

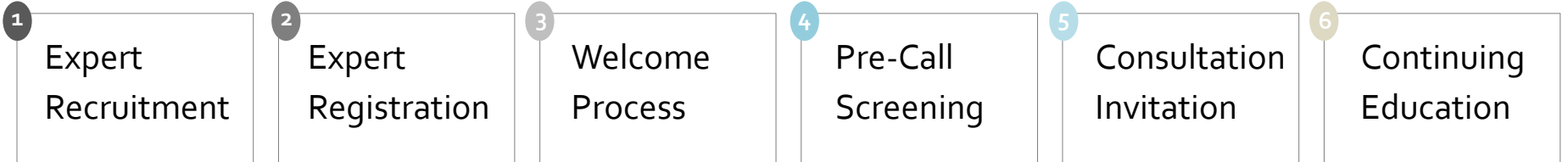
COMPLIANCE

PRIMARY INSIGHT COMPLIANCE

We understand the importance of compliance and transparency

At Primary Insight, compliance is at the foundation of our company. Strong compliance provides tremendous value to our clients, our experts, and our employees. It is an essential feature of our firm, and we are dedicated to leading the industry with rigorous compliance practices at every step of our consultation process. Our compliance process has been developed through independent legal counsel worldwide, security laws, and industry best practices, managed by veterans of the expert network industry.

Compliance Process



1 Expert Recruitment

Expert Recruitment

Pre-vetting – At the start of the recruitment process, our experienced Client Service Managers pre-vet potential experts to ensure eligibility for consultations as well as instruct the expert on compliance issues. Experts are told to not disclose non-public information and not participate in any calls that would create a conflict of interest or violate any existing agreements.

2 Expert Registration

Expert Registration

Terms and Conditions – As a condition of registration, experts must agree to comply with our Terms and Conditions. Primary Insight’s Terms and Conditions are continually refined through independent legal counsel specializing in compliance as well as industry best practices.

Expert Compliance Tutorial – Another mandatory part of the registration process is the online compliance tutorial. Before an expert can participate in a consultation, the expert must mark that he/she has completed our online tutorial and fully understands what he/she can and cannot discuss. The online tutorial provides an additional layer of compliance protection as well as an excellent guide for experts.

3 Welcome Process

Welcome Process

Welcome E-mail – Following registration, experts are sent a welcome e-mail reminding them of Primary Insight’s compliance policies as well as the Terms and Conditions. (Sample Language: “Your participation in our network is subject to the Terms and Conditions laid forth in your previously submitted online application... you should not participate in any consult if participation creates a conflict of interest and/or violates or conflicts with any agreement, obligation or duty you may have to any other person or entity.”)

4 Pre-Call Screening

Pre-Call Screening

Pre-call Vetting – For every project, potential experts are vetted again by our Client Service Managers to ensure the quality and relevance of the expert as well as remind the experts of the obligations they hold by agreeing to our Terms and Conditions. At this time, Client Service Managers also ensure that experts have completed the compliance tutorial.

5 Consultation Invitation

Consultation Invitation

Consultation Invite – After the consultation is scheduled, experts are sent an invite to the consultation (through our newly-developed consultation management system) which contains any custom compliance terms the client has set forth as well as a disclaimer on their obligation to the Terms and Conditions.

6 Continuing Education

Continuing Education

Expert Portal Updates – In order to maximize their consultation opportunities, experts are recommended to regularly log-in to the Expert Portal in order to update their biography and review compliance policies. Experts are also notified by email anytime our compliance policies are updated.

Compliance Technology

We are continually developing our proprietary technology with the primary goal of enhancing the experience of both clients and experts.

- *Expert Portal*: Online login/ Update bio and review T&C/ Keep track of consultation completed and billing/ Manage consultation schedule.
- *Client Portal (Users)*: Online login/ Submit new project requests/ Review each proposed consultant with resume and details/ Manage and keep track of consultation scheduling.
- *Client Portal (Compliance)*: Manage all requested projects and calls/ See each proposed consultant with resume and details/ Approve or Deny requests online with automated response to user/ Produce summary report of calls with customizable period and compliance reports.

Additional Layers of Compliance

- *Compliance Team*: Primary Insight’s team of directors and legal counsel are always available to handle compliance issues.
- *Corporate Registry*: Primary Insight provides a registry that allows companies to supply policies that affect their employees’ ability to participate in consultations.
- *Compliance Training*: Routine compliance training is available for both experts and clients. Primary Insight offers e-seminars and on-site training throughout the year, led by our compliance team.
- *Feedback System*: Client and Expert Portals allow for continuous feedback on compliance from both sides of the consultation.
- *Employee Policies*: Employees at Primary Insight all abide by a confidentiality agreement whereby all employees agree to not disclose or to attempt to use or personally benefit from any confidential information that is disclosed by our Clients or known by the employees.