

APPLIES TO: **Insight Enterprises**

POLICY NAME: Compliance Reporting Policy	POLICY NUMBER: NSIT – CP008	EFFECTIVE DATE: 1/1/2004
APPROVED BY: Global Compliance Officer	VERSION NUMBER: 3.0	LAST REVIEW DATE: 8/11/2025
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 Compliance Reporting 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. Insight teammates have an obligation to report irregularities and violations of the Insight Code of Ethics and Business Practices, policies, and the law.

Definitions:

- **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.
- **GCO** – Global Compliance Office
- **Insight Compliance Helpline**- mechanism for confidential and anonymous (where allowed by local laws) submission of concerns through an independent third party, EthicsPoint, Navex Global (Navex). Navex provides the interface between a Reporter and Insight for telephone and web-portal allegations intake.
- **Retaliation** - An action of harm to any person for having raised issues or reports the concerns in good faith in accordance with the methods described in the Code of Ethics and Business Practices, this Policy and Procedure CP0008PRO.

Policy Detail

1. Policy Introduction

- 1.1. Teammates and others are encouraged to use guidance provided by this policy

for reporting irregularities that impact Insight business.

- 1.2. EMEA teammates should refer to EMEA Whistleblowing Policy NSIT-CP027 for supplemental guidance as it relates to their obligation to report irregularities and violations of the Insight Code of Ethics and Business Practices, policies, and the law as dictated by the EU Whistleblower Directive.

2. Policy Statement

- 2.1. You can report suspected irregularities to your supervisor, department leaders, Human Resources, Global Compliance Office or use Insight Compliance Helpline;
- 2.2. Insight Compliance Helpline is a confidential reporting mechanism that facilitates reporting of irregularities when the normal channels of communication have proven ineffective or are impractical under the circumstances;
- 2.3. Insight Compliance Helpline is operated by an independent third party, can be reached by phone or online, and is available 24 hours a day, 365 days a year;
- 2.4. You may use Insight's Compliance Helpline to report your concerns by visiting the Insight Compliance Helpline [website](#). The use of the Insight Compliance Helpline is entirely voluntary;
- 2.5. Insight regions must be aware and adhere to all local laws and governmental "Reporting" guidance applicable to their respective locations. Each Insight region may have specific policy as to reporting Insight related irregularities. Check Insight's intranet for such guidance;
- 2.6. Reports of "irregularities" may include, but are not limited to the Code of Ethics and Business Practices and policy violations, questionable accounting practices, internal accounting controls and auditing matters, theft, health and safety violations, fraud, harassment, worker intimidation, the payment of bribes and other conduct which is illegal and/or unethical;
- 2.7. Teammates are prohibited from knowingly and willfully making false or fraudulent statements or concealing information;
- 2.8. We take all reasonable steps to maintain the confidentiality of the reporter where it is requested (unless required by law to break that confidentiality);
- 2.9. We investigate complaints:
 - 2.9.1. the Global Compliance office is responsible for receiving Insight-related reports submitted through the Insight Compliance Helpline;
 - 2.9.2. we treat all reports consistently and fairly;
 - 2.9.3. The time frame for handling any reports is 30 to 180 days, depending on content and resources;
- 2.10. We prohibit retaliation:
 - 2.10.1. Our policies make anyone who retaliates against a teammate for engaging in reporting irregularities subject to disciplinary action, up to and including termination of employment or business relationship;
 - 2.10.2. Insight will not tolerate any kind of retaliation against anyone who, in good faith, reports a violation of Insight policy or law. If you feel that you

have been retaliated against for reporting an improper activity you should report this immediately to the Global Compliance Office at compliance@insight.com

3. Policy Review

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

4. Inquiries, Requests or Concerns

- 4.1. Do not use the Insight Compliance Helpline website to report events presenting an immediate threat to life or property. Reports submitted through the Insight Compliance Helpline may not receive an immediate response. If you require emergency assistance, please contact your local authorities;
- 4.2. All inquiries, requests or concerns relating to Compliance Helpline should be sent to the Global Compliance Office at compliance@Insight.com.
- 4.3. 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
- NSIT-CP008PRO – Compliance Reporting Procedure
- EMEA Whistleblowing Policy NSIT-CP027
- EMEA Whistleblowing Procedure NSIT-CP027PRO

Version History

Version Date	Version Number	Version Changes	Authorized By
1/1/2004	1.0	New	Compliance Officer.
6/10/2022	2.0	Content update and format change.	Global Compliance Office.
11/02/2023	2.0	No changes	Lisanne Steinheiser, Global Compliance Officer and Assistant Secretary.
12/06/2023	3.0	Added Sec 1.2 in "Policy Introduction"	Lisanne Steinheiser, Global Compliance Officer and Assistant Secretary.
8/11/2025	3.0	Biennial Review	Lisanne Steinheiser, Global Compliance Officer and Assistant Secretary.