

As outlined in the Code of Conduct, Crawford fully respects the legal rights of our employees in all countries in which we operate. In general, what you do on your own time is your affair. However, activities in or outside of work that affect your job performance, the performance of others, or Crawford's business interests are a proper focus for company policy.

Crawford supports open dialogue and the exchange of ideas

Crawford regards blogs and other forms of online discourse as primarily a form of communication and relationship among individuals. When the company wishes to communicate publicly as a company -- whether to the marketplace or to the general public -- it has well-established means to do so. Only those officially designated by Crawford have the authorization to speak on behalf of the company (see [Regulation Fair Disclosure Policy](#)). However, Crawford believes in dialogue among employees and with our partners, clients, and members of the many communities in which we participate. Such dialogue is inherent in our business model of innovation, and in our commitment to the development of open standards. We believe that employees can both derive and provide important benefits from exchanges of perspective. As a company, Crawford trusts -- and expects -- employees to exercise personal responsibility whenever they participate in social media. This includes not violating the trust of those with whom they are engaging. Employees should not use these media for covert marketing or public relations. If and when members of Crawford's Communications, Marketing, Sales or other functions engaged in advocacy for the company have the authorization to participate in social media, they should identify themselves as such.

What does an employee's personal responsibility mean in online social media activities? Online social media enables individuals to share their insights, express their opinions and share information within the context of a globally distributed conversation. Each tool and medium has proper and improper uses. While we encourage our employees to join a global conversation, it is important for employees who choose to do so to understand what is recommended, expected and required when they discuss company-related topics, whether at work or on their own time.

Know and comply with the Code of Conduct and company policies. Pay particular attention to what the company policies have to say about proprietary information, about avoiding misrepresentation and about competing in the field. If, after checking the policies, you are still unclear as to the propriety of a post, it is best to refrain and seek the advice of management.

Be who you are and speak in the first person. Some bloggers work anonymously, using pseudonyms or false screen names. Crawford discourages that in blogs, wikis or other forms of online participation that relate to Crawford, our business or issues with which the company is engaged. We believe in transparency and honesty. If you are blogging about your work for Crawford, you must use your real name, be clear who you are, and

*Virtual worlds present a number of unique circumstances, not all of which are covered in these guidelines.

identify that you work for Crawford. Nothing gains you more notice in the online social media environment than honesty or dishonesty. If you have a vested interest in something you are discussing, be the first to point it out. But, also be smart about protecting yourself and your privacy. What you publish will be around for a long time, so consider the content carefully and also be judicious in disclosing personal details.

Be thoughtful about how you present yourself in online social networks. The lines between public and private, personal and professional are blurred in online social networks. By virtue of identifying yourself as a Crawford employee within a social network, you are now connected to your colleagues, managers and even our clients. You should ensure that content associated with you is consistent with your work at Crawford. Before you present yourself as connected to Crawford, think about how your profile and posts will be perceived by your colleagues and our clients.

Use a disclaimer. Whether you publish to a blog or some other form of social media, make it clear that what you say there is representative of your views and opinions and not necessarily the views and opinions of Crawford. At a minimum in your own blog, you should include the following standard disclaimer: "The postings on this site are my own and don't necessarily represent Crawford's positions, strategies or opinions."

Managers and executives take note: This standard disclaimer does not by itself exempt Crawford managers and executives from a special responsibility when blogging. By virtue of their position, they must consider whether personal thoughts they publish may be misunderstood as expressing Crawford positions. Further, a manager should assume that his or her team will read what is written. A public blog is not the place to communicate Crawford policies to Crawford employees.

Respect copyright and fair use laws. For Crawford's protection as well as your own, it is critical that you show proper respect for the laws governing copyright and fair use of copyrighted material owned by others, including Crawford's own copyrights and brands. You should never quote more than short excerpts of someone else's work. And it is good general blogging practice to link to others' work. Keep in mind that laws will be different depending on where you live and work.

Protect confidential and proprietary information. Social computing blurs many of the traditional boundaries between internal and external communications. Be thoughtful about what you publish -- particularly on external platforms. You must make sure you do not disclose or use Crawford confidential or proprietary information or that of any other person or company in any online social computing platform. For example, ask permission before posting someone's picture in a social network or publishing in a blog a conversation that was meant to be private.

Crawford's business performance. You must not comment on confidential company financial information such as our future business performance, business plans, or prospects anywhere in world. This includes statements about an upcoming quarter or future periods or information about alliances, and applies to anyone including conversations with Wall Street analysts, press or other third parties (including friends). Our policy is not to comment on rumors in any way unless senior management deems otherwise. You should merely say "no comment" to rumors. Do not deny or affirm them -- or suggest either denial or affirmation in subtle ways.

Protect our clients, business partners and suppliers. Clients, partners or suppliers should not be cited or obviously referenced without their approval. Externally, never identify a client, partner or supplier by name without permission and never discuss confidential details of a client engagement. If a client hasn't given explicit permission for its name to be used, think carefully about the content you're going to publish on any internal social media and get the appropriate permission where necessary. It is acceptable to discuss general details about kinds of projects and to use non-identifying pseudonyms for a client (e.g., Client 123) so long as the information provided does not make it easy for someone to identify the client or violate any non-disclosure or intellectual property agreements that may be in place with the client. Furthermore, your blog or online social network is not the place to conduct confidential business with a client.

Respect your audience and your coworkers. Remember that Crawford is a global organization whose employees and clients reflect a diverse set of customs, values and points of view. Don't be afraid to be yourself, but do so respectfully. This includes not only the obvious (no ethnic slurs, personal insults, obscenity, etc.) but also proper consideration of privacy and of topics that may be considered objectionable or inflammatory -- such as politics and religion. For example, if you host a blog, use your best judgment and be sure to make it clear that the views and opinions expressed are yours alone and do not represent the official views of Crawford. Further, blogs, wikis, virtual worlds, social networks, or other tools should not be used for internal communications among fellow employees. It is fine for employees to disagree, but please don't use your external blog or other online social media to air your differences in an inappropriate manner.

Consideration towards others. Social media sites allow photographs, videos and comments to be shared with thousands of other users. However, it may not be appropriate to share work-related information in this way. For example, there may be an expectation that photographs taken at a Company event will not appear publicly on the Internet, both from those present and perhaps those not at the event. Or the Company itself may have objections. Employees should be considerate to their colleagues in such circumstance and should not post information unless otherwise all parties have agreed and consented. They should also remove information about a colleague if that colleague asks them to do so.

Add value. Crawford's brand is best represented by its people and everything you publish reflects upon it. If it helps you, your coworkers, our clients or our partners to do their jobs and solve problems; if it helps to improve knowledge or skills; if it contributes directly or indirectly to the improvement of our products, processes and policies; if it builds a sense of community; or if it helps to promote our Mission and Values, then it is adding value. Though not directly business-related, background information you choose to share about yourself, such as information about your family or personal interests, may be useful in helping establish a relationship between you and your readers, but it is entirely your choice whether to share this information.

Don't pick fights. Always be respectful, stick to the facts and identify your appropriate affiliation to Crawford. Also, if you speak about a competitor, you must make sure that what you say is factual and that it does not disparage the competitor. Avoid unnecessary or unproductive arguments. Brawls may earn traffic, but nobody wins in the end. Don't try to settle scores or goad competitors or others into inflammatory debates. Make sure that what you are saying is factually correct. Be the first to respond to your own mistakes. If you make an error, be up front about your mistake and correct it quickly. In a blog, if you choose to modify an earlier post, make it clear that you have done so.

Under no circumstance should offensive comments be made about colleagues on the Internet. This may amount to harassment or cyber-bullying and could be deemed a disciplinary offense.

Use your best judgment. Remember that there are always consequences to what you publish. If you are about to publish something that makes you even the slightest bit uncomfortable, review the suggestions above and think about why that is. If you are still unsure, and it is related to Crawford business, feel free to discuss it with your manager. Ultimately, however, you have sole responsibility for what you post to your blog or publish in any form of online social media.

When you find inaccurate information. When you see misrepresentations made about Crawford by media, analysts or by other bloggers, please alert the Vice President – Corporate Communications, so that the company can decide whether and how to handle on an official level. You may certainly use your blog -- or join someone else's to point out the inaccuracy. Always do so with respect, stick to the facts and identify your appropriate affiliation to Crawford.

Don't forget your day job. You should make sure that your online activities do not interfere with your job or commitments to customers.

Planning and Approvals for Social Media Marketing and Communications

Planning for the Use of Social Media

Because of the global impact of social media, plans for marketing and communicating on behalf of Crawford & Company and any of its business units via social media sites must be approved by GEM-level business unit management, Corporate Communications and executive management.

Business units and departments wishing to use social media must:

- 1) Develop a strategic plan, ideally linked to marketing plans, concerning the use of social media: targeted sites and audiences, a summary of blog, video and other content to be posted, when content will be posted, how the business plans to monitor results, and so on.

The strategic plan should identify a point person or persons who will coordinate approvals and who will have authority to post materials and responses on social media sites on behalf of the business unit. It also should identify who is going to develop materials, such as blogs and videos, for posting.

- 2) Submit the social media plan to business unit management for approval.
- 3) After gaining business unit approval, forward the plan to the VP – Corporate Communications for corporate and executive review.
- 4) All significant additions or changes to the plan will need to be submitted for approval as outlined above.

Content Approval

After a business unit has an approved social media plan, content development and approval can begin.

- For approval of materials that can be posted in three business days or more, follow the normal submission and approval process outlined in [Corporate Communications Approval Policy and Procedures](#) posted on the corporate intranet.
- For approval of materials that need to be posted in two business days or less, we will follow an alternate process if those normally involved in approvals are not available. The designated point person should obtain GEM-level business unit approval and forward the materials to the VP – Corporate Communications for review. Corporate Communications will review materials and obtain approval from a member of the Legal Department if the CAO/chief counsel and CEO are not available.

Responding to Postings by Others

The Company has adopted a Social Media Response Decision Tree that provides guidelines for when and how to respond to a posting about Crawford made by others on a social media site. Those with authority to respond to postings should follow those guidelines when doing so. In particular, everyone should exercise extreme discretion about whether a response is absolutely necessary. If choosing to respond, treating the person who made the post with the utmost professionalism and respect is paramount. Remember, you represent a larger entity and your conduct online should reflect that fact.

If those with authority to post on behalf of the Company or a business unit choose to respond to a posting, they should immediately inform the PR Director and provide a link to the post.

If business unit management, Corporate Communications, Legal or the CEO determines that an individual is posting inappropriately in the company's name, his or her rights and responsibilities to post on social media sites will be revoked. Depending on the nature of a response or responses, further disciplinary action will be considered.

Monitoring Social Media Sites

Crawford's corporate PR Director is responsible for monitoring social media sites on behalf of the company. Business units also should set up monitoring programs to track comments applying to their businesses and traffic on social media sites. The PR Director can assist business units with setting up monitoring of social media sites.