



## **COMBINED POLICY, PROCESS & PROCEDURE DOCUMENT**

### **POLICY: Non-Retaliation and Non-Retribution Policy**

#### **POLICY NUMBER: COM-11**

**POLICY OWNER: Compliance Officer**

**POLICY LAST UPDATED: May 26, 2021**

**POLICY VERSION: 1.1**

**POLICY STATUS: Final**

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## ***REVISION AND APPROVAL HISTORY***

### **Revision History**

<b>Version</b>	<b>Date</b>	<b>Author</b>	<b>Revision Notes</b>
1.0	6/18/2020	Outside Counsel	Initial draft of policy
1.1	5/26/2021	Lexie Conway	Updated the number for the Compliance Hotline

### **Approval History**

<b>Approver</b>	<b>Title</b>	<b>Date</b>	<b>Signature</b>
Lexie Conway	CO	5/26/2021	Lexie Conway

### **Review History**

<b>Review Date</b>	<b>Reviewer</b>	<b>Review Comments</b>

## I. PURPOSE

The purpose of this policy is to provide assurance to Insight Global, LLC ("Insight Global" or the "Company") employees, directors, management, and individuals contracted by the Company to provide staffing support or related services directly to Insight Global customers (collectively, "Personnel") who wish to report concerns through the Company in good faith will not be subject to retaliation, intimidation, retribution or harassment for reporting any concerns.

## II. PROCEDURE

Supervisors, managers, employees, contracted workforce and all other Personnel are not permitted to engage in retaliation, intimidation, retribution or any form of harassment directed against anyone who reports a compliance concern. Anyone who is involved in any act of retaliation, intimidation or retribution against an individual that has reported suspected misconduct and/or participated in an investigation or resolution of any compliance concern in good faith will be subject to disciplinary action.

## III. RESPONSIBILITY

All Insight Global Personnel are required to fully cooperate with the Compliance Officer (the "CO") in the application and administration of this policy. All individuals in a supervisory role are responsible for ensuring that their subordinates cooperate with, are aware of, and understand this policy and the ***Insight Global Code of Business Conduct and Ethics Policy***.

## IV. PROCESS

**A. General.** Anyone who engages in retribution, intimidation, retaliation or harassment against someone reporting a concern is subject to discipline up to and including dismissal on first offense. All instances of retaliation, intimidation, retribution, or harassment against someone reporting a concern in good faith will be brought to the attention of the CC who will, in conjunction with the CO and Legal Department and the Human Resources Department, investigate and determine appropriate discipline, if any. If someone reports a concern regarding his or her own inappropriate or inadequate actions, reporting those concerns does not exempt him or her from the consequences of those actions.

**B. Prompt Reporting.** Prompt and forthright disclosure of an error by an individual, even if the error constitutes inappropriate or inadequate performance, will be considered a positive constructive action by that individual. Reporting misconduct must be in accordance with Insight Global's Investigating and Responding to Compliance Issues Policy and can be directed to any of the following:

1. An employee's direct supervisor or manager at Insight Global;
2. The CO;
3. Any member of the Human Resources Department;
4. Internal legal counsel; or

5. Anonymous reporting mechanisms, including:
  - a. Submitting an anonymous report the Chief Financial Officer, the CO, the Chief Executive Officer, or to a member of the Board of Directors.
  - b. Making an anonymous phone call via the Compliance Hotline to Insight Global's Audit Committee at 1-855-260-7440.

**C. Investigations.** If the Compliance or Legal Department receives a report of intimidation or retaliation, the CO shall conduct an investigation pursuant to the Investigating and Responding to Compliance Issues Policy. The CO shall coordinate with the Human Resources Department on any disciplinary action to be taken against any Insight Global Personnel for incidents of intimidation or retaliation.

**D. Discipline.** After investigation, disciplinary sanctions shall be promptly imposed against the offender(s), without regard to their title or position at Insight Global if, as a result of the investigation, Insight Global determines that there was intimidation of, and/or retaliation against, any Personnel who in good faith reported a compliance concern, or participated in the investigation or resolution of a compliance concern. Such disciplinary sanctions will be imposed following consultation with the Human Resources Department and in accordance with the Company's Investigating and Responding to Compliance Issues Policy.

**V. 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.