
Code of Business Conduct and Ethics

Overview

The positive reputation of Insight Global, LLC (the “Company”) is fundamental to our continued success. Each Insight Global director, officer, employee, and agent has a personal responsibility to make sure our business dealings reinforce and enhance that reputation. Ethical conduct means more than just complying with the laws and regulations that apply to our business. It also means being honest and ethical in everything we do. The Company’s Code of Business Conduct and Ethics (“the Code”) was developed to maintain these high standards of integrity and ethical conduct. While this Code does not address every issue that may arise, it sets basic expectations for conducting Company business. The Codewill help you recognize potential risk areas and serves as the foundation for ensuring legal compliance and ethical business conduct.

You should read this Code carefully in conjunction with all of the Company’s other policies. If you believe that your obligations under this Code are inconsistent with any other policy or applicable law, please consult the Company’s Legal or Human Resources Department for assistance.

Scope

This Code and Company policies referred to in the Code apply to all directors, officers, and employees of the Company. We expect all directors, officers, and employees to read and understand the standards for ethical business conduct contained herein and to comply with these standards.

Resolving Business Ethics Concerns

Because the Code’s standards cannot cover every possible situation, use your personal judgment and common sense to act properly and to recognize when you need guidance. If in doubt, speak with your supervisor, a member of Human Resources, or a member of the Legal Department.

This Code also requires that you report concerns or complaints regarding perceived or potential misconduct, including but not limited to (1) non-compliance with any legal or regulatory requirements or Company policies, including this Code, (2) questionable accounting matters, (3) conflicts of interest, (4) retaliation against employees who report concerns or complaints, and (5) harassment or discrimination. It is in the Company’s best interest that you report such concerns so the Company has the opportunity to investigate the concern or complaint and implement corrective actions, if necessary.

Complaints and concerns may be reported to your supervisor, Human Resources, or the Legal Department. Insight Global recognizes, however, that there may be situations in which you are reluctant to personally come forward to discuss business ethics and conduct issues, especially if doubt exists as to a decision made by a supervisor or other levels of management. Accordingly, Insight Global has established both a telephone hotline and an internet site where directors, officers, employees, and agents of the Company can report suspected ethical or legal violations anonymously. Your anonymous

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comments will be referred by an independent third party operator to the Human Resources and/or Legal Departments.

Anonymous Reporting Options	Contact Information
Make an anonymous report through the Company's reporting hotline (available 24 hours a day, seven days per week)	855-260-7440
Make an anonymous report via a secure website	https://secure.ethicspoint.com/domain/media/en/gui/33288/index.html

The Company has established policies and procedures related to the receipt and handling of reported concerns and complaints. All concerns and complaints will be investigated in a prompt manner, and employees are required to cooperate with the investigations. Although some disclosure may be required to investigate and act upon a report or inquiry, the Company will use all reasonable means available to protect the identity of any person who makes a report or provides information during an investigation, if such protection is requested.

Non-Retaliation Policy

It is the policy of Insight Global to provide an environment where all employees can report ethical concerns or suspected violations of the law, regulations, or Company policies without fear of negative consequences. The Company will not tolerate any act of retaliation or retribution against employees who make such a report in good faith, even if the report is based on a mistake or misunderstanding of the applicable laws and rules. In fact, retaliation for reporting suspected unethical or illegal conduct or for alerting the Company to any questionable situation is against the law.

Acts of retaliation may include, among other things, denial of benefits, termination, demotion, suspension, threats, harassment, or discrimination. Any employee who has reason to believe that he/she is the subject of retaliation or retribution as a consequence of good faith reporting of a concern or complaint should report the situation immediately in accordance with the reporting procedures set forth above. Investigations of possible retribution or retaliation will be taken seriously, investigated promptly, and resolved appropriately. If an employee has committed an act of retaliation or retribution, that employee will be subject to disciplinary action, up to and including termination.

Equal Employment Opportunity

Insight Global strives to offer all employees, current or potential, an equal opportunity to meet work goals and be recognized and rewarded for their good work without regard to race, color, religion, gender, sex (which includes pregnancy, child birth, breastfeeding and related medical conditions), sexual orientation, gender identity or expression, age, ancestry, national origin, mental or physical disability, medical condition, family and medical leave status, genetics, marital status, amnesty, military or covered veteran status or any other attribute or characteristic protected by applicable federal, state, and local laws. The Company makes every effort to maintain a supportive workplace in which diverse backgrounds, cultures and opinions are valued. Our policies, corporate communications, and training and awareness programs

contribute to maintaining this type of work environment. Each employee should endeavor to deal fairly with the Company's clients, vendors, and fellow employees. The Company will act quickly and responsibly to deal with any situation or behavior that prevents a supportive workplace or conflicts with individual dignity, respect, or fairness.

We do not permit illegal discrimination or harassment. Harassment covers a wide range of conduct, including but not limited to unwelcome sexual advances and the use of racial epithets. We will not tolerate unlawful harassment or workplace discrimination of any kind. The Company has provided all employees with our Equal Opportunity Employment, Anti-Harassment and Non-Discrimination and Disability Accommodation policies. If you have any questions regarding these policies or believe that you are being discriminated against or harassed in any way, please inform the Human Resources Department immediately.

Conflicts of Interest

A conflict of interest arises when your personal activities and relationships interfere, or appear to interfere, with your ability to act in the best interest of the Company or its clients. It is important to consider how your actions might be perceived and to avoid the appearance of a conflict of interest. Even when no one has done anything unethical, the appearance of a conflict of interest can result in suspicion of wrongdoing, which may cause a loss of confidence in you and the Company.

In order to avoid a conflict of interest or the appearance of a conflict of interest, you must separate your personal affairs from Company business. You should not personally gain, financially or otherwise, from a Company-related business transaction other than through Company-approved compensation programs. Do not allow the receipt of gifts, meals, or entertainment events through client relationships to influence you. Do not take personal advantage of your association with Insight Global or engage in conduct that is detrimental to the Company's interests or reputation.

Gifts and Entertainment

Whenever gifts are exchanged or entertainment expenditures are made in the context of a business relationship, there is a risk that the gifts and entertainment may influence, or appear to influence, a business decision. A "gift" may include but is not limited to beverages, packaged food, promotional items, recreation (e.g., golf course and tennis court fees), and tickets to cultural and sporting events that are not attended by a representative of the Company. "Entertainment" includes activities such as meals and tickets to cultural and sporting events that are attended by at least one Company representative and a business associate of the Company. If employees do not attend the meals or events with the recipient, the event is not considered entertainment but rather a gift.

If your business decisions or the decisions of those with whom the Company conducts business appear to be influenced by gifts or entertainment, it creates a risk of compromising the Company's reputation and business ethics standards. Cash (including checks, gift certificates, and gift cards that can be redeemed for cash) in any amount must not be accepted or given under any circumstances. Additionally, you must not accept or provide lavish entertainment as part of your interactions with these parties. These standards also apply to immediate family members of employees, directors, and officers.

You may entertain potential or actual customers or others with whom the Company does business if such entertainment is modest in value, provided in the course of a business relationship, consistent with

accepted business practices, and compliant with all applicable laws and generally accepted ethical standards. In assessing the appropriateness of the entertainment expenditure, consider whether public disclosure of the entertainment has the potential to embarrass the Company. Each employee is tasked with inquiring about, and adhering to, the Company's customers' gifts and gratuities policies, if applicable. It is particularly important that employees are aware of and adhere to these limitations when doing business with state, local, or federal government representatives or with clients in specific industries, such as healthcare, where there are special rules that prohibit the gift or receipt of goods or services, even when in relatively small amounts.

Protection and Proper Use of Company Assets

Protecting the Company's assets is a vital responsibility. The Company's assets include tangible property (e.g., laptops, cell phones, supplies, cash, and financial assets) and intangible property (goodwill, information, ideas, trade secrets, customer lists, and pricing). We have an obligation to safeguard Insight Global's assets from loss, misuse, waste, damage and theft. We have similar obligations to safeguard the assets of the Company's customers, both tangible and intangible.

All Company and client assets should be used for legitimate business purposes only. They must not be used for personal benefit or any other improper purpose. Personal use of Company or client equipment must be reasonable. The personal use of email, the Internet, and telephones should be kept to a minimum for both productivity and security reasons. Unless otherwise authorized, all Company and client assets must be returned when leaving the Company's employment.

Client and Other Confidential Information

In our business, many of us will become aware of proprietary and other non- public information about our clients, our employees, and Insight Global. We must maintain the confidentiality of non-public and proprietary information entrusted to us by the Company, its clients, its employees, or other parties with whom we do business, except when disclosure is authorized or legally mandated. The Legal Department can inform you when disclosure is authorized or mandated.

There are four general types of proprietary and confidential information: (i) the Company's operating information, such as trade secrets, business and marketing plans, employee lists and contact information, production technologies, contract terms, and customer lists and databases; (ii) the Company's unpublished financial results, such as earnings or sales data or material corporate events that may impact such results; (iii) confidential information otherwise learned by virtue of association with the Company, such as information about business partners or potential partners, including information about or generated by clients of the Company; and (iv) personal information about the Company's current or former employees or applicants for employment collected and maintained in the Company's files and records. Confidential information includes all non-public information that might be of use to competitors or harmful to the Company, its customers, its employees or applicants for employment, or other parties, if disclosed. Information about the Company's customers and other parties should be assumed to be confidential.

Employees are reminded that, as a condition of employment, they signed an agreement to maintain the confidentiality of the Company's proprietary information and that of its clients and to use such information only in the course of employment. These obligations continue even after employees leave the Company and apply to all communications, including, for example, Internet blogs or "chat rooms," even where the communication is anonymous.

Prohibition against Insider Trading

Insight Global is a private company; however, many of the Company's customers are, or perform services for, companies that have securities that trade on securities exchanges or in private transactions. In the course of performing services for our customers, Insight Global employees may become aware of, or have access to, material, non-public information regarding these public companies. Trading while in possession of material non-public information, or providing such information to others so that they may trade on such information, violates state and federal laws against insider trading.

Insight Global employees are therefore prohibited from: (i) engaging in any transaction involving the securities of an Insight Global client or other company while in possession of material non-public information about such client or company, (ii) providing material non-public information obtained in the course of Insight Global employment to any person who may trade on such information, or (iii) advising or recommending others with respect to the purchase or sale of securities of such a client or company while in possession of material non-public information. In addition to subjecting one to disciplinary action by the Company (up to and including termination), failure to adhere to these rules could expose one to civil or criminal liability.

Compliance with Laws and Regulations

All employees are expected to comply with applicable laws and regulations, as well as Company policies. Both the letter and the spirit of the law should be obeyed. Deliberate disregard of the law will not be tolerated. You are responsible for being informed, acting in good faith, and complying with the law. You also are responsible for seeking advice from the Legal Department when questions arise as to whether a particular act or decision would violate Company policies, the Code, or any laws.

The Company's policy is to cooperate with governmental agencies in the performance of their duties to the fullest extent possible. If you receive notice of any governmental inquiry or a request for information or an interview from a government representative, contact the Legal Department immediately so that the Company can timely and appropriately respond. It is preferred, but not required, that you contact the Legal Department before you speak to a government representative so the Company has an opportunity to protect privileged and confidential business information.

Anti-Bribery Compliance

We must uphold Insight Global's integrity in other nations as diligently as we do in the United States. When conducting business in other countries, we must make certain that all of our activities are in full conformity with local laws and the U.S. laws that govern our interactions with foreign government officials, including the U.S. Foreign Corrupt Practices Act ("FCPA") and local anti-bribery laws. The FCPA prohibits the Company's directors, officers, employees, and agents from offering, authorizing, or promising to pay money or give anything of value, either directly or indirectly through a third party, to foreign government officials or employees of government-owned entities for the purpose of influencing

their acts or decisions in their official capacity or securing any improper advantage for the purpose of assisting the Company in obtaining or retaining business. Particular care should be taken when establishing new business relationships to determine whether a potential business partner has ties to a foreign government, as is sometimes the case when corporations establish joint ventures or similar arrangements with foreign governments as a condition to getting access to a country. In these cases, gifts or entertainment of the customer's or vendor's representatives could run afoul of the FCPA or other anti-bribery laws.

Policy Against Human Trafficking

Insight Global is committed to a work environment that is free from human trafficking and slavery, including forced labor, indentured labor, and unlawful child labor. Insight Global employees, subcontractors, vendors, suppliers and partners must not engage in any practice that constitutes trafficking in persons or slavery, including, but not limited to, the following activities: (1) using forced labor (defined as any work or service not voluntarily performed, that is obtained from an individual under the threat of force or unlawful penalty) for the performance of any work, (2) destroying, confiscating, or otherwise denying access by an individual to the individual's identity or immigration documents, such as passports or driver's licenses, (3) using fraudulent practices during the recruitment of candidates, such as making material misrepresentations during the recruitment of candidates regarding the key terms and conditions of employment, (4) if required by law or contract, (a) failing to provide return transportation or failing to pay for the cost of return transportation upon the end of employment, (b) failing to provide or arrange housing that meets the host country housing and safety standards, or (c) failing to provide an employment contract, recruitment agreement, or other required work document in writing, (5) failing to compensate workers with wages and benefits that meet or exceed the legally required minimums, including compliance with overtime pay requirements, (6) failing to comply with laws regarding maximum hours of daily labor, or (7) failing to comply with laws that establish appropriate working conditions for persons under the age of eighteen.

Antitrust Laws

Fair competition is fundamental to the continuation of our free market system. Insight Global's efforts in the marketplace must be conducted in accordance with all applicable antitrust and trade practice laws and regulations. We are, among other things, prohibited from engaging in any price collusion or concerted effort of any type with a competitor, supplier, or any other party that violates the antitrust or fair trade laws. We also must refrain from inducing others into engaging in illegal competition. We should conduct all relations with competitors as if they were in full public view.

Workplace Safety

Maintaining a safe workplace environment for all Insight Global employees is a core Company value. We are expected to perform our jobs in a safe manner, keep our work areas clean and free of hazards, conform to the requirements of any safety procedures and guidelines prescribed by the Company, and utilize work stations and equipment in the manner in which they are intended to be used. We must report all hazardous conditions, accidents, injuries, and unsafe equipment, regardless of their nature, to a supervisor immediately. For more detailed guidelines on workplace safety, please refer to the Company's Health and Safety Policy, which is available through the Company's Human Resources Department.

Computer and Electronic Communications

Although computer and communication resources can be a great benefit, they can pose significant risks to Insight Global. Email tends to invite the use of informal writing that at first glance may seem harmless, but in another context, such as litigation or in the news media, may prove harmful. Emails deleted in the ordinary course of business may be retrieved. During litigation, the Company can be required to turnover emails when they are requested. We are responsible for writing emails with the same degree of professionalism as in traditional writing and for being careful to avoid comments, language, images or other information that could subject you or Insight Global to embarrassment or legal exposure. Messages that seem private are easy to forward, which means they can come to the attention of the news media, competitors and others who should not be privy to the information. Any e-mail or voice mail sent or Internet site visited using Company resources is a reflection on Insight Global. Misuse of these resources can result in damage to the Company's reputation and even legal action. The use of computer and communication resources must be consistent with all other Company policies, including those addressing harassment, privacy, copyrights, trademarks, trade secrets, and other intellectual property considerations. Make sure that all of your computer and voice mail passwords are kept secure and confidential. Additional details on the Company's electronic communications policy are set forth in the Employee Handbook (for permanent employees) or your Contract Employee Agreement (for temporary employees).

Accurate Books and Records

To comply with this Code, all applicable laws, and generally accepted accounting principles, Insight Global's records must represent all transactions completely and accurately. Company records must not be altered, and all Company records must be recorded and maintained according to Company policies.

To maintain compliance with this Code:

- Employees must create, submit, and maintain accurate records for all accounts;
- Time records must accurately reflect hours worked;
- Clients must be billed accurately for services provided by Insight Global;
- Expenses submitted must be true business expenses and accurately reflect the nature of the expense; and
- All billings and payments must be properly accounted for in accordance with legal, accounting, and regulatory requirements.

Media Relations

Do not comment to the media on issues involving the Company, its competitors, employees, or clients. If the media contacts you, notify your supervisor and seek assistance before responding. (Exceptions to this section include the members of Executive Management.)

Communications and Social Media

Employees should not, while employed by Insight Global as well as following the termination of employment, make any statements or other communications that could reasonably be viewed as malicious, obscene, profane, defamatory, libelous, slanderous, threatening or intimidating, or that might constitute bullying or harassment toward the Company's customers, vendors, co-workers, or others

with whom Employees come into contact through the Company. Examples include offensive posts meant to intentionally harm someone's reputation or that could contribute to a hostile work environment on the basis of race, ethnicity, color, national origin, religion, sex, sexual orientation, age, disability, or any other legally protected characteristic. You also may not personally attack or threaten fellow employees, customers, or vendors. This prohibition extends to statements made in chat rooms and on websites, blogs, and other internet sites or electronic media.

The Company recognizes that some employees may wish to participate in various forms of social media on an individual basis. If you decide to engage in social media communities, you are expected to protect the privacy and confidentiality of Insight Global, its directors, officers, employees, and customers, and you must not speak on behalf of the Company without authorization or otherwise claim or imply that you have such authorization.

Contracts

All contracts entered into by Insight Global must comply with all applicable laws and regulations. Contracts with outside parties and all modifications to the contracts should be in writing and should include a complete description of each party's responsibilities and details on fees and compensation.

Certification and Effect of Code Violations

All employees are expected to read, understand, and comply with the Code. From time to time, you may be asked to certify that you have complied with and will continue to follow the Code's standards and that you are not aware of any potential violations of the Code.

Insight Global intends to make every reasonable effort to prevent the occurrence of conduct that violates the Code and to stop any such conduct that may occur as soon as reasonably possible after its discovery. The Company will enforce the provisions of the Code in a consistent manner. Employees who violate the Code may be subject to discipline, up to and including termination. Nothing in this policy or any other document, or in any verbal or written communications regarding the Code, creates or implies an employment contract or term of employment.