

**INSIGHT ENTERPRISES, INC.**  
**POLICY ON FAIR DISCLOSURE TO ANALYSTS AND INVESTORS**  
**(Effective 8-4-2003)**

We are committed to fair disclosure of information about Insight Enterprises, Inc. and its subsidiaries ("Insight Enterprises") without advantage to any particular analyst or investor, consistent with Regulation FD - Fair Disclosure ("Regulation FD") promulgated by the Securities and Exchange Commission (the "SEC"). We will continue to provide current and potential stockholders access to all material information concerning Insight Enterprises in accordance with all applicable securities laws. We also will provide investors access to certain executive management personnel when practicable and consistent with Regulation FD. We believe it is in Insight Enterprises' best interest to maintain an active and open dialogue with stockholders, analysts and potential investors regarding our historical performance and future prospects while complying fully with all applicable securities laws.

**COMPLIANCE**

Our intent is to comply with all periodic reporting and disclosure requirements contained in all applicable securities laws, including Regulation FD. It has been, and will continue to be, our practice to disclose material information about Insight Enterprises publicly, not selectively. Insight Enterprises expects strict compliance with this policy by all directors, officers and employees. Failure to follow the letter and the spirit of this policy will be considered a matter of extreme seriousness and a basis for termination of employment.

**COMPLIANCE GUIDELINES**

Insight Enterprises has established the following guidelines to ensure compliance with Regulation FD and to avoid selective disclosure of non-public material information.

**1. Disclosure**

We will post this Policy, and any changes to this Policy, as they occur, on the investor relations section our website.

**2. Authorized Officers of Insight Enterprises**

- a. Only the Chief Executive Officer, President, Chief Financial Officer and Senior Vice President of Finance of Insight Enterprises, Inc. ("Authorized Officers") are authorized to communicate on behalf of the Company with analysts, securities market professionals, stockholders and others covered by Regulation FD ("Designated Persons") or with representatives from major business media.
- b. Employees other than Authorized Officers ("Other Employees") may communicate on behalf of Insight Enterprises, Inc. with Designated Persons or with representatives from major business media only after receiving prior approval from an Authorized Officer and, where practical, only when an Authorized Officer is present. Other Employees may communicate with trade or industry media (as distinguished from major business media)

representatives about one of its subsidiary's operations as part of the Company's or one of its subsidiary's public relations program or with media representatives from major business publications only after receiving prior approval from an Authorized Officer.

c. No employee is authorized to communicate any information about Insight Enterprises that is material non-public information, except through public disclosure made in a manner authorized by an Authorized Officer or Insight Enterprises' General Counsel.

d. To the extent practical, at all pre-scheduled meetings, conference calls or other communications with Designated Persons, at least two employees should be present, one of which is an Authorized Officer.

e. Employees will be notified that they should refer all questions concerning communications with Designated Persons to the Senior Vice President of Finance of Insight Enterprises.

f. Appropriate training has been, and will continue to be, provided to each Authorized Officer on compliance with this Policy.

### **3. Quarterly Earnings Release Conference Calls**

a. We will issue quarterly earnings releases.

b. Shortly after the issuance of each quarterly earnings release, we will hold an analyst conference call which will be open to the public and the media via webcast (in listen-only mode) with respect to which advance public notice will be made through a media release, by electronic distribution, and by posting on our website.

c. A playback of the conference call will be provided on our website for a limited time after the conference call.

d. We may provide guidance relative to Insight Enterprises' financial goals. All guidance, and changes to or affirmations of guidance, will be provided through public disclosure, such as media releases or conference calls open to the public.

e. We will continue to use the safe harbor guidelines contained in the federal securities laws for forward-looking information when conducting any communications with Designated Persons as part of individual, group, and conference communications formats.

### **4. Analyst Reports and Models**

We may review draft analyst reports and models but only to confirm the accuracy of publicly disclosed facts. We will not otherwise review or make any comment on analyst reports or models. We will communicate in writing to each analyst that our reviews of any reports will be limited to the accuracy of factual information contained therein as of the date of our review and our review should not in any way be viewed as agreement or acquiescence on our part with the projections, predictions or opinions set forth therein.

## **5. Quiet Period**

Between the end of each quarter and the announcement of our financial results, we observe a "quiet period" during which we do not comment on Insight Enterprises' operations, financial performance or financial outlook to Designated Persons or media representatives.

## **6. Presentations**

a. We will continue to participate in certain securities-firm-sponsored and other conferences. It will be our practice to issue media releases in advance of those presentations, and to post those presentations on our website. It is our intent to participate only in conferences where our presentations are webcast.

b. Authorized Officers will continue to meet with individual Designated Persons and groups of Designated Persons. Similarly, we will continue to participate in other public meetings at which Designated Persons could be present, including industry seminars, trade shows and employee meetings. We do not intend to disclose any material, non-public information during these meetings. However, if it is determined that material, non-public information has been disclosed unintentionally, appropriate public disclosure in accordance with Regulation FD will be made.

## **FURTHER INFORMATION ABOUT THIS POLICY**

All inquiries regarding the provisions or procedures of this Policy should be addressed to Insight Enterprises' General Counsel, Chief Financial Officer or Senior Vice President of Finance.