



COMBINED POLICY, PROCESS & PROCEDURE DOCUMENT

POLICY: Appointment of Compliance Officer

POLICY NUMBER: COM-03

POLICY OWNER: Compliance Officer

POLICY LAST UPDATED: June 18, 2020

POLICY VERSION: 1.0

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

Approval History

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

Review History

Review Date	Reviewer	Review Comments

I. PURPOSE

The purpose of this policy is to set forth the procedures to be followed by Insight Global, LLC (“Insight Global” or the “Company”) in appointing the Compliance Officer (the “CO”). The CO, with the assistance of the Compliance Committee, is responsible for the development, implementation, and maintenance of Insight Global Compliance policies, and monitoring and promoting compliance at Insight Global with its compliance program (the “Compliance Program”) and applicable federal and state laws.

II. PROCEDURE

- A. **Compliance Officer.** The CO is appointed by the Board of Directors and shall have direct access to company’s president or CEO, Board of Directors, all senior management, and legal counsel. The CO should neither be counsel, nor be subordinate in function or position to counsel or the legal department, in any manner. The specific responsibilities of the CO include the following:
 1. Overseeing, monitoring, and maintaining the implementation and effectiveness of Insight Global’s Compliance Program policies.
 2. In collaboration with Legal and Human Resources, monitoring changes, clarifications and updates to the legal and regulatory requirements and policy guidance applicable to Insight Global’s operations.
 3. Collaborating with Legal and Human Resources to analyze existing and new compliance risk areas and apprising senior management and the Board of Directors of these areas.
 4. Serving as chair of the Compliance Committee, including scheduling meetings and developing meeting agendas.
 5. In collaboration with Legal, developing, maintaining and disseminating written policies and procedures to address existing and new compliance risk areas, including, but not limited to, policies and procedures that relate to business ethics.
 6. Modifying and amending the Compliance Program, as appropriate, to reflect:
 - a. Changes, clarifications or updates in applicable laws, regulations, and policies, including changes, clarifications, and updates to the coverage and reimbursement laws, regulations, and policies applicable to federal health care programs; and
 - b. Changes in the nature or scope of Insight Global’s business, including, but not limited to, new or expanded lines of business, new or expanded geographical presence, and new or expanded contractual obligations.
 7. Modifying and amending the Compliance Program, as appropriate, to respond to identified compliance risk areas.

- 8.** Developing, coordinating, and documenting Insight Global's annual and targeted compliance-related educational and training programs.
- 9.** Ensuring that all employees and contractors are screened to determine suitability and eligibility for their respective roles or positions.
- 10.** Ensuring that all employees receive applicable compliance training, signing the applicable certification(s), and soliciting feedback on compliance training needs.
- 11.** Coordinating routine and ad hoc internal and external compliance reviews and/or audits to assess continued adherence to the compliance policies.
- 12.** Reviewing, in consultation with legal counsel, any new or revised Insight Global business arrangements, particularly those involving federal health care programs, to ensure that these arrangements comply with applicable laws, regulations and policies.
- 13.** Responding to and documenting employee and contractor compliance questions and inquiries.
- 14.** Ensuring that any compliance concerns are documented and acted upon appropriately. This includes, for example:
 - a.** Helping to administer, oversee, and publicize the company mechanisms for reporting suspected compliance violations, including the complaints hotline, and ensuring that information reported via these mechanisms is recorded, logged, investigated and adequately addressed.
 - b.** Ensuring that any employee who in good faith reports a compliance violation or potential compliance violation is treated consistent with the Company's Investigating and Responding to Compliance Issues Policy.
- 15.** Investigating, in consultation with legal counsel and in a timely manner, suspected violations of applicable laws, regulations or policies and taking and documenting corrective action, including disciplinary action, where appropriate.
- 16.** Reporting on a regular basis, at least quarterly, to Insight Global's senior management on compliance issues and the status of Insight Global's Compliance Program (including any obstacles to the effective implementation of the compliance policies).
- 17.** Reporting, at least annually, to the Audit Committee of the Board of Directors and whenever called upon to do so, on compliance issues and the status of Insight Global's Compliance Program (including results of the annual compliance audit and any operational or cultural obstacles to the effective implementation of the Compliance Policies).

- 18.** Consulting with Insight Global's legal counsel about the reporting of self-discovered violations of federal or state health care program requirements.
- 19.** After reasonable inquiry and based on appropriate assurances, performing such certification of compliance as may be required by law or by Insight Global policy.
- 20.** Assessing Compliance Program resources and making recommendations regarding compliance budget to Insight Global's senior management.

B. Access to Personnel and Information

- 1.** CO and his/her designees have the authority to interview all Personnel and review all documents and other information necessary to discharge their responsibilities.

III. APPROVAL/MAINTENANCE

This policy is approved by the Compliance Committee. Maintenance of this policy will be the responsibility of the Compliance Committee.