

# Modern Slavery Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Insight respects the international human rights principles encompassed by the Universal Declaration of Human Rights, including those contained within the International Bill of Rights and the International Labour Organization's 1998 Declaration on Fundamental Principles and Rights at Work. Insight fully supports the goals of anti-modern slavery laws around the world, including the transparency and reporting regimes set out in such laws as the Australian Modern Slavery Act 2018, the U.K.'s Modern Slavery Act 2015, and the California Transparency in Supply Chains Act 2010. We strive to respect and promote human rights in accordance with the [United Nations Guiding Principles](#) on Business and Human Rights in our relationships with our employees, suppliers, and partners. Our Code of Conduct, [Vendor Code of Conduct](#), Corporate Citizenship Report and [Human Rights Policy](#) support our culture.

In so far as the Australian Modern Slavery Act 2018 is concerned, this statement is made by Insight Enterprises Australia Pty Ltd. on behalf of itself and its subsidiaries for purposes of section 13 of that Act. Insight Enterprises Australia Pty Ltd. is a wholly owned subsidiary of Insight Enterprises, Inc.

For purposes of the U.K.'s Modern Slavery Act 2015, this statement is made by Insight Direct (UK) Ltd.

For purposes of the California Transparency in Supply Chains Act 2010, this statement is made by Insight Direct USA, Inc. and Insight Public Sector, Inc.

This statement covers the period 1 January 2021 to 31 December 2021.

## ORGANIZATION'S STRUCTURE AND BUSINESS

Insight is a leading global single source provider of IT products and services. From computers, laptops, hardware and software to services, we bring together expert knowledge, vendor accreditations, digital transformation and a full global presence. We are a reseller of commercial off the shelf information technology products and services. We also provide some of our own services to our customers. We offer products from thousands of suppliers, including but not limited to such industry leaders as Microsoft, Cisco, Dell/EMC, HP, Inc., Lenovo, VMWare, and Adobe.

Our market includes the worldwide market for information technology. A client's information technology services needs span an array of business priorities including modern infrastructure and cloud options, workforce productivity initiatives, and leveraging information technology to

differentiate from their competitors. Whether implementing public cloud or as-a-service workplace solutions, designing a next generation or hybrid cloud data center, or leveraging sophisticated IoT and artificial intelligence solutions to improve our clients' experiences, we provide technical expertise and advisory services to our clients as a single solution integrator, powered by decades-long partner relationships and expertise to supply them the hardware, software and services required to support their technology needs. Our unique go to market strategy is supported by a strong operational platform that includes scalable information technology and e-commerce systems and processes, robust digital marketing capabilities, and a culture of continuous business process transformation and automation.

Our principal executive offices are located in Arizona with additional locations throughout the United States. Outside of the United States, we have operation centers in Australia, Canada, France, Germany, India, Philippines and the United Kingdom, as well as sales offices throughout EMEA and APAC.

We employ approximately 12,000 people around the world.

Insight Enterprises Australia Pty Ltd. operates in Insight's Asia Pacific region. It acts as the lead Asia Pacific operation for Insight and has five subsidiaries: Insight Technology Solutions Pte Ltd (Singapore), Insight Enterprise Limited (NZ), Ignia Pty Ltd (Australia), Insight Enterprises Hong Kong and Insight Enterprises (Shanghai) Co. Ltd. (China). All operational policies and procedures come from the corporate U.S. headquarters and are applied by Insight Enterprises Australia Pty Ltd. to itself and its subsidiaries. All of the companies implement the corporate strategy and operations of Insight Enterprise as discussed above.

## **OUR SUPPLY CHAINS**

Our supply chains include thousands of different tier 1 suppliers from around the world including hardware manufacturers, software vendors, service providers and distributors. As noted above, some of these suppliers are among the world's largest companies with extensive and global supply chains of their own.

## **RISKS OF MODERN SLAVERY**

Given the nature of our business (the supply of IT products and services), the high levels of education and training required of our staff members, the location and visibility of our operations, and the strength of our corporate policies, the risk of modern slavery occurring in our core operation is very low. However, Insight does recognize that there may be modern slavery risks within our supply chains as they are lengthy, complex, scattered globally and include a wide range of manufacturers and service organizations.

## **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our [Global Human Rights Policy](#) reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and

enforcing effective systems and controls to ensure slavery and human trafficking are not taking place anywhere in our supply chains.

We are signatories to the United Nations Global Compact and uphold these principles in our business and in our wider supply chains. [Our Code of Conduct](#), [Supplier Code of Conduct](#), and [Global Human Rights Policy](#) lay down the expectations that we have of our employees and suppliers in the conduct of our business activities globally. These expectations have been informed by international standards and conventions including, among others: the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, United Nations Global Compact, Rio Declaration on Environment and Development, United Nations Convention Against Corruption, the United Nations Conventions on Rights of the Child, and the International Labour Organization's (ILO) 1998 Declaration on Fundamental Principles and Rights at Work.

## **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

As part of our initiative to identify and mitigate risk we:

- have in place systems to facilitate and encourage the reporting of concerns and to protect whistleblowers, including access to our Global Compliance Officer and incorporating a strict no retaliation policy;
- expect all points in our supply chains to adopt suitable anti-slavery and human trafficking policies and processes;
- are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains;
- require all employees to complete compliance training; and
- the vetting of suppliers identified as high risk throughout our global network.

## **SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS**

We have zero tolerance to slavery and human trafficking and we expect all our suppliers to adopt similar ethics and values.

We have contractual commitments from suppliers to adhere to law.

## **TRAINING**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training on modern slavery as part of a wider ethics training program.

## **REMEDATION**

In the event that an incident of modern slavery was discovered in our supply chain, Insight would immediately take such a discovery to the partner or supplier at issue. Insight would work with the partner or supplier at issue to remove any confirmed violation of the principles or terminate business with the partner or supplier at issue if the finding was disregarded or continued.

## ASSESSING THE EFFECTIVENESS OF OUR ACTIONS IN COMBATING SLAVERY AND HUMAN TRAFFICKING AND KEY PERFORMANCE INDICATORS

We are committed to having transparency in our supply chains to remove slavery and human trafficking.

We have required staff to complete training on modern slavery as part of a wider ethics training program.

We continue to review our policies and procedures to ensure those policies and procedures reflect best practice and that any instances of modern slavery or human trafficking are detected and reported through the appropriate channels. These reviews are conducted by our Compliance Department under the oversight of our Board of Directors.

### CONSULTATION

As noted above, all the operational policies and procedures of all companies within our group derive from our corporate US headquarters and are applied consistently across all our operations. This ensures that all entities within the Group understand the standards expected of them and are aware of the actions they need to take to ensure that risks of modern slavery in their operations and local supply chains have been identified, assessed and addressed.

For purposes of the Australian Modern Slavery Act 2018, this statement was prepared in consultation with each of the subsidiaries of Insight Enterprises Australia Pty Ltd and those subsidiaries have approved this statement in so far as it concerns their own operations and supply chains.



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This statement has been approved by the Board of Directors and signed by Russell Leighton (Director) on behalf of Insight Direct (UK) Ltd.



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Mike Morgan on behalf of Insight Enterprises Australia Pty Ltd.

*Lisanne Steinheiser*

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Lisanne Steinheiser on behalf of Insight Direct USA, Inc. and Insight Public Sector, Inc.

31 March 2022

# Global Modern Slavery Statement Final 2022

Final Audit Report

2022-03-15

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