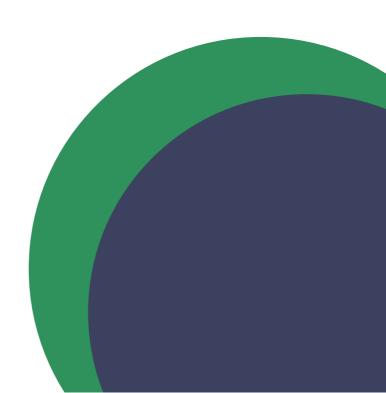


### **INSIGHT222**

## BUSINESS CODE OF CONDUCT



### Message from the Chief Executive Officer



Work at Insight222 is based on our strong mission "to make organisations better by putting people analytics at the centre of business and upskilling the HR profession." Fundamentally our mission is about helping organisations get more value from their people.

With this mission in mind, we recognise therefore how we act as employees in Insight222 and how we are perceived by our clients is an integral part of our operations and activities. We want our clients to recognise that we run our business ethically, with honesty and integrity, and with the desired accountability and responsibility to all our stakeholders: Our clients, our partners, our suppliers, and the wider community.

Our Business Code of Conduct sets out the policies and practices that we adhere to, in order to deliver on that commitment. Each employee at Insight222 is asked to understand and comply with this Business Code of Conduct which, together with our "Work at Insight222" policies, establishes the framework for how we conduct business, promote the interests of our employees, and ensure Insight222 is a trusted, valued partner to its clients and suppliers.

**Jonathan Ferrar, Chief Executive Officer** 

## Table of Content

#### **INTRODUCTION TO INSIGHT222**

- **3** Our Mission
- **3** Our Vision

#### **INSIGHT222 CULTURAL VALUES**

- 4 Communication
- 5 Accountability
- **5** One Firm
- 6 Expertise

#### **COMPLIANCE WITH LAW**

- **7** All Laws
- 7 Anti-Corruption & Bribery
- 7 Sanctions

#### **RIGHTS OF OTHERS**

- 8 Human Rights
- 8 Anti-Slavery
- 8 Diversity & Inclusion

#### **INFORMATION INTEGRITY**

9 Privacy & Confidentiality

#### **COMPLIANCE WITH LAW**

- **10** Sustainability
- 10 Our Partners & Suppliers
- 11 A Healthy Workplace

## Introduction to Insight222

Since the early days of our business in 2017, clients have experienced Insight222 in a number of ways. Whatever the forum, through our people, systems, platforms, events, podcasts, research, and content, Insight222 has always aimed to deliver with exceptional levels of quality, service, and commitment to help our clients be successful. By doing so, we believe we can achieve our purpose, through our mission and vision.

### **Our Mission**

To make organisations better by putting people analytics at the centre of business and upskilling the HR profession

### **Our Vision**

To improve the world of work by being the undisputed leader in transforming HR to become data-driven

## Insight222 Cultural Values

At Insight222 we consider our greatest strength to be openly discussing our culture and the values that underpin that culture.

Our cultural values are built on a "Freedom within a Framework" principle, underpinned by four themes: Communication, Accountability, One Firm, Expertise. Each of these themes is explained by certain behavioural attributes that were initially developed by the entire Insight222 team in 2021.

Experience has proven that allowing staff freedom to perform their duties with some guidance around expectations (i.e., a framework) allows them to perform at their best while being supported in their endeavours.

The framework reflects our commitment to diversity, inclusion, and opportunities for all people. It also encourages fair, open, and honest interaction between colleagues. Harassment and discrimination are not tolerated, at any level, in any situation across the firm.



- Get to know your colleagues on a personal level to understand their motivational drivers and preferred ways of communicating
- Embrace a communication style that is grounded in direct candour but is also respectful, to support individual growth
- Welcome open and empathetic feedback, aimed at benefiting you personally and Insight222
- Be humble, consider your own development areas and knowledge gaps
- Question with curiosity rather than emotion; If you find yourself reacting to a request, take a moment to ask a clarifying question

## Insight222 Cultural Values



- Take ownership of the impact your behaviour and actions have on those around you, the projects you're working on and the overall business
- Seek feedback to increase your self-awareness and strive to understand the impact you have on others
- Be open to discuss failures, learn from your mistakes and think of ways to improve in the future
- Be confident in leading projects and taking ownership of your decisions
- Ensure that the decisions you take are always in the best interest of Insight222, and be able to justify them



- Be curious about each others' work and consider how collective strengths and capabilities can support Insight222
- Consider interdependencies between your work and that of others to mitigate risks and reduce the likelihood of unforeseen negative impact
- Help each other & recognise when people need your support, even if that's outside your job description
- Embrace the differences that make us unique and leverage those to deliver better outcomes
- Take time to recognise and celebrate company and individual wins

### Insight222 Cultural Values



- Dedicate time in the week to focus on the most important activities, ensuring you have a balanced number of meetings, on a daily basis
- Consider the skills you want or need to develop your expertise and discuss with your manager how you can best build those
- Make space for learning in the work week
- Socialise & seek feedback on your ideas to ensure you capture different perspectives and make informed decisions
- Openly discuss your learning activities with the team to enable others to follow your example

# Compliance with Law

#### **All Laws**

We respect and observe all relevant national and international laws and regulations.

### Anti-Corruption & Bribery

A zero-tolerance approach is applied to bribery and corruption at every level in the firm. Our full Anti-Corruption and Bribery policy applies to all employees of Insight222 and its affiliates. It is also relevant for our dealings with our contractors, freelancers, partners, and suppliers.

Insight222 upholds all laws relevant to bribery and corruption, in particular, the Bribery Act (UK) 2010 and the U.S. Foreign Corrupt Practices Act. We will ensure that any behaviour we see that amounts to bribery or corrupt practices is called out and addressed with the utmost seriousness.

All staff are required to ensure they are familiar with the details of this policy and to keep proper records of hospitality expenditure. The Company will check compliance with the policy from time to time.

#### **Sanctions**

Insight222 complies with all applicable export control laws and sanctions worldwide. Our sales and contract management teams are responsible for ensuring that we have no dealings with individuals and countries subject to sanctions or controls.

## Rights of Others

#### **Human Rights**

Respect for people - be they fellow co-workers, employees at our partners, suppliers and clients or members of our wider community - is core to Insight222's cultural values. We respect and support the values and principles set out in the UN Guiding Principles on Business and Human Rights, the Declaration of Human Rights, and the implementation of those rights into domestic and international law.

#### **Anti-Slavery**

We comply with the law and the spirit of the UK Modern Slavery Act and ensure our own employees are not subject to forced or compulsory labour. We also enquire of our suppliers to ensure that they, also, are respectful of the laws and good practices.

#### **Sanctions**

Insight222 complies with all applicable export control laws and sanctions worldwide. Our sales and central contract management teams are responsible for ensuring that we have no dealings with individuals and countries subject to sanctions or controls.

### Diversity & Inclusion

We recognise that all aspects of diversity in our workforce and our wider community is to be promoted and that our employees must respect colleagues, clients, and suppliers irrespective of their backgrounds or beliefs. Discrimination is not tolerated within our organisation, and we are committed to creating an inclusive and psychologically safe working environment that attracts a diverse workforce and allows everyone to fulfil their career goals.

# Information Integrity

### Privacy & Confidentiality

In addition to safeguarding our own confidential information and employee data, we understand that we are often trusted with valuable and sensitive information belonging to our clients. We are also often required to process personal data belonging to the employees of our clients.

We take our responsibilities with respect to confidential information and personal data very seriously. All our staff receive periodic training in the protection of confidential information and the proper treatment of personal data (both belonging to Insight222 and our clients and partners). Documents containing confidential information are appropriately marked, stored, and deleted. We ensure that the suppliers we rely on to help deliver our services (such as IT service suppliers) are contractually bound to confidentiality and data processing provisions.

We operate an information security policy, to which all our staff are subject, that covers security of Insight222 assets and information. All devices are password protected, access to our IT systems requires authentication and our systems and shared drives can only be accessed by Insight222 employees with relevant permissions. These permissions are regularly updated.

All our employees receive training with respect to ethical behaviour in the workplace and are coached in how to handle sensitive client engagements. We ensure that we act, so as to avoid conflicts of interest and senior management within our Company are always available to advise employees if they have questions.

# The Wider Community

#### **Sustainability**

Insight222 is quick to undermine the importance of making decisions that minimise the environmental impact of our operations.

Whilst our business is relatively small and operates with a low carbon footprint, with most of our activities being delivered in a virtual manner, we encourage our employees to be thoughtful about sustainability, by adopting practices in their day-to-day work life. These include limiting document printing, recycling appropriately and taking sensible decisions about transport and energy consumption. We operate a fully hybrid workplace practice with only a 20% expectation on time to be spent in an office environment, therefore limiting unnecessary travel.

## Our Partners & Suppliers

We recognise that Insight222 is only a part of the picture. When it comes to promoting people analytics and upskilling HR practitioners, we rely on many partners and suppliers to co-deliver our services.

While we don't control the thinking and approach of all our partners and suppliers, we do check regularly to ensure that they respect the values that we respect and, where necessary, are contractually bound to uphold the commitments we adopt in relation to business ethics, confidentiality, and security.

# The Wider Community

### A Healthy Workplace

We provide a healthy and safe working environment for our employees, through our Working from Home policy and our relationship with our landlord in London at Uncommon. Facilities are monitored and we regularly discuss health and safety with employees, including on their home office situation, to make sure they have a healthy workplace that allows them to be productive.

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