

EQUAL EMPLOYMENT OPPORTUNITY, HARASSMENT, AND BULLYING

A. Prohibition on Discrimination

The Company will make all employment decisions (including decisions about hiring, promotion, transfer, demotion, evaluation, compensation, and termination) without regard to race, color, national origin, sex, sexual orientation, gender identity, gender expression, pregnancy, religion, age (age 40 and over), disability, service in the uniformed services, protected veteran status, genetic information, or any other classification protected by federal, state, or local law.

B. Affirmative Action

The Company will take affirmative action to employ and advance in employment qualified women, minorities, disabled individuals, disabled veterans, recently separated veterans, other protected veterans, and Armed Forces service medal veterans.

C. Accommodations for Disabilities & Pregnancy

Commitment to Equal Employment Opportunities

The Company is committed to principles of equal opportunity for all job applicants and employees. In keeping with this policy, it does not engage in impermissible discrimination based on any protected characteristic, including an individual's disability or pregnancy. The Company will also make reasonable accommodations that are necessary to comply with state and federal disability and/or pregnancy discrimination laws. Consistent with this commitment, the Company will provide a reasonable accommodation to disabled and/or pregnant applicants and employees if the reasonable accommodation would allow the individual to perform the essential functions of the job, unless doing so would create an undue hardship.

This policy specifically includes accommodations for pregnant workers (employees and job applicants with known limitations related to pregnancy, childbirth, or related medical conditions).

Requesting a Reasonable Accommodation

As part of its commitment to make reasonable accommodations, the Company also wishes to participate in a timely, good faith, interactive process with the disabled and/or pregnant applicant or employee to determine effective reasonable accommodations, if any, that can be made in response to a request for accommodations.

If you believe you need an accommodation because of your disability or pregnancy, you are responsible for requesting a reasonable accommodation from the HR Department. You may make the request orally or in writing. However, the Company encourages employees to make their requests in writing and to include relevant information, such as:

- A description of the accommodation they are requesting;
- The reason they need an accommodation; and
- How the accommodation will help them perform the essential functions of their jobs.

After receiving your oral or written request, the Company will engage in an interactive dialogue with you to determine the precise limitations of your disability or pregnancy and explore potential reasonable accommodations that could overcome those limitations. The Company encourages you to suggest specific reasonable accommodations that you believe would allow you to perform your job. With that in mind, the Company is not required to make the specific accommodation requested by you and may provide an alternative, effective accommodation, to the extent any reasonable accommodation can be made without imposing an undue hardship on the Company.

Medical Information

The Company may ask you to provide supporting documents showing that you are pregnant or have a disability within the meaning of the ADA and applicable state or local laws, and that your pregnancy or disability necessitates a reasonable accommodation. If the information provided in response to this request is insufficient, the Company may require that you see a health care professional of the Company's choosing, at the Company's expense. In those cases, if you fail to provide the requested information or see the designated health care professional, your request for a reasonable accommodation may be denied.

The Company will keep confidential any medical information that it obtains in connection with your request for a reasonable accommodation.

Reasonable Accommodation Determinations

The Company makes determinations about reasonable accommodations on a case-bycase basis considering various factors and based on an individualized assessment in each situation. The Company strives to make determinations on reasonable accommodation requests expeditiously and will inform the individual once a determination has been made. If you have any questions about a reasonable accommodation request you made, please contact the HR Department.

No Retaliation

Individuals will not be retaliated against for requesting an accommodation in good faith. The Company expressly prohibits any form of discipline, reprisal, intimidation or retaliation against any individual for requesting an accommodation in good faith.

The Company is committed to enforcing this policy and prohibiting retaliation against employees and applicants who request an accommodation in good faith. However, the effectiveness of our efforts depends largely on individuals telling us about inappropriate workplace conduct. If employees or applicants feel that they or someone else may have been subjected to conduct that violates this policy, they must report it immediately to the HR Department. If employees do not report retaliatory conduct, the Company may not become aware of a possible violation of this policy and may not be able to take appropriate corrective action.

D. Religious Accommodations

Commitment to Equal Employment Opportunities

The Company complies with Title VII of the Civil Rights Act of 1964, and all applicable state and local laws relating to equal employment opportunities and is committed to providing equal employment opportunities to all individuals, regardless of their religious beliefs and practices or lack thereof. Consistent with this commitment, the Company will provide a reasonable accommodation of an applicant's or employee's sincerely held religious belief if the accommodation would resolve a conflict between the individual's religious beliefs or practices and a work requirement, unless doing so would create an undue hardship for the Company.

Requesting a Religious Accommodation

If you believe you need an accommodation because of your religious beliefs or practices or lack thereof, you should request an accommodation from the Human Resources Department. The Company makes determinations about religious accommodations on a case-by-case basis considering various factors and based on an individualized assessment in each situation.

E. <u>Pay Transparency</u>

The Company will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a)

necessary for the performance of their job duties, (b) in response to a formal complaint or charge, (c) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the Company, or (d) consistent with the Company's legal duty to furnish information.

F. <u>Prohibition on Harassment</u>

The Company does not and will not permit harassment of its employees (including both internal employees and Consultants) based on race, color, national origin, sex, sexual orientation, gender identity, gender expression, pregnancy, religion, age, disability, service in the uniformed services, genetic information, or any other class protected by federal, state, or local law. The Company will not tolerate harassment in any form, whether it is committed by managers, employees, or non-employees. All managers and supervisors will be responsible for preventing and eliminating harassment.

Harassment is verbal or physical conduct that denigrates or shows hostility toward an individual or conduct that creates an intimidating, hostile, or offensive working environment for an individual because of their sex, sexual orientation, gender identity, gender expression, race, color, religion, national origin, age, genetic information, or disability. Harassment may include, but is not necessarily limited to, epithets, slurs, jokes, or other verbal or physical conduct relating to an individual's race, color, national origin, sex, sexual orientation, gender identity, gender expression, pregnancy, religion, age, disability, service in the uniformed services, genetic information, or any other class protected by federal, state, or local law.

Sexual harassment includes any unwelcome sexual conduct (including sexual advances, requests for sexual favors and other verbal and physical conduct of a sexual nature) that is either made as a condition of employment or that creates an offensive, intimidating, or hostile work environment.

Sexual harassment can take many forms and may involve individuals of the same or different gender. Sexual harassment may include (but is not limited to):

- (1) Unwanted or unwelcome physical contact or conduct of any kind, including, patting, pinching, brushing up against, hugging, cornering, kissing, fondling, or any other similar physical contact;
- (2) Verbal abuse of a sexual nature, including sexual flirtations, advances, propositions, sexual innuendoes, sexually suggestive, insulting or graphic comments, noises, or sounds;
- (3) Sexually explicit, suggestive or offensive jokes;
- (4) Demeaning, insulting, intimidating, or sexually suggestive comments about an individual's dress, body, appearance, or personal life;

- (5) The display or distribution in the workplace of demeaning, insulting, intimidating, or sexually suggestive objects or pictures, including nude photographs, drawings, or magazine pictures; and
- (6) Demeaning, insulting, intimidating, or sexually suggestive written, recorded or electronically transmitted messages.

G. Prohibition on Bullying

The Company is committed to providing a safe and respectful working environment that is free from workplace bullying and abusive conduct, regardless of whether or not such bullying is tied to a class protected by federal, state, or local law. The Company prohibits and will not tolerate any form of workplace bullying by and against Insight Global employees, supervisors, managers, consultants, applicants for employment, and others in the workplace environment, including clients, vendors, contractors, visitors, and other members of the public. This policy also applies to employer-sponsored events.

Every employee is responsible for maintaining and contributing to an environment that is free from bullying. All employees (including supervisors and managers) are expected to conduct themselves in a manner that demonstrates professional conduct and mutual respect for others. Supervisors and managers must make every reasonable effort to establish and maintain a workplace free of bullying and abusive conduct.

Prohibited Conduct

For purposes of this policy, abusive conduct includes acts or omissions that would cause a reasonable person, based on the severity, nature, and frequency of the conduct, to believe that an employee was subject to an abusive work environment/conduct made with malice, meaning with the intention of harming someone, that a reasonable person would

find hostile, offensive, humiliating, intimidating, and unrelated to an employer's legitimate business interests. This may include but is not limited to:

- (1) Repeated verbal or written abuse, including derogatory remarks, insults, and epithets;
- (2) Verbal, nonverbal, or physical conduct of a threatening, intimidating, or humiliating nature;
- (3) The sabotage or undermining of an employee's work performance;
- (4) Hostile and humiliating comments of professional disqualification expressed in the presence of coworkers; or
- (5) Unfounded threats of discharge in the presence of coworkers.

This list is illustrative only and not exhaustive.

A single act generally will not constitute abusive conduct unless the conduct is determined to be severe and egregious.

Abusive conduct does not include reasonable actions relating to the management and direction of workers, including instructions or expectations, communicated professionally, concerning matters such as:

- Job duties and work to be performed, including shift, post-shift, and overtime assignments
- Workloads and deadlines
- Layoffs, transfers, promotions, and reorganizations
- Work instruction, supervision, or feedback
- Work evaluation
- Performance management, including coaching and counseling
- Discipline, suspensions, or terminations

This policy applies to use of the Company's email and other electronic communication systems or devices.

Any employee violating this policy will be subject to disciplinary action, up to and including termination of employment.

H. Complaint Procedure

Any employee who believes that they are being or have been harassed, discriminated against, or bullied in violation of these policies should promptly go to their immediate supervisor or manager and, orally or in writing, state the specific details of the harassing, discriminatory, or bullying behavior. If the employee finds it difficult or uncomfortable to discuss such a matter with their supervisor or manager (or if the harassment, discrimination, or bullying involves the supervisor or manager), the employee should report the incident to the next highest level of management, to the Human Resources

Department, or <u>EthicsPoint</u>, <u>our Corporate Ethics Hotline</u>. The investigation process will commence as soon as reasonably possible upon presentation of a complaint.

I. <u>Investigation and Confidentiality</u>

The Company will listen to all complaints of harassment, discrimination, or bullying, promptly investigate such complaints, and apply appropriate sanctions it deems necessary or appropriate to end any offensive behavior. If it is determined that harassment, discrimination, or bullying has occurred, the Company will also take appropriate disciplinary action, up to and including discharge of the offending party. Complaints of harassment, discrimination, or bullying will be kept confidential to the extent possible. Employees are required to cooperate fully with any investigation of harassment, discrimination, or bullying.

J. <u>Prohibition on Retaliation</u>

The Company will not retaliate against any employee because of complaints of harassment, discrimination, or bullying or because of cooperation with any investigation. Any employee who believes retaliation has resulted from either the reporting of a complaint of harassment, discrimination, or bullying or from participation in an investigation of such allegations should immediately report this to their supervisor or the Human Resources Department.

K. Questions Regarding This Policy

Any questions or concerns regarding this policy should be brought to the attention of the Human Resources Department, an Insight Global Sales Manager, Regional Manager, or any Officer of the Company. Such inquiries can also be submitted through Insight Global's General Question Form located on the main webpage.