



COMBINED POLICY, PROCESS & PROCEDURE DOCUMENT

POLICY: Excluded Individuals and Entities

POLICY NUMBER: COM-05

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

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 determining whether potential and current employees and/or contractors are excluded from participation in federal health care programs and from entering into or maintaining certain relationships with individuals or entities that have been excluded from participation in federal health care programs.

DEFINITIONS

The following definitions are to be used as they relate to this policy. Similar or same terms may be defined differently under unique policies:

CO - Compliance Officer or delegate
EPLS - Excluded Parties List System
GSA - General Services Administration
LEIE - List of Excluded Individuals and Entities
OIG - Office of Inspector General
SAM - System for Award Management

Ineligible Person - For purposes of this policy, any individual or entity that:

- is currently excluded, suspended, debarred or otherwise ineligible to participate in federal health care programs (including but not limited to Medicare, Medicaid, and TRICARE);
- has been convicted of a criminal offense related to the provision of health care items or services but has not yet been excluded, debarred or otherwise declared ineligible; or
- Is currently excluded on a state exclusion list.

PROCEDURE

Insight Global will not employ or contract with any person or entity that is currently excluded, sanctioned or debarred by the OIG/GSA or any other duly authorized enforcement agency or license and disciplinary authority.

RESPONSIBILITY

This policy applies to all new hires, Company directors, management, employees, contractors and vendors. It is the responsibility of all colleagues, the CO, Compliance Committee and downstream vendors to comply with this policy. Violation may result in disciplinary action up to and including termination of employment. For contractors and/or consultants, this maybe loss of Insight Global privileges and/or contractual or affiliation rights to conduct business.

PROCESS

Insight Global employees, directors, management, independent contractors and all other third-party agents, **shall not** hire or contract with any ineligible person or any individual or entity currently included on a federal and/or state exclusion list. Additionally, when Insight Global is aware of pending proposed debarment or exclusion, those individuals and

companies must be removed from direct responsibility for or involvement in any federally-funded health care program. If resolution results in conviction, debarment or exclusion of the individual or company, Insight Global will **immediately cease contracting** with that ineligible individual or entity. A contractor selected by Insight Global will verify individual or company exclusions processed against the OIG Sanction Report and the GSA List at the same time.

The following screening procedures will be conducted by the applicable Insight Global representatives:

Screening Prior to Hire (see Background Check Policy):

Prior to hiring an individual or establishing a business relationship with any individuals or entities, Insight Global will conduct a search/screening against:

The current List of Excluded Individuals and Entities (LEIE) of the OIG;
The current GSA EPLS at SAM.gov site for excluded, debarred, or sanctioned individuals and/or entities; *and*
Applicable state debarment resources in the jurisdictions in which such individuals are reasonably anticipated to provide services on behalf of Insight Global or its customers.

In addition, all potential employees will be required to disclose whether they are ineligible or have any reason to be included in any of these lists.

If it is determined upon reasonable due diligence that an individual or entity is listed as excluded by the OIG or GSA/SAM, then you must contact the Compliance and Legal Department before taking any adverse action against the individual or entity, such as terminating the relationship with the excluded party. This must be done within forty-eight (48) hours of receipt of the confirmed matching exclusion or debarment record. If a potential employee or entity is determined to be an excluded Individual or entity, they will no longer be eligible for hire or to conduct business with Insight Global.

After Hire:

After hire, all employees and workforce members are required to complete the Compliance Training and Education program, and sign the certification to attest that the employee has not been excluded, has no knowledge of an impending exclusion, and agreement to notify the Compliance Committee if they should become aware of their potential exclusion.

Monthly Screening:

On a monthly basis, Insight Global shall review the updated list of excluded individuals on the OIG Exclusion List, GSA/SAM list, and applicable state debarment lists and compare it to the current active colleagues and other workforce members' database.

Annual Attestation:

Upon hire/contract and on an annual basis, all Insight Global employees, directors, management, independent contractors and all other third-party agents, are required to complete the Compliance Training and Education program and attest that they will abide by it. All third-party agents must provide an annual attestation to verify that all existing employees have not been excluded from federal programs since the last monthly review.

Compliance Department:

The Compliance Department shall be responsible to conduct the sanction verification for new vendors, contractors, and consultants who have submitted a request for payment for services rendered prior to processing the payment. Upon the initial verification, and monthly thereafter, the Compliance Department will screen all current vendors to verify that all existing vendors and contractors have not been excluded from federal programs since the last review. The Compliance Department shall notify the CO and Legal Department of any matches found during any of the screening processes. If a match is confirmed and the contractor is an Ineligible person on the GSA/SAM List and/or the OIG Sanction Report, the results will be communicated to the CO to address the procedures to be followed.

Compliance Monitoring:

The Compliance Committee shall request reports from the above areas/departments regarding their screening activities and may audit each department's files, as necessary. These procedures will be part of the compliance monitoring activities.

DOCUMENTATION

All documentation related to the exclusion and debarment checks contemplated herein shall be maintained in accordance with the Company's Record Retention Policy.

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. The terms of this policy are subject to the terms of the Company's policy inventory and alignment policy (the "Wrapper Policy"), as may be amended from time to time.