Supplier Code of Conduct
Insight is committed to providing its clients with information technology hardware, software and services procured from a legal and ethical supply chain. The Insight Supplier Code of Conduct describes both legal and social responsibility requirements for our third-party suppliers (“Suppliers”). Suppliers, in all of their activities, will operate in full conformance with the laws, rules and regulations of the countries in which they operate and will conform to these requirements and communicate our Supplier Code of Conduct to their suppliers.

At Insight, honesty and integrity are our guiding principles. We expect our suppliers to share this commitment. Insight requires all of our Suppliers to ensure that working conditions in their operations and supply chains are safe, that all workers are treated with respect and dignity, and that business operations are environmentally responsible and conducted ethically. We will assess conformance to these requirements and will consider a Supplier’s conformance in making sourcing and procurement decisions.

We are fully aware of the responsibility we bear towards our customers, shareholders, employees and the communities in which we work. Thus, we have given ourselves a strict set of ethical standards to guide us in our business dealings.

We expect all of our suppliers, i.e. all companies who do business with any company or division of Insight, to adhere to the same ethical standards. For this purpose, Insight has drawn up this Supplier Code of Conduct, which sets the minimum standards for doing business with any company or division.

**Laws and Ethical Standards**

Suppliers and their employees are required to strictly observe all applicable laws and regulations. Violations of law by even one Supplier can harm Insight’s reputation and ability to carry on business. Suppliers should require that all their employees are familiar with the basic legal requirements that pertain to their duties and responsibilities.

Insight’s commitment is strengthened by its observance of business conduct models such as the Universal Declaration of Human Rights, the Global Compact Principles, the Sustainable Development Goals (SDG) and the Convention on the Rights of the Child, which define the general challenges and commitments in the sections of this Code. Insight also supports industry initiatives, including the Responsible Business Alliance (RBA). The supplier should support the principles of the United Nations Global Compact, the UN Universal Declaration of Human Rights as well as the 1998 International Labor Organization Declaration on Fundamental Principles and Rights at Work, in accordance with national laws and practice. The supplier shall comply with all laws applicable to its business. This especially applies to:

- **Human Rights & Labor**

  At Insight, we treat each other with respect and dignity and we hold our suppliers to the same standard. Suppliers must comply with all applicable laws regarding employment, wage and labor rights.

- **Discrimination**

  We support fundamental human rights for all people and expect our suppliers to do the same.

  Suppliers are expected to have a work environment that is free from any discrimination and harassment. This includes harassment or discrimination on a basis of race, color, religion, sex, gender identity, union membership, maternity, national origin, age, marital status, military service, disability, sexual orientation, genetic information, citizenship, or social or economic status.
A. Labor

Suppliers are committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees or any other type of worker.

1. Freely Chosen Employment – Suppliers must not participate in human trafficking; use forced, bonded, involuntary or slave labor; or purchase materials or services from companies using forced, involuntary or slave labor. Workers must be allowed to maintain control over their identification documents (e.g. passports, work permits or any other personal legal documents). The supplier shall ensure that workers do not pay fees or make any payment connected to obtaining employment throughout the hiring process and the employment period. The supplier shall be responsible for payment of all fees and expenses (e.g. licenses and levies) relating to workers, where legally required. Punishment, mental and/or physical coercion are prohibited. Disciplinary policies and procedures shall be clearly defined and communicated to the workers. Suppliers must be able to certify that materials included in their products comply with the slavery and human trafficking laws of the country or countries in which they do business.

2. Child Labor Avoidance – Suppliers must provide a workplace that is free from all forms of human trafficking, forced labor and child labor in their operations. Suppliers must ensure that workers’ contracts clearly convey the conditions of employment in a language understood by the workers. Supplier must not, in the absence of local law, employ workers under the age of 15. Workers under the age of 18 may not perform work likely to jeopardize their health, safety or education.

3. Harassment and Humane Treatment – Suppliers must treat all workers with respect and dignity. They may not subject workers to corporal punishment, physical, sexual, psychological or verbal harassment or abuse. In addition, Suppliers must provide an environment that allows employees to raise concerns without fear of retaliation. Where it is allowed, Suppliers should have a system that allows employees to anonymously report their concerns. Retaliation against an individual who has made a complaint concerning discrimination, discriminatory harassment, including sexual harassment, or against individuals cooperating with an investigation of a discrimination or harassment complaint, is also unlawful and will not be tolerated.

4. Compensation and Working Hours – The supplier shall comply with all applicable national laws and mandatory industry standards regarding working hours, overtime, days of rest, and wages and benefits. The supplier shall pay workers in a timely manner and clearly convey the basis on which workers are being paid. Deductions from wages as a disciplinary measure shall not be allowed, if not legally permitted. Suppliers are expected to pay their employees a living wage. Suppliers must meet all legal requirements relating to wages, benefits and compensation to employees.

5. Hiring and Employment Practices – Suppliers are expected to support diversity and equal opportunity in their workplaces. Suppliers must prohibit discrimination based race, color, religion, sex, gender identity, union membership, maternity, national origin, age, marital status, military service, disability, sexual orientation, genetic information, citizenship, or social or economic status.

6. Freedom of Association and Collective Bargaining – Suppliers must respect an employee’s lawful rights to associate with others to form and/or join an organization of their choice and bargain collectively, without interference, harassment, or retaliation. This includes the right for employees to communicate openly with management regarding working conditions without fear of retaliation.

7. Diversity – The supplier shall promote an inclusive work environment that values the diversity of its employees. The supplier shall not discriminate or tolerate discrimination with respect to race, color, religion, sex, gender identity, union membership, maternity, national origin, age, marital status, military service, disability, sexual orientation, genetic information, citizenship, or social or economic status or any other characteristic protected under law.
B. Health, Safety & Well-being of Employees

At Insight, employee health, safety, and well-being are fundamental to our success. Suppliers are expected to have implemented effective health and safety management practices within their business. Suppliers must recognize that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production, and worker retention and morale. Suppliers shall abide by all applicable laws and regulations relating to safety and health within their work environments.

1. Well-being of Employees – All employees should be able to perform their duties in a safe and hygienic working environment. Suppliers are expected to provide a working environment that ensures the safety and quality of health of its employees. This includes having safety procedures in place and providing appropriate personal protective equipment to minimize the risk of accident or injury.

2. Safety Training – Suppliers are expected to provide necessary occupational health and safety training and to implement processes to prevent catastrophic events. This includes conveying information to identify potential emergency situations and providing safety and health information related to hazardous materials. It is also necessary to ensure that health and safety programs are consistent for contractors and subcontractors working at suppliers’ facilities.

3. Incident Management – Suppliers are expected to have systems for employees to report health and safety incidents, as well as managing and tracking reports of incidents. Such incidents are required to have corrective action plans to mitigate potential risks. Suppliers must provide necessary medical treatment and facilitate workers’ return to work.

4. Workplace Violence – Any acts of physical intimidation, assaults or threats of violence against another person, including Insight employees, customers, and the public, or the destruction of Insight or personal property, are strictly prohibited. Suppliers may not possess weapons on Insight property. Suppliers may not store a weapon in any Insight vehicle, regardless of its location, or store a weapon in a personal vehicle while on Insight property.

5. Operating Permits and Licenses – Suppliers must comply with all applicable laws and regulations with respect to the health and safety of employees. Suppliers also must have all permits and licenses required to operate.

C. Sustainability & Environmental Responsibility

At Insight, we strive to understand the potential impact of our operations and products on the planet, and we are dedicated to minimizing our corporate footprint through many efforts including our supply chain. Suppliers are expected to recognize that environmental responsibility is integral to producing world class products. In manufacturing operations, adverse effects on the community, environment and natural resources are to be minimized while safeguarding the health and safety of the public. Suppliers must comply with all laws and regulations related to all emissions, water discharge, toxic substance and hazardous waste disposal.

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D. Ethics

We are fully aware of the responsibility we bear towards our customers, shareholders, employees and the communities in which we work. Thus, we have given ourselves and our suppliers a strict set of ethical standards to guide our business dealings. Suppliers and their agents are to uphold the highest standards of ethics.

1. Business Integrity – Suppliers shall abide by all applicable laws and regulations in the countries in which it operates, including but not limited to the Foreign Corrupt Practices Act and all applicable international anti-corruption and anti-competition conventions.

2. Anti-Corruption/Improper Payments – Bribes, kickbacks and similar payments are strictly prohibited. This applies even when local laws may permit such activity. Employees, suppliers and agents acting on behalf of Insight are strictly prohibited from accepting such considerations under any circumstances. Facilitating payments (payments made to expedite or secure performance of a routine governmental action like obtaining a visa or customs clearance) are also prohibited, although personal safety payments where there is an imminent threat to health or safety are allowable.

3. Anti-Trust – Suppliers must not fix prices or rig bids with their competitors. They must not exchange current, recent, or future pricing information with competitors.

4. Counterfeit Parts – We expect our suppliers to develop, implement, and maintain methods and processes appropriate to their products to minimize the risk of introducing counterfeit parts and materials into deliverable products. Effective processes should be in place to detect counterfeit parts and materials, provide notification to recipients of counterfeit product(s) when warranted, and exclude them from the delivered product.

5. Data Protection & Disclosure of Information – Proper management of confidential information is imperative to the success of the business. Suppliers must protect Insight information, electronic data and intellectual property with appropriate safeguards and should utilize such information only within the scope of the business arrangement for which it pertains. Any transfer of confidential information must be executed in a way that secures and protects the intellectual property rights of Insight and its suppliers. Suppliers may receive our confidential information only as authorized by a confidentiality or non-disclosure agreement and must comply with their obligations not to disclose the information, to not use the information except as permitted by the agreement, and to protect the information from misuse or unauthorized disclosure. Our suppliers can expect Insight to similarly safeguard their confidential information. Suppliers may not utilize the Insight trademark, images or other materials to which Insight owns the copyright, unless explicitly authorized.
Suppliers shall adhere to relevant data protection and security laws as well as to respective regulations, in particular with regard to personal data of customers, consumers, employees and shareholders. The supplier shall comply with all said requirements when personal data is collected, processed, transmitted or used.

Suppliers shall safeguard and make only appropriate use of confidential information. The supplier shall not disclose any information that is not known to the general public.

6. Media – Suppliers are solely responsible for what they or their agents or personnel’s post online. We expect Suppliers to forward all media request/inquiries across all channels (print, broadcast, online, radio, social media, etc.) regarding Insight, or work done by Supplier for Insight, for review and approval to PublicRelations@insight.com. Suppliers should not speak about Insight to media or in any public forum without consent from the Insight Public Relations department.

7. Fair Business, Advertising and Competition – Suppliers are expected to conduct business in accordance with all applicable anti-trust or anti-competition laws and regulations. This includes improper exchange of competitive information, price fixing, bid rigging or improper market allocation.

8. Trade Regulation – Suppliers shall comply with all applicable trade and import regulations including sanctions and embargoes that apply to their activities.

9. Anti-boycott Laws – United States laws, and the laws of many other countries, prohibit persons from taking actions or entering into agreements that have the effect of furthering any unsanctioned boycott of a country. Insight Suppliers are required to comply with all anti-boycott laws applicable in their jurisdiction.

10. Embargoes and Sanctions – Insight complies fully with international economic sanctions and embargoes restricting persons, corporations and foreign subsidiaries from doing business with certain countries, groups and individuals. Economic sanctions prohibit or restrict doing business with targeted governments and organizations, as well as individuals and entities that act on their behalf. Sanction prohibitions also may restrict investment in a targeted country, as well as trading in certain goods, technology and services with a targeted country. Insight Suppliers are required to comply with all economic sanctions and embargoes applicable in their jurisdiction.

11. Conflict Minerals – Insight expects its Suppliers to take steps to determine if their products contain conflict minerals (tin, tantalum, gold and tungsten) and if so, implement supply chain due diligence processes to identify sources of these minerals and support efforts to eradicate the use of conflict minerals which directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo or adjoining countries.

12. Political Contributions or Charitable Donations – Suppliers are not authorized to make any type of political contribution or charitable donation on Insight’s behalf.

13. Unauthorized Lobbying – Suppliers are not authorized to undertake any type of lobbying or other similar representative efforts on Insight’s behalf before any kind of government entity, official or body or representative without the express written consent of Insight.

E. Management System

A solid management system and commitment are key to enriching the social and environmental condition of the overall supply chain. Suppliers shall adopt or maintain a management system that is designed to ensure: compliance with applicable laws, regulations and customer requirements; conformance with the principles of this Code; and, identification and mitigation of operational risks.
Insight Supplier Code of Conduct

1. Accurate Records and Accounting – Suppliers are expected to accurately record, maintain, and report business documentation, including but not limited to financial accounts, quality reports, time records, expense reports, resumes and submissions to Insight, their customers and/or regulatory authorities.

2. Supplier Responsibility – Supplier shall have a program in place to manage social and environmental compliance requirements for the business. This program shall include: company commitment policy statements; management accountability and responsibility; legal and customer requirements; risk assessment and management; improvement objectives; training; communication practices; worker participation; audits and assessments; corrective action processes; and, documentation and record requirements.

3. Business Continuity Planning – Suppliers shall be prepared for any disruptions of its business (e.g. natural disasters, terrorism, software viruses, illness, pandemics, infectious diseases). This preparedness especially includes disaster plans to protect both employees as well as the environment as far as possible from the effects of possible disasters that arise within the domain of operations.

Questions or comments

Any Supplier may direct questions or comments about this Supplier Code of Conduct to the Insight Compliance Department at compliance@insight.com.

Violation of the Supplier Code of Conduct

Suppliers must take prompt action to remedy any violation of Insight’s Supplier Code of Conduct, as well as other legal requirements applicable to its activities, and to inform Insight if the violation involves goods or services provided to Insight. A violation of this Code, including a failure to promptly take action to remedy or report a violation will jeopardize the supplier’s business relationship with Insight. If an audit is necessary to confirm a supplier’s compliance with this Code, we require full and timely cooperation.

We ask that you make certain the contents of this Code are shared with those in your organization who have contact with Insight employees and/or work at Insight facilities. We also ask that you share this Code with your employees accountable for your company’s relevant policies and work practices.

Please do not hesitate to contact us should you have any questions or concerns related to the Code. Questions or concerns may also be submitted to Navex Global, an independent firm that provides hotline reporting services to Insight. Contact information for Navex Global can be found below.

Non-compliance reporting

Violations of this Supplier Code of Conduct can be reported confidentially any of the following ways:

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<thead>
<tr>
<th>United States and Canada: 1-877-800-2941</th>
<th>Hong Kong: 800-966-302</th>
<th>Philippines: Access Code 105-11/1010-5511-00 and then 877-800-2941</th>
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<tbody>
<tr>
<td>Australia: 1-800-07-1383</td>
<td>Singapore: 800-110-1927</td>
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<tr>
<td>China: 400-883-3424</td>
<td>India: Access Code 000-117 and then 877-800-2941</td>
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Insight Compliance Department
2701 E. Insight Way, Chandler, AZ 85286

Insight Compliance Helpline
https://insightenterprises.ethicspoint.com