

Open Door, Anti-Retaliation and Review Policies

An integral part of our Code of Conduct is real-time input on workplace issues from all members of the ScanSource family, including all members of management and employees (“ScanSource employees”). In order to foster this goal, ScanSource has adopted the following Open Door Policy, Anti-Retaliation and Review Policies.

Open Door Policy

ScanSource encourages ScanSource employees to discuss their problems, suggestions and concerns with management. Moreover, all ScanSource employees are obligated to promptly report any concern about a possible violation of ScanSource’s Code of Conduct or violation of any applicable law.

To facilitate ScanSource employees to raise their problems, suggestions, concerns or report potential violations of ScanSource policies or applicable law, ScanSource employees have several options that they are free to choose from. ScanSource employees may discuss any issues with: (i) their direct manager; (ii) any member of management within their reporting chain; (iii) any member of executive management, including their business unit president or the CEO Michael Baur; (iv) Human Resources; (v) any member of ScanSource’s legal department; or (vi) ScanSource’s audit committee via an email addressed to BoardofDirectors@scansource.com. Any recipient of such communication, must notify ScanSource’s legal department promptly if the reported concern involves any possible violation of ScanSource’s Code of Conduct or violation of any applicable law.

In the event that a ScanSource employee is not comfortable with directly raising any issues or concerns they may do so anonymously be either calling one of the toll free hotline numbers in the language of their choosing or via the internet portal. The complete list of toll free hotline numbers can be found on the Company’s intranet page. Likewise, a link to the confidential web portal may be found on the Company’s intranet page. A ScanSource employee is free to use any of these communication options. ScanSource employees are encouraged to try any of the alternative communication channels if they feel that their concerns have not been adequately addressed under the initial avenue. All such communications will be treated as confidential and only shared on a “need to know basis” or as otherwise required by law.

In the event that a ScanSource employee elects to raise any issues anonymously via the hotline or web portal, the ScanSource employee will be given an access code. This access code will allow the ScanSource employee to check on the status of their communication, as well as provide a method by which ScanSource may seek additional information regarding the communicated issue.

Anti-Retaliation Policy

ScanSource seeks to maintain a spirit of openness concerning its compliance with applicable law and policies. As a result, ScanSource forbids any retaliation against any ScanSource employee that communicates any concern or reports any potential violation of ScanSource policy or applicable law. No employee or member of management shall take any action designed to retaliate against any ScanSource employee for reporting a concern or potential violation of ScanSource policy or applicable law. Any ScanSource employee that engages in retaliation – directly or indirectly – will be subject to discipline, including termination from the company.

It shall also be a violation of this policy for any ScanSource employee to investigate the origin of any communication under the Open Door Policy that was submitted anonymously.

Review Policy

ScanSource values any communication under the Open Door Policy. ScanSource has adopted a formal review process for any communication under the Open Door Policy that relates to any potential violation of the Code of Conduct or any applicable law. Upon notification of any such communication under ScanSource's Open Door Policy, ScanSource's legal department will review the communication and assign it to the appropriate avenue of review within five business days of receiving the reported communication. Any communication relating to an employment or benefits concern, will be referred to ScanSource's Human Resources Department for review. Any communication relating to a potential violation of the Code of Conduct or applicable law will be reviewed by the legal department.

In conducting their review, the Legal or Human Resource Department may use ScanSource internal resources or use outside resources, such as counsel, consultants or forensic accountants, to assist ScanSource's review of the conduct underlying the communication. Moreover, every ScanSource employee is required to cooperate with ScanSource's review and to maintain the confidentiality of the existence of the review and his or her interactions with anyone conducting or participating in the review. For those ScanSource employees that submitted anonymous communications via the hot line and web portals, ScanSource encourages those employees to use their access codes to monitor the status of the review and provide any requested follow-up information that may be required to complete the review. Failure to cooperate in with a ScanSource review is grounds for discipline, including termination of employment.

ScanSource's Legal or HR Department will use their best efforts to complete the review of the communication under the Open Door Policy between 90 and 120 days from the receipt of the communication concerning potential violations of the Code of Conduct or applicable law. The results of the review will be communicated to ScanSource's Audit Committee. ScanSource reserves the right to share the results of its review, as well as any evidence gathered during that process, with the appropriate governmental body where there is a suspected violation of the law or to make any disclosures required by law.

If ScanSource determines that there has been a violation of its policy or applicable law, ScanSource, in its sole discretion, will take appropriate disciplinary action, including reprimand, suspension (with or without pay) and termination of employment. In imposing disciplinary action, ScanSource may consider, among other factors, the nature of the violation, whether the conduct was intentional, whether the ScanSource employee self-reported the violation, and the degree to which the violation exposes ScanSource to adverse legal consequences or harms its reputation in the community or industry.

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THIS POLICY IS NOT AN EMPLOYMENT CONTRACT. EMPLOYMENT IS AT-WILL.