

## **CODE OF CONDUCT** Creating a safe environment



Creating the conditions that enable people, organisations and businesses to thrive

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Our Code of Conduct reflects who we are and what's important to us.

## Introduction from our CEO

Africa is where Insight began over a decade ago in one of the most complex and dynamic regions on Earth. An environment in which circumstances change rapidly and where relationships always matter. We are committed to ensuring that those relationships are managed with an unwavering commitment to the highest standards of business ethics and compliance with national and international codes of conduct and regulation.

Our Code of Conduct reflects who we are and what's important to us. We count on everyone who is part of the Insight Group to follow this Code and make decisions that will preserve the trust and confidence that others have placed in us.

Action lowler

Ashton Towler CEO



## Who must follow our Code of Conduct?

We expect that all our employees and Board members know and follow the Code of Conduct.

The aims of this Code are to set out specific principles in compliance with the International Codes of Conduct, local and international legislation, allowing the operation of the company and any associated companies, to bear scrutiny at an International level.

Failure to observe this Code of Conduct may result in disciplinary action up to and including the termination of your employment.

Whilst the Code is written specifically for our employees and Board members, we do expect that contractors, consultants, advisors, suppliers and any others who may be temporarily assigned to perform work or provide services to Insight will follow this Code in connection with their work for us.

Failure of a consultant, contractor, advisor, supplier or other service provider to follow the code of Conduct may result in the termination of their relationship with Insight.

## Workplace Environment

It's important that we treat each other with respect and dignity. Our employee population is a diverse combination of nationalities and cultures and we promote an environment that is inclusive of all people and their unique abilities, strengths and differences.

We respect the diverse experiences, ideas, backgrounds and opinions that enable us to continually improve and believe that everyone should have an equal chance to succeed.

Our employees are our most valuable asset and we are committed to fostering, cultivating and preserving a culture of diversity and inclusion; harnessing the collective sum of our individual differences, life experiences, knowledge, innovation, self-expression. We want to create a workplace culture that is free of harassment, intimidation, bias and unlawful discrimination.

Our diversity is what drives our competitive advantage as an African based organisation.

## **Example of Fraud**

Colleagues from two different departments are travelling by taxi to a meeting.

The taxi ride costs \$10 and they both make a claim for the ten dollars, sharing the gain of \$10 between them.

This fraudulent claim by a colleague means that the taxi ride has cost Insight \$20.



## Commitment to International Standards and Upholding Human Rights

As a Company we respect the rights of every individual and abide by the employment laws in the markets where we operate.

Insight is aware of violations of fundamental human rights in certain part of the world, including the right to life, the freedom of conscience, religion and association.

Whilst we accept we cannot independently change this reality, we can and will support the protection of human life and dignity within our sphere of local cultural knowledge and influence by subscribing to the principles laid down in the Universal Declaration of Human Rights.

We do not knowingly conduct business with any individual or company that participates in the exploitation of children, including child labour; physical punishment; sexual exploitation and abuse; gender-based violence; forced or prison labour or human trafficking

We are committed to respecting the United Nation's (UN) convention on Human Rights and the International Labour Organisation's (ILO) eight core conventions of fundamental human rights which are: non-discrimination; forced labour; child labour; freedom of association and collective bargaining; harassment; working hours; benefits and wages; leave and employee contracts and letters.

We operate in some challenging, unstable post-conflict environments; and as a member of the International Code of Conduct Association (ICoCA) and a provider of security operations management services within those environments, we are responsible for operating within the provisions of the International Standards Organisation (ISO)18788 and PSC1.

We concede that we may be obliged to employ armed security guards to protect business and/or client activities and assets and employees working in those operations. We do so in accordance with all relevant legislation and standards.

We are committed to respecting and upholding all applicable local and international laws, including criminal, human rights and international humanitarian laws including but not limited to:

- The prohibition and awareness of sexual exploitation and abuse or gender-based violence;
- Measures against bribery, corruption and similar crimes
- The prohibition of torture or other cruel, inhuman or degrading treatment;
- The recognition and prevention of human trafficking and slavery.
- The international Code of Conduct for Private Security Service Providers
- The Voluntary principles on Security and Human Rights

## Statement of Conformance

Insight has developed and implemented a set of policies, procedures and controls that incorporate and conform to the standards, principles and values of:

International Code of Conduct for Private Security Providers;

Montreux document 2008;

Guiding principles on Business and Human Rights; the UN 'protect, respect and remedy' framework 2001;

Voluntary Principles on Security and Human Rights;

ISO 18788: 2015;

ANSI/ASIS PSC 1. 2012.

#### WHAT ARE YOUR RESPONSIBILITIES TO UPHOLD THESE STANDARDS?

- To read and apply this Code of Conduct
- To ensure that you have read and understand our Human Rights and Sexual Exploitation and Abuse (SEA) policies and approaches;
- To inform your manager, or your Country Director or HR manager of any of your concerns;

 To ensure that you uphold our standards and treat everyone you meet and work with, with dignity and respect.

## Asking for guidance, clarification or to voice your concern

If you have a question, concern or require guidance you should speak up and your concerns will be taken seriously. We will treat all reports confidentially as far as it is possible to do so, consistent with the law, Company policy and our need to conduct a thorough investigation.

- In the first instance you're encouraged to speak to your line manager or their manager about your question or concern.
- You can raise your question or concern to your HR Manager.
- You may also contact the whistle-blower email address: whistleblowing@insightsecure.com

Any individual or group raising a malicious claim may be subject to disciplinary action that could lead to the termination of their employment.

#### When you're not sure about what to do, ask yourself:



If you answered yes to all these questions, it's probably ok to continue. If you answered "*NO*" or "*Not Sure*" to any of the questions, you should stop – reconsider – ask for advice – ask for help.

Insight will not tolerate retaliation.

It's extremely important to us that you feel comfortable raising questions or concerns.

We will not tolerate any retaliation or victimisation against someone who raises a concern about actual or potential misconduct in good faith.

Making a report in 'good faith' means that your report or concern is honest, sincere and complete to the best of your knowledge.

However, if it comes to light that a claim against someone has been made with malicious intent, that claim will also be fully investigated and the person(s) making such a claim may be subject to disciplinary action.

## Commitment to Integrity

You are required to uphold the Integrity of Insight. This code of conduct must always be observed and to preserve the integrity of the Company.

## Bribery and Corruption

Honesty and Integrity are the guiding principles for our everyday interaction with each other, our clients and stakeholders. We are transparent and accountable for our decisions and actions.

Whilst working at Insight you may well face difficult situations. On most occasions, your common sense, good judgement, our Code of Conduct and other Company policies and procedures will be enough to guide you.

However, there may be times when you need additional help to make the right choice and you should always feel confident in asking your manager or supervisor, your Human Resource Manager; Country Director or any member of the Senior Leadership Team (SLT).

Bribery and Corruption often have different meanings or definitions. At Insight we don't differentiate.

Bribery can mean receiving or giving money or a favour to encourage someone to do something for you.

Corruption often refers to someone in authority using their power or status to do dishonest or illegal things in return for money or other advantages.

- **Do not** involve yourself or others in corrupt behaviour.
- Do everything you can to prevent bribery and corrupt behaviour by others who conduct business on our behalf.
- Do not use your status to do dishonest or illegal things in return for money or advantage.

A bribe can take many forms and not just cash. Bribes might take the form of a gift or a favour – for example offering a loan or a job offer if it's offered in exchange for a decision or more favourable treatment.

#### **COMMERCIAL BRIBERY**

Commercial bribery generally includes any situation where an Insight employee offers or gives something of value with the intent to improperly influence a business action or decision. It may also include a situation where an employee receives an improper personal benefit in exchange for taking or refraining from taking an action on behalf of Insight.

We will not tolerate this behaviour whether it is done directly or through a third party.

#### **GOVERNMENT OFFICIALS**

This includes officials of government entities, international organisations and political parties, employees of state-owned companies and even employees of government-owned or controlled companies and joint ventures.

Engaging in bribery or even appearing to engage in such activity can expose you and Insight to criminal liability.

Never retain a third party to make an improper payment to a government official or enter into a transaction where you suspect a third party is making such payments. Doing so violates our Code of Conduct and anti-corruption laws.

As a Company we're not only responsible for your actions but also the actions of any third party who represents Insight. Third parties must be carefully screened using our due diligence procedures before retaining them.

Insight abides by the Foreign and Corrupt Practices Act (FCPA); The UK Bribery Act and the legislation of the countries in which we operate.

Behave at all times with the utmost integrity – it's your reputation and that of the Company that's on the line.

Remember that the laws in some countries impose bigger penalties for bribing Government officials – you could end up in prison!

At Insight, bribery of anyone at any level, in any organisation is always wrong and anyone suspected or found to have bribed or been involved in corrupt practices may be subject to disciplinary action up to an including termination of their employment.

Any supplier or contractor providing services to or on behalf of Insight who is suspected of or found to have bribed or been involved in corrupt practices is likely to have their relationship with Insight terminated.

We take bribery and corruption very seriously and may refer cases to the appropriate authorities for prosecution.

#### **RECEIPT OF GIFTS AND ENTERTAINMENT**

Within some of the environments and cultures in which we work it's often quite normal to offer or to be the recipient of a gift, and you may feel that you're being rude or inhospitable if you decline to give or receive gifts.

However, any gift that creates a sense of obligation or compromises your professional judgement is always inappropriate. Giving or receiving gifts to or from government officials is always problematic and must be avoided.

Always politely turn down any offer it if might be perceived as attempting to influence a decision or may appear improper.

In exceptional circumstances, if to refuse an offering would reasonably cause embarrassment or hurt to the person making the offering, you may accept the offering on behalf of Insight and then advise your Country Director, Functional Head or CEO of its receipt, so that an appropriate course of action may be determined.

Gifts or entertainment given or received should:

- Satisfy a reasonable business purpose
- Be nominal in value (no more than \$50)
- 🗢 🛛 Be infrequent
- Be consistent with acceptable business practices given the geographic location and nature of our business
- 🗢 🛛 Be permitted by law
- Not embarrass Insight nor reflect poorly on the Company
- Never be cash, a loan or a cheque.
- Always be recorded

If you gave or received something that then became a matter for public attention, could it be perceived as a bribe? Could it jeopardise the trust that any stakeholder might have in you or the Company?

#### **REPORTING, FINANCIAL OR ACCOUNTING IRREGULARITIES**

You should follow Insight's accounting, reporting and expenses policies and procedures and keep accurate records that enable us to fulfil our financial commitments and provide a view of the financial health of Insight.

Financial information should be prepared and presented in a manner that is open and transparent for both internal and external scrutiny and:

- is accurate and timely;
- represents a true and fair view of the financial performance, condition and position of the company;
- complies with all applicable legislative requirements.

The Company's arrangements for prevention and detection of fraud and corruption will be kept under constant review, and suspected irregularities will be investigated.

Accurate financial records provide the basis on which we can make important strategic decisions.

Always be honest, accurate and complete whether you're completing a time sheet, an expense claim or any other financial statement.

Be alert for any suspicious financial transactions – know your customers (KYC) so that you can prevent any potential illegal financial activity such as money laundering.

If you make a mistake – own up! Tell your manager and agree between you how to rectify the error as soon as possible.

Never falsify any record or account including time sheets and expenses claims.

Falsification of reports also includes personal details, CV, certificates and qualifications.

If you suspect or observe any dishonest or inaccurate record keeping or financial management, no matter how small you must report it to the CFO or through the whistle-blowing email address: whistleblowing@insightsecure.com

## Abusing positions of power

Supervisor has the mandate to decide where guards are posted. The supervisor takes advantage of this position. The Supervisor blackmails the guards. He requires a guard to pay an amount to enable them to be deployed on more favorable posting. The guard feels the need to purchase a more favorable posting and pays up. However, this is an abuse of power and should be reported to the Company.



## Whistleblowing

A whistle-blower is a person, who could be an employee, or other individual who reports wrongdoing in an organisation.

Wrongdoing could be in the form of fraud, corruption, deception; serious misconduct or serious indiscipline; any action to deliberately mislead or other illegal or immoral acts or activities.

If someone has evidence or a strong belief that suggests that an employee of Insight or a representative of Insight has committed or is likely to commit one of more of the following they are strongly encouraged to inform a member of the SLT:

- A criminal offence
- A breach of a legal obligation
- A danger to the health and safety of any individual
- A deliberate attempt to conceal any of the above

If an individual feels unable to speak to a member of the SLT, they should use the whistleblowing email address and provide as much information as possible about the event of activity.

Their anonymity will be protected as far as is possible, although this may not be possible if they are required as a witness in a criminal prosecution.

The email address is: whistleblowing@insightsecure.com

## Our commitment to our Employees and our environment

#### BULLYING, HARASSMENT AND DISCRIMINATION

Insight has a zero-tolerance policy abuse, bullying, harassment or discrimination in any form, as outlined in our Policies against Discrimination. Inappropriate sexual advances or references and/ or unwelcome physical contact is completely unacceptable.

We aim to provide an environment where allegations are taken seriously; where we all have the confidence to report harassment, bullying or discrimination without fear of victimisation.

We believe that our employees have the right to work in an environment free from harassment, bullying and discrimination and to complain about such behaviour should it occur.

If you believe that you've been bullied or harassed by anyone at Insight or by a supplier or other Insight collaborator we strongly encourage you to immediately report the incident to your line manager or Human Resource manager, or both. Line Managers who hear of such an incident should report it to Human Resources. HR will then promptly and thoroughly investigate complaints and take appropriate action.

#### **EQUAL OPPORTUNITIES**

Equality and non-discrimination in employment is a fundamental right at work. Insight will actively promote diversity in the workplace and provide an environment that is free from discrimination and harassment.

Insight will not discriminate at work on the grounds of skin colour; age; ethnicity; religious or political beliefs or affiliations; gender identity or expression; disability; health status; social origin, or employment status.

#### QUALIFICATION, EMPLOYMENT AND TRAINING OF EMPLOYEES

Employees will be selected based on their experience and qualifications appropriate to the role, and we will wherever possible recruit from the local population.

Insight may require employees to undergo physical and mental health checks to ensure fitness for employment.

Employees will be provided with training to enable them to undertake their role in accordance with company policies, procedures and code of conduct.

We may disqualify individuals from employment in the following circumstances:

- Prior convictions
- Dishonourable discharge
- A documented violation of International Code of Conduct principles
- A history of conduct that, to a reasonable person, may affect their judgement in the use of a weapon

#### APPEARANCE AND GENERAL CONDUCT

A professional appearance relative to the environment of the business operation is extremely important. We expect you to familiarise yourself with appropriate local knowledge; customs and courtesies to promote good relations with local communities.

For employees who are required to wear uniform, the Company policy should always be applied.

General conduct is always expected to be of the highest standard and treat everyone humanely with respect for personal dignity and privacy



## Misuse of company property

A security guard is issued with new boots. The boots are very strong and usually last for 2 years. The guard needs some extra money to clear his son's school fees. He decides to sell the new boots for a high price and buy old used boots at a lower price to make a profit.

Three months later the guard requests a new pair of boots because the ones he says he was issued with have fallen apart.

#### HEALTH AND SAFETY AT WORK

Insight commits to maintaining safe and healthy working conditions, equipment and systems of work for all our employees and to provide such information, training and supervision as they need for this purpose. We also accept our responsibility for the health and safety of other people who may be affected by our activities, as far as is possible.

Employees working on client sites or visiting suppliers should also respect the health and safety policy and approach of those clients or suppliers. If Insight's health and safety standards are above those of the client or supplier, you are required to adhere to Insight's standards in order to ensure that your health, safety and welfare is protected.

Employees must inform their manager immediately if they notice any potentially unsafe conditions or practices.

All accidents, injuries and unsafe practices and conditions must be reported immediately and the CEO must be notified immediately of any fatalities or serious incidents.

We are committed to a violence-free work environment and we will not tolerate any level of violence or the threat of violence from our employees, suppliers, consultants, contractors or agents. Individuals who engage in violence or threats of violence may be subject to disciplinary action, up to and including the termination of employment or the termination of the contract or relationship with Insight, as well as possible criminal prosecution.

#### SUBSTANCE ABUSE, DRUGS, ALCOHOL

Employees are not permitted to use or possess alcohol whilst working. Neither should you use or possess illegal drugs or controlled substances whilst at work or on any work-related activity. The mis-use of prescription drugs or over the counter medicines is also prohibited.

Should you suspect that a work colleague is working under the influence of alcohol or drugs you must report this immediately to your manager.

Where for business reasons you are invited to attend a function where alcohol is provided, you're expected to behave responsibly and to avoid excess consumption of alcohol that may lead to you behaving in such a way that brings the company name into disrepute.

Insight may apply drug/alcohol testing in certain environments such as, but not limited to, where employees may be armed or driving. Disciplinary action may be taken where it is found that an employee is working under the influence of drugs, alcohol or other illegal substances.

#### **ENVIRONMENT**

We acknowledge that our activities may have an effect on the environment. To manage our obligations, we undertake to:

- Understand the environmental impact of our activities and treat this as an integral factor in our decision making;
- Make the principles of sustainable development a fundamental part of Insight's business strategies and day to day operations.
- Ensure that our activities are carried out in an environmentally responsible way.

#### SOCIAL RESPONSIBILITY

Insight is committed to improving the quality of life and contributing to the well-being of the communities in which we conduct business. And whilst this support will take different forms in different countries and communities, we shall make every effort to:

- Support health, education and environmental activities;
- Support and work with voluntary and charitable organisations that support community needs;
- Encourage our employees to volunteer for community projects and support them in doing so;
- Give preference to business partner who conduct their business in accordance with ethical standards consistent with our own;
- Recruit from the local labour market as far as is possible.

## Weapons & Use of Force

Insight's vision is to create a safe environment enabling people and businesses to thrive.

We have established procedures for the authorisation of armed personnel in the performance of their duties.

In accordance with Company policies, the suitability of applicants or personnel to carry firearms will be subject to stringent inspections, including (but not limited to) access to previous employment history and records; government/police records consistent with the applicable laws.

When employees are armed, they will only carry firearms legally under all relevant licensing requirements and exclusively for personal protection and the protection for those in their care.

Only fully trained and appropriately licensed firearms users should be in the possession of a firearm during their working hours in order to protect themselves or those in their care.

Employees will take all reasonable steps to avoid the use of force. If force is used, it shall be in a manner consistent with applicable laws and regulations. It shall be appropriate to the threat, the situation and limited to what is strictly necessary.

Lethal force shall only be used in self-defence or the defence of clients against imminent threat of death or serious injury or to prevent the perpetration of a particularly serious crime involving grave threat to you or your client's life.

Employees permitted to use firearms must comply the Company Policy on the use of firearms including the use of force, the use of less-lethal and lethal force.

The loss or accidental discharge of a weapon is taken extremely seriously and may lead to disciplinary action including the termination of your employment and prosecution.

Any other employee found in the possession of any weapon whilst on duty or on Insight premises may be subject to disciplinary action up to and including dismissal.

## Conflict of Interest

A conflict of interest is a situation where you might make a decision based on personal gain rather than the best interest of the Company.

Even just the appearance of a conflict may cause your behaviour or integrity to be questioned.

Conflicts of interest may arise when:

- You have a relationship with a supplier or consultancy firm that would like to do business with Insight.
- You are the hiring manager and you interview a friend/relative who you know is able to undertake the role.
- A romantic relationship between a manager and staff member whose standard of work is poor.

WHAT YOU CAN DO TO AVOID ACTUAL OR PERCEIVED CONFLICTS OF INTEREST:

- Avoid participating in the management of or decision-making related to potential or existing business relationships that involve your friends, relatives, spouse or significant other.
- Romantic relationships can create actual or perceived conflicts of interest and may require Insight to change the working arrangements of the individuals involved.
- Don't use Insight products, services or information in a way that improperly benefits you or someone you know by creating an appearance that you're offering an unfair advantage to someone or to yourself.
- Inform your manager in case of any doubt or question related to conflicts of interest.
- Inform your manager when you are certain there is a conflict of interest and remove yourself from any decision making related to the conflict of interest.

#### **BUSINESS WITH FRIENDS OR FAMILY**

Business relationships with family members and friends can result in a conflict of interest, or the appearance of a conflict. For this reason, you should never be involved with or attempt to influence the bidding, negotiating, or contracting processes between yourself, a family member of close friend and Insight. This rule applies even in indirect situations where you, your family member or close friend owns or works on behalf of another company with which Insight does, or is considering doing business.

Improper relationships at work also need to be avoided.

This means that we may not directly or indirectly supervise, or work under the supervision of, a family member of someone with whom we have a close personal relationship.

#### **OUTSIDE EMPLOYMENT OR BUSINESS INTERESTS**

You must not:

- Operate in any capacity, serve as a director or work as an employee or consultant for any competitor or any current or potential business partner;
- Use the resources of Insight to run private businesses;
- Conduct work for another organisation without the prior approval of your Country Director or HR manager;
- Ensure that any outside employment does not create a conflict of interest or detract from your ability to perform your duties with Insight;
- Benefit either directly or indirectly from opportunities that may arise through the use of Insight's intellectual property, information or your position for yourself; your family or personal associates.

You are required to seek the written approval of the Chief Human Resources Officer (CHRO) before undertaking any paid employment or providing a service, for example but not limited to, consultancy work.

#### POLITICAL, CHARITABLE AND OTHER PUBLIC ACTIVITIES AND BUSINESS AFFILIATIONS

We would not expect that a conflict of interest will arise from a director or employee's affiliation with external professional, political, civic or charitable organisations.

It is recommended that you disclose all memberships especially where you have reason to believe that an invitation to serve in any such organisation was offered primarily because of your involvement with Insight.

Unless approved in advance, in writing, by a member of the SLT, you must refrain from using Insight's property or premises for charitable, political or other purposes at any time.

Safeguarding Company Property and Information

Theft, damage, carelessness and waste have a direct impact on our success and we must all commit to protecting Insight's physical assets from theft, damage, loss or misuse. This includes our facilities, vehicles, business equipment, uniforms and supplies. If you suspect any form of fraud or theft, you should report it to your manager or supervisor immediately.

Never use Insight property for personal gain.

You must return any company property you possess at the end of your employment.

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Never use Insight property for personal gain.

You must return any company property you possess at the end of your employment.

#### INTERACTION WITH THE PRESS AND MEDIA

All requests for information from the press/media must be treated courteously.

Request the name of the journalist, the name of the organisation they are working for, their contact details and the nature of their request. Inform them that you shall pass on their request to the Country Director, Functional Head or CEO.

The only person permitted to speak to the press is the CEO or a member of the SLT with the understanding and permission of the CEO.

#### CONFIDENTIALITY

By the nature of our business the security of information is extremely important. Leaking of information, or the careless disposal of files and documents could affect not only our reputation and our ability to retain and win business but may also affect the safety of the people and assets we protect.

We adhere to the EU General Data Protection Regulations (GDPR). We collect and store information from people around the world. The data that we hold is accessed in accordance with local laws.

You may be working on a project or bid that is highly confidential and may be required to sign a 'non-disclosure agreement'.

If you have a relationship with someone working for a competitor, please ensure that you apply common sense and do not disclose nor solicit confidential information to/from them.

Don't disclose any confidential information about Insight or its partners, suppliers, employees, competitors. You must not take advantage of competitor's confidential information.

Be careful with your use of social media to avoid disclosing any confidential information or sensitive images or data.

You are required to adhere to the company policies related to the Use of information, IT, Social media and any other related policy that may be in force from time to time.

You must never speak on behalf of Insight.

Communication requests about Insight should always be directed to the Country Director or CEO depending on the nature of the information request.

#### PRIVACY, SECURITY AND FREEDOM OF EXPRESSION

We are working in environments where clients need to trust us. Preserving that trust requires that each of us respect and protect the privacy and security of the information that is provided to us.

### Your responsibilities

All of us are responsible for working with each other, our clients and other stakeholders in such a way that the integrity of Insight is always trusted.

We expect you to treat your colleagues, our clients and other stakeholders as you would want to be treated yourself – with respect, dignity and courtesy. We expect you to work safely and report unsafe practices.

If at any time you are aware of a situation that may cause our integrity to be questioned, you must feel confident to do something about it.

This Code of Conduct provides you with a framework upon which you should be confident in knowing what to do in most situations that you'll face.

Should you have any questions, concerns or feedback please speak to your Country Director, your HR manager, the CHRO or the CEO.

We are confident that with each of us committed to working intelligently together, we will succeed in creating the conditions that enable people, organisations and businesses to thrive.

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organisations and businesses to thrive.

We count on everyone who is part of the Insight Group to follow this Code and make decisions that will preserve the trust and confidence that others have placed in us.

