

INSIGHTGLOBAL

COMBINED POLICY, PROCESS & PROCEDURE DOCUMENT

POLICY: Compliance Program Policies and Procedures Guidelines (the Company's "Wrapper Policy")

POLICY NUMBER: COM-01

POLICY OWNER: Compliance Officer

POLICY LAST UPDATED: May 18,2021

POLICY VERSION: 1.2

POLICY STATUS: Final

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REVISION AND APPROVAL HISTORY

Revision History

Version	Date	Author	Revision Notes
1.0	6/18/2020	Outside Counsel	Initial draft of policy
1.1	10/22/2020	Noah Goodwin	Updated to reflect final policies
1.2	5/18/2021	Lexie Conway	Removed Responding to Government Investigations/Search Warrant Policy

Approval History

Approver	Title	Date	Signature
Lexie Conway	CO	5/26/2021	Lexie Conway

Review History

Review Date	Reviewer	Review Comments

Insight Global, LLC
Compliance Program Policies and Procedures Guidelines (the Company's "Wrapper Policy")

I. PURPOSE

The purpose of this policy is to provide an overview of Insight Global, LLC's ("Insight Global" or the "Company") compliance program's policies and procedures (the "Compliance Policies"). Insight Global recognizes the importance of conducting business in an ethical, lawful, and socially responsible manner and strives to maintain the highest legal and ethical standards in conducting its business. In developing, implementing, and applying its Compliance Policies, Insight Global is guided by applicable federal and state law, including the U.S. Department of Health and Human Services Office of Inspector General's seven fundamental elements of an effective compliance program. Compliance Policies empower the Company to foster a culture of compliance while identifying fraud and abuse risk areas. The Company is dedicated to implementing polices through training and education, auditing and monitoring, anonymous reporting, investigations, corrective action and discipline when necessary.

Insight Global expects all Company employees, directors, management, and individuals contracted by the Company to provide staffing support or related services directly to Insight Global customers (collectively, "Personnel") to comply with all Insight Global Compliance Policies. The Compliance Policies is made available to all Personnel and an effective line of communication is continuously established and refined for all Personnel. The Company's Non-Retaliation and Non-Retribution Policy and Compliance Hotline Policy establishes protections for, and extensive lines of communications permitting, anonymous reporting of noncompliance with these Compliance Policies and applicable laws in order to support an effective compliance program.

Insight Global is currently operationalizing a corporate affiliate dedicated exclusively to healthcare related staffing services. While independent policies and procedures governing its operations remain under development, those policies and procedures listed herein *and* expressly referencing this Wrapper Policy shall exclusively govern operations related to Company Personnel involved in healthcare services, providing services in any healthcare setting, or on behalf of, or for the clinical benefit of, healthcare providers or their designees.

II. COMPLIANCE POLICIES OVERVIEW

The Company's Compliance Policies supplement and conform to its Code of Business Conduct and Ethics. The Compliance Officer ("CO") and Compliance Committee ("CC") are tasked with enforcing these policies where applicable, as well as updating them as necessary. Policies generally fall into three categories: (i) Program Structure and Operations; (ii) Employee/ Personnel Conduct; and (iii) Data Privacy and Security. These categories of Compliance Policies are designed to overlap and compliment one another in order to establish a robust set of expectations and practices for all Personnel.

Program Structure and Operations			
Policy Name	Policy Description	Approved/Updated	IG Personnel
Excluded Individuals and Entities Policy	Establishes procedures for determining whether potential and current Personnel are excluded from participation in federal health care programs.	10-28-2020	CO
Compliance Committee Charter	Establishes CC which is responsible for providing oversight and governance of compliance related matters, supporting the CO in the development, implementation, monitoring and maintenance of the Company's compliance program.	10-28-2020	CO
Appointment of the Compliance Officer Policy	Establishes the appointment of a CO who is responsible for the development, implementation, and maintenance of Insight Global Compliance Policies, and monitoring and promoting compliance at Insight Global.	10-28-2020	CO
Investigating and Responding to Compliance Issues Policy	Establishes processes for investigating suspected instances of noncompliance with Company policies or law, and procedures for responding/correcting.	10-28-2020	CO
Monitoring and Auditing Policy	Provides processes for systematic and routine monitoring and auditing of Company operations to ensure compliance with these policies and applicable laws.	10-28-2020	CO
Background Check Policy	Describes safeguards for onboarding Personnel to ensure alignment with the Company's mission and commitment to compliance.	04-01-2020	HR
Business Continuity Plan	Establishes procedures to ensure continuance of normal operations, in the event of an unexpected event that impairs a material business function.	08-01-2017	GC
Equal Opportunity Employment Policy	Describes Company's position prohibiting discrimination in the workplace and employment.	06-01-2016	HR
Customer Contract Management Policy	Provides an overview of the Company's customer contracting processes and requirements for executing new customer contracts, contract amendments, and associated approval thresholds.	05-07-2019	GC
Annual Compliance and Risk Assessment Review	Establishes processes for annual monitoring of Company's compliance program effectiveness and identification of areas for improvement.	10-28-2020	CO
Non-Retaliation and Non-Retribution Policy	Establishes procedures to ensure Personnel can report fraudulent activity or any related compliance concerns without fear of retaliation or intimidation.	10-28-2020	CO
Insight Global Code of Business Conduct and Ethics Policy	Sets forth anonymous avenues for Personnel and third-parties to communicate alleged instances of misconduct to the Compliance Department.	09-01-2016	HR
Compliance Program Policies and Procedures Guidelines	Establishes an overview of all Company Compliance Policies.	10-28-2020	CO
Employee/Personnel Conduct			
Record Retention Policy and Schedule	Establishes requirements for maintenance and destruction of Company and related customer records.	10-28-2020	CO
Fraud, Waste, and Abuse Policy	Describes applicable laws governing fraud, waste, and abuse of government funding and safeguards/instructions for compliance.	10-28-2020	CO
Compliance and Training Policy	Establishes procedures to ensure the Company provides regular education and training program on its Compliance Policies.	10-28-2020	CO
Anti-Harassment and Non-Discrimination Policy	Provides Company's expectations and requirements that business is conducted in a manner fostering community expectations.	03-01-2018	HR
Workplace Violence Policy	Establishes guidance to prevent violence in the workplace.	10-1-2018	HR
Healthcare Conflicts of Interest Policy	Establishes Company requirements for interactions with pharmaceutical, medical device, and similarly-situated manufacturers and business partners.	10-28-2020	CO
Data Privacy and Security			

HIPAA Policy Manual	Establishes procedures to ensure compliance with HIPAA.	09-08-2014	GC
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III. CONFLICTS OF AUTHORITIES

Insight Global’s Compliance Policies supplement (and do not replace) laws, regulations and government rules. As a general matter, laws, regulations, and other government rules control over the standards set forth in the Compliance Policies unless the Compliance Policies impose stricter requirements than these authorities. Questions regarding the application of any laws, regulations, or government rules may be directed to Insight Global’s Compliance and Legal Department as appropriate. Compliance Policies are reviewed at minimum annually to accommodate for updates to federal and state laws.

IV. QUESTIONS RELATING TO INSIGHT GLOBAL’S COMPLIANCE POLICIES.

The Compliance Policies do not address every situation that may arise. The absence of a specific guideline, however, does not relieve Insight Global’s Personnel of the responsibility for operating with the highest ethical standards of business conduct. Any questions concerning the Compliance Policies or any other legal or business ethics matter not specifically addressed in the Compliance Policies should be directed to the Compliance and Legal Department.

V. APPROVAL/MAINTENANCE

This policy is approved by the Compliance Officer and/or the Compliance Committee. Maintenance of this policy will be the responsibility of the Compliance Committee in coordination with the Compliance Officer. The chart above is updated regularly to account for any recent changes or updates to Insight Global Compliance Policies.