



COMBINED POLICY, PROCESS & PROCEDURE DOCUMENT

POLICY: Annual Compliance Program Review & Risk Assessment

POLICY NUMBER: COM-04

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 ensure Insight Global, LLC's ("Insight Global" or the "Company") compliance program's policies and procedures (the "Compliance Policies") are implemented consistently and followed by Insight Global employees, directors, managers, and Company staffing contractors directly providing services to customers (collectively, "Personnel"). This policy is designed to ensure Insight Global is continuously identifying risk areas specific to the Company, and in doing so, the Company's Compliance Policies will be updated to reflect those risks.

II. PROCEDURES

A. Annual Internal Compliance Review.

1. The annual review of the Compliance Policies and overall effectiveness will be initiated and planned by the Compliance Officer ("CO") working with the Compliance Committee, the Legal Department and technical consultants, as appropriate.
2. At a minimum, the review should include: (i) interviews with Personnel involved in management, operations, marketing, direct patient care (to the extent applicable), and other related activities; and (ii) review of written materials and documentation related to the Compliance Policies.
3. Following review of all Compliance Policies and overall effectiveness, the CO, with the assistance of the Compliance Committee, will develop goals and improvement plans for the compliance program that respond to the findings and conclusion of the review.
4. Results of the annual review of the compliance program, along with goals and improvement plans will be reported by the CO to the Audit Committee of the Board of Directors (the "Audit Committee").
5. Any deviations or potential problem areas identified will be addressed promptly and effectively with the Audit Committee to ensure resolution. When appropriate, the CO with assistance of the Compliance Committee should work to develop a corrective action plan, which shall be subject to the Company's policies and procedures. Corrective action plans should be designed to ensure not only that a specific issue is addressed, but also that similar problems do not recur. Corrective action plans should include specific items to be addressed and target dates to implement such recommendations.

B. Annual Risk Assessment. The CO or a designee (with the assistance of outside independent review consultants and legal counsel, as necessary) shall conduct an annual risk assessment, which shall identify and prioritize areas of Insight Global's operation that may create risk to the Company or its clients. As part of the annual compliance review outlined above, the risk assessment should include a review of the Company's policies that seek to identify and mitigate risk areas, so that any shortcomings in these policy are addressed and updated accordingly.

The annual risk assessment shall include:

1. Reviews of compliance with Compliance Policies, as well as other Company operations identified by the CO, in consultation with the Compliance Committee, as high risk areas. The areas for review shall be informed by any risk areas identified by the federal government, the states in which Insight Global does business, and related laws and regulations that the CO determines are relevant to Insight Global's business operations.
 2. Audits and monitoring activities conducted by or on behalf of the CO may include a prospective systemic review of Insight Global's processes, protocols, and practices or a retrospective review of actual practices in particular risk areas. Where possible, the annual risk assessment should include: (i) observation of the actual performance of activities subject to the audit; (ii) interviews of Personnel performing the activities; (iii) review of any relevant documentation; and (iv) review of laws and policies applicable to the activities being audited.
- C. **Auditors.** The annual review and the risk assessment shall be conducted under the supervision of the CO with assistance of outside, independent review Consultants and legal counsel, as necessary and appropriate. The entity or individual(s) conducting the annual review shall be independent insofar as they must be able to review the practices and procedures and make objective, independent determinations as to the accuracy or effectiveness of those practices or procedures.

III. DOCUMENTATION

In conformity with generally accepted compliance review procedures, Insight Global shall maintain all final copies of work papers, notes and other documentation generated in connection with audits for a minimum of ten (10) years.

IV. APPROVAL/MAINTENANCE

This policy is approved by the CO and/or the Compliance Committee. Maintenance of this policy will be the responsibility of the Compliance Committee in coordination with the CO.