

Crawford & Company Global Ethics and Compliance Office Charter

This Crawford & Company (“Crawford”) Global Ethics and Compliance Office (“Ethics Office”) Charter replaces and supersedes the previously established Crawford Compliance and Ethics Council. The mission of the Ethics Office is to develop and implement a global ethics and compliance program through which Crawford employees are provided with the information, tools, guidance, training and support they need to comply with the Crawford Code of Business Conduct and Ethics and to ensure that Crawford’s ethical values are integrated into business practices on a consistent basis around the world. The Ethics Office is comprised of a number of ethics, compliance, training and audit functions as more fully described herein and is managed by Crawford’s Senior Vice President – Chief Ethics & Compliance Officer (“SVP-CECO”).

Organization and Independence

The SVP-CECO reports directly to Crawford’s Chief Administrative Officer and on a “dotted line” basis to the Audit Committee of the Crawford Board of Directors. The SVP-CECO shall have direct access to the Audit Committee. As a matter of policy, the SVP-CECO will review ethics issues with the President & CEO, the Executive Vice President, General Counsel and Chief Administrative Officer and the appropriate business unit or shared services department head before going to the Audit Committee unless in the judgment of the SVP-CECO a conflict of interest precludes an objective, unbiased assessment by those persons.

If a matter involving a potential criminal offense, potential substantial risk of litigation, damage to Crawford’s reputation or involvement of a member of senior management is uncovered during an audit or is reported through one of the reporting mechanisms, the SVP-CECO must brief the Audit Committee and keep the Audit Committee updated until the matter is fully resolved. In the event of a complaint involving the SVP-CECO personally, the matter shall be routed directly to the Chief Administrative Officer and chair of the Audit Committee.

Authority

The Ethics Office conducts ethics and compliance programs and activities under the authority of the Audit Committee and the Crawford Global Executive Management (“GEM”) team. Managers at all levels of Crawford are expected to provide reasonable access to relevant people, information and records during the course of ethics investigations.

Retaliation

Crawford has established procedures for the reporting of complaints regarding accounting, internal control, auditing and other Code of Business Conduct and Ethics or policy matters. These allegations can be reported anonymously. All complaints, whether or not reported anonymously, will be handled in a confidential manner, with disclosure limited to those persons necessary to conduct a full investigation of

the alleged violation or to carry out appropriate disciplinary or corrective action. Reporting suspected violations of the Code of Business Conduct and Ethics or other policies or processes is a benefit to Crawford and is expected behavior of all employees. Any form of retaliation against any employee for reporting in good faith or participating in the investigation of a suspected violation will not be tolerated.

Responsibilities of Executives, Business Unit and Shared Services Leaders

Executives, business unit and shared services leaders are responsible for creating an ethical work environment and acting as role models of ethical behavior. Specifically, they are responsible for:

- cascading communications about business ethics, workplace policies, and corporate values, including their personal message customized to their employee constituency
- ensuring there is a reliable process in place within their respective organizations to confirm that employees receive and complete required training, receive appropriate communications, understand the Code of Business Conduct and Ethics, and comply with its provisions and other workplace policies
- supporting the Ethics Office and its agents on ethics investigation activities in a timely manner
- exemplifying role model behavior when it comes to ethics and other corporate values
- directing all ethics and compliance issues and concerns to the Ethics Office in a complete and timely manner
- ensuring that no retaliation occurs against any employee for reporting or participating in the investigation of suspected violations

Responsibilities of the Ethics Office

The Ethics Office has primary responsibility for developing and implementing a global program that supports an ethical work environment and supports Crawford's compliance with applicable laws and regulations. These responsibilities include:

- developing and implementing a worldwide ethics and compliance program that supports Crawford's Code of Business Conduct and Ethics
- developing and implementing Code of Business Conduct and Ethics training materials for Crawford employees worldwide
- providing and managing channels for employees, agents, suppliers and customers to report suspected violations and provide ethical guidance. These channels shall include the Crawford Confidential AlertLine, which maintains the option to remain anonymous by the individual reporting suspected violations

- providing and managing periodic conflicts of interests surveys and certifications by designated employees
- overseeing investigations of suspected ethical violations. Investigations are conducted using existing internal competencies where practicable. Investigations that involve potential criminal offenses shall be coordinated with the office of General Counsel. Ethics cases may be closed only by the SVP-CECO or Audit Committee
- developing protocols and guidelines for disciplinary measures for any non-compliant, unethical or unlawful activities committed by Crawford employees, officers, directors, agents or other business associates. In order to ensure consistency, participation by the SVP-CECO shall be mandatory in determining disciplinary measures against any Crawford officer or director
- reviewing the Crawford Code of Business Conduct and Ethics periodically and proposing revisions as necessary
- reporting ethics and compliance issues to the Crawford GEM team and the Audit Committee as necessary. The SVP-CECO shall have reasonable access to the GEM team agenda to provide an executive-level forum for discussing emerging trends, issues and concerns
- networking with peer group companies and professional trade associations to understand and adapt best practices

Ethics Office Membership

Subject matter and functional experts comprise the Ethics Office as represented on the attached organizational chart. These experts collaborate closely within the Ethics Office on issues such as:

- implementing ethics training and education
- making recommendations and overseeing changes to ethics and compliance policies
- acting as a resource on ethics and compliance policies and providing guidance on questions and inquiries
- evaluating ethics and business conduct issues and trends in order to address potential problems proactively
- evaluating the performance of the Ethics Office and the effectiveness of the ethics and compliance program