

APPLIES TO: **Insight Enterprises**

POLICY NAME: Anti-Bribery & Anti-Corruption Policy	POLICY NUMBER: NSIT – CP001	EFFECTIVE DATE: 1/15/2018
APPROVED BY: Global Compliance Officer	VERSION NUMBER: 4.0	LAST REVIEW DATE: 8/5/2025
CLASSIFICATION LEVEL: Public		
<i>THE ENTIRE DOCUMENT REFLECTS THE POLICY.</i>		
<i>IT IS THE USER'S RESPONSIBILITY TO CONFIRM THEY ARE USING THE MOST CURRENT VERSION OF THE POLICY, INCLUDING REFERENCES AND LINKS. THE CURRENT VERSION OF THE POLICY IS LOCATED ON THE COMPANY INTRANET.</i>		
<i>ANY TEAMMATE WHO VIOLATES ANY COMPANY POLICY MAY BE SUBJECT TO CORRECTIVE ACTION, UP TO AND INCLUDING TERMINATION OF EMPLOYMENT.</i>		

Applicability

This Anti-Bribery & Anti-Corruption Policy ("Policy") applies to Insight Enterprises and all subsidiaries of Insight globally (hereinafter collectively "Insight"). The Policy applies to all Insight teammates, contractors, and authorized representatives with equal effect.

Purpose

Insight is committed to building and strengthening a culture of ethics and integrity. This Policy establishes business standards of conduct and responsibilities to conform to the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act and similar anti-corruption laws worldwide. It reinforces our ambition and obligation to act honestly and ethically in all of our business dealings anywhere in the world, regardless of nationality or location, as well as to third parties acting on Insight's behalf.

Definitions

- **ABAC** Laws – Anti-Bribery and Anti-Corruption Laws
- **A foreign official** means any officer or employee of a foreign government (i.e., other than the United States) or any department, agency, or instrumentality thereof (which includes a government-owned or government-controlled state enterprise) or of a public international organization, any person acting in an official capacity for or on behalf of a foreign government or government entity or of a public international organization, any foreign political party or party official, or any candidate for foreign political office. Thus, foreign officials include not only elected officials but also employees of companies owned by foreign governments, political party officials and others. It should also be noted that employees of state-owned or state-controlled commercial enterprises generally are government officials under Anti-Corruption Laws and this Policy.
- **Bribery** is offering, giving, receiving or soliciting of anything of value with the intent to influence the actions of an official, or other person, in charge of a public

or legal duty. Bribery is an illegal and unethical gift or lobbying effort bestowed to influence the recipient's conduct.

- **Classification Level (Public)** - This classification applies to information that has been approved by Insight management for release to the public. Making the information public cannot harm the organization in any way.
- **Corruption** characterizes a wide range of dishonest behaviors, ranging from petty payments to facilitate routine transactions to payments to fraudulently secure large public concessions. It may also involve any combination of bribery, kickbacks, extortion, fraud, deception, collusion and money laundering, among other dishonest behaviors.
- **GCO** – Global Compliance Office
- **Kickbacks** are a scheme that arises when suppliers or service providers pay part of their fees to the individuals who give them the contract or some other business advantage. Paying kickbacks to win a bid may be one of the most common forms of bribery. The classic kickback scheme typically involves a competitive public bid and an agent with ties to a government official overseeing the bidding process. The agent, who may also provide otherwise legitimate consulting or advocacy services, offers to represent one of the competitors for the project for a fixed or variable fee. However, the agent has either prearranged to pay the government official a portion of such fees on the side in return for awarding of the contract or has negotiated this during the bidding process. The winning bidder may or may not know of this arrangement.
- **Facilitation payments** are payments that facilitate a normal governmental function, such as to expedite processing paperwork. They are illegal under the UK Bribery Act, regardless of their size or frequency.
- **Foreign Corrupt Practices Act** of 1977 (FCPA) is a United States federal law that prohibits U.S. citizens and entities from bribing foreign government officials to benefit their business interests
- **Third party** is a company or entity with whom you have a written agreement to provide a product or service on behalf of your organization to your customer or upon whom you rely on a product or service to maintain daily operations. It includes, but is not limited to consultants, agents, representatives, subcontractors and subadvisors.
- **UK Bribery Act** 2010 is an Act of the Parliament of the United Kingdom that relates to bribery.

Policy Detail

1. Policy Introduction

- 1.1. Insight has implemented and continuously maintains an Anti-Bribery and Anti-Corruption ("ABAC") compliance program which, in part, educates employees about laws designed to prevent bribery and corruption;
- 1.2. This Policy aims to help Insight comply with applicable ABAC laws. Under these laws it is illegal for Insight, its officers, directors, and teammates to bribe any person or entity and/or receive bribes. Insight is also required to keep accurate

and complete books and records and to maintain proper internal accounting controls.

2. Policy Statement

- 2.1. In general, corruption can be avoided by following Insight's Code of Ethics and Business Practices ("the Code"), and underlying policies. Each teammate must adopt a zero-tolerance policy toward all forms of corruption, including bribery, kickbacks and facilitation payments by carrying out the following actions:
 - 2.1.1. never offering, paying, requesting or receiving bribes or kickbacks, even if requested to do so by a senior manager or anyone else;
 - 2.1.2. never getting involved in any fraudulent or dishonest activity;
 - 2.1.3. never authorizing any corrupt activities or behaviors, nor turning a blind eye to potentially corrupt behavior by subordinates or third parties acting on Insight's behalf;
 - 2.1.4. never engaging in activities that could facilitate corruption, including drafting illegal agreements, drafting fraudulent claims, falsifying evidence, and giving false evidence in legal proceedings; and
 - 2.1.5. never concealing any corrupt or potentially corrupt activity.
- 2.2. Policy Exception: Risk to Life or Liberty
 - 2.2.1. Insight recognizes that corruption-related demands in any form – whether bribes, kickbacks, facilitation payments or otherwise – are often backed by a form of extortion, in some cases including the threat of violence or personal harm;
 - 2.2.2. In such instances, Insight accepts that teammates will need to use their best judgment to abide by Insight's business standards while ensuring that any risk to life or liberty is minimized. Teammates must report any incident where they feel forced to bribe or make a facilitation payment as soon as feasible, and any payments made must be properly recorded.
- 2.3. Facilitation payments
 - 2.3.1. Insight's Global Compliance Program must not permit facilitation payments at Insight, which is subject to the U.K. Bribery Act, in order to be deemed "adequate";
 - 2.3.2. Facilitation payments are illegal in most countries and counter to our values. They are not allowed under the UK Bribery Act and are prohibited by this Policy.
- 2.4. Accounting books and records
 - 2.4.1. Compliance with all accounting and internal controls policies and procedures is mandatory to ensure all accounting records, payments by or on behalf of Insight, expenditures, expense reports, invoices, vouchers, gifts, and any other business expenses are accurately and reliably reported and recorded;

- 2.4.2. False or misleading entries or invoices are prohibited. In addition to being required and governed by applicable accounting standards, maintaining accurate books and records and adequate internal accounting controls is required under many anti-bribery and anti-corruption laws and is an international best practice for preventing improper behavior.

2.5. Due Diligence

- 2.5.1. When Insight pursues the acquisition of any business entity or works with any entity subject to ABAC Laws through a joint venture, the due diligence process associated with the proposed action should include an investigation of the other party's compliance with ABAC Laws;
- 2.5.2. Insight must know who they are doing business with if our risk assessment and mitigation are to be effective. Insight conducts proportionate due diligence across the spectrum with regard to employees, agents, intermediaries, subsidiaries, joint venture and consortium partners, contractors, and other third-party service providers in order to ensure appropriate measures can be taken;
- 2.5.3. Insight has due diligence policies and procedures which cover all new (including, in the context of potential mergers and acquisitions) and existing business and employment relationships;
- 2.5.4. Any issues arising from the due diligence are acted upon in a timely manner.

2.6. Third parties

- 2.6.1. In most instances, Insight cannot avoid liability when a third party representing Insight gives or receives a bribe;
- 2.6.2. We must clearly convey to third parties representing Insight, that we expect them to comply with this ABAC Policy;
- 2.6.3. Due diligence should be performed to ensure that a third party is a bona fide and legitimate entity; is qualified to perform services for which it will be retained; and maintains legal and ethical standards.
- 2.6.4. Agreements with third parties must be in writing and should contain provisions related to the following, as determined by the level of corruption risk present in the third-party relationship:
 - 1. A representation that the third party will remain in compliance with all relevant ABAC laws;
 - 2. A provision that requires the third party to respond to reasonable requests for information from Insight regarding the work performed under the agreement and related expenditures by the third party;
 - 3. Audit provisions allowing Insight to audit transactions under the agreement;
 - 4. All contracts which provide for the disbursement of funds by Insight to a third party should: (i) be in writing; (ii) require the third party to submit a written invoice for payment, and (iii) unless otherwise approved by the General Counsel/Global

Compliance Officer, require that funds be transferred only to a bank account registered in the name of the designated recipient located in the jurisdiction where the relevant business services are to be performed.

3. Consequences of violation

- 3.1. Any Insight teammate who violates this Policy may be subject to disciplinary action, up to and including employment termination, as applicable. Third Parties who violate this Policy are subject to termination of all relationships with Insight. Violations of this Policy may also result in civil and criminal penalties for such individuals in multiple jurisdictions.

4. Policy Review

- 4.1. Policy review should be conducted by policy owner at least once every 2 (two) years or as required.

5. Reporting suspected violations

- 5.1. Any suspected violation of an Insight policy or standard should be reported without delay to the GCO at compliance@insight.com or Insight Compliance Helpline <http://insightenterprises.ethicspoint.com>
- 5.2. Insight has a strict no retaliation policy and will not tolerate any kind of retaliation against anyone who, in good faith, reports a violation of Insight policy or law. If you have questions or problems concerning this Policy, you should contact the GCO (compliance@insight.com).

Related Policies, Procedures and Guidance

- NSIT – IS002

Version History

Version Date	Version Number	Version Changes	Authorized By
1/15/2018	1.0	New	Compliance Office.
04/01/2020	2.0	Content update	Global Compliance Office.
02/03/2021	3.0	Content update	Global Compliance Office.
1/04/2022	4.0	1. Content update 2. Policy Format change.	Global Compliance Office.
11/02/2023	4.0	Review. No changes	Global Compliance Officer
8/5/2025	4.0	Biennial Review	Global Compliance Officer