

Global Human Rights Policy

Doc Ref: V. 5.0
Date: July 13, 2022
Contact: General Counsel
Dept.: WW Legal
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Environment, Social, and Governance

1. PURPOSE

Ingram Micro Inc., a Delaware corporation (hereinafter “Ingram Micro”, “we”, “us” or “our”) supports the protection of human rights globally. This policy is designed to help us comply with all applicable laws and regulations that protect human rights.

2. POLICY

We do not condone human rights violations, and we strive to comply with all applicable laws and regulations that protect human rights. We pursue company-wide conformance to international human rights standards, and we consider the implementation of processes and business controls to help with such conformance. We expect the same of our Ingram Micro entities, associates, and business partners throughout our supply chain. We do not knowingly conduct business with business partners that are not aligned with the statements outlined herein.

A. LABOR

We are committed to upholding the human rights of our associates, and we are committed to treat our associates with dignity and respect as understood by the international community.

We are committed to complying with all laws and regulations related to anti-slavery and human trafficking. Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery, or trafficking of persons by any party shall not be used. Additionally, we will not use child labor, and laws and regulations as it relates to child workers are expected to be complied with on a jurisdiction-by-jurisdiction basis.

We are committed to protecting the rights of women, minority groups, and other underrepresented groups, and we are committed to equal employment opportunity through various ways, including but not limited to signing onto the United Nations Universal Declaration of Human Rights. Further, we prohibit discrimination based upon race, color, ethnicity, religion, creed, sex (including pregnancy, childbirth, or related medical conditions), national origin, immigration status, ancestry, age, marital status, protected veteran status, military service, disability, medical condition, genetic information, sexual orientation, gender identity, gender expression, or on any basis prohibited by applicable law.

We are committed to complying with all applicable health, safety, and environmental laws and regulations.

B. CONFLICT MINERALS

In August 2012, the U.S. Securities and Exchange Commission (“SEC”) issued rules requiring certain companies disclose the extent to which the products such companies manufacture or contract to manufacture contain conflict minerals sourced from mines in the Democratic Republic of the Congo or surrounding countries that may finance armed conflicts in the region and resulting in human rights violations there.

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We are a technology distributor, and we are not directly involved with the manufacturing of products or the purchasing of conflict minerals. As a technology distributor, we are not able to certify as to the country of origin of the minerals contained in the products manufactured by our business partners. We support the objectives outlined by the SEC as they relate to conflict minerals, and we are committed to working with our customers to supply products that meet their specifications.

3. RESPONSIBILITIES AND PROCEDURES

Human rights violations by Ingram Micro associates will be investigated on a case-by-case basis and may result in disciplinary action, up to and including termination.

All human rights violations or suspected violations shall be reported to the ethics hotline immediately at <https://secure.ethicspoint.com/domain/media/en/gui/33815/index.html>. In addition, employees may contact the Chief Compliance Officer, the Human Resources department, or the Legal department. Associates who report human rights violations or who voice concerns about suspected violations will not be retaliated against under any circumstances (as is outlined in our [Code of Conduct](#) and our [Non-Retaliation Policy](#)).

Associate reports of human rights violations or suspected violations must be investigated as soon as possible, including notification of authorities where necessary. Appropriate corrective actions must be implemented for each incident to prevent recurrence.

4. REVISION HISTORY

Name/Role	Date	Details
C. Duke/Author	Nov 1, 2015	New policy.
C. Duke/Author	Dec 8, 2016	Revised to reference EICC Code of Conduct in Definitions and Policy statement, expanded labor and health & safety sections to mirror EICC standards, and added supplier adherence to Responsibilities section. Added CSR Manager responsibility for implementation of management system. Removed reference to "conflict resources." Added recommendation for supplier use of OECD guidelines and outlined consequences for non-adherence to this policy. Updated responsibilities and inserted link to ethics hotline.
C. Duke/Author	Feb 9, 2018	Updated all references to EICC to RBA and updated sections A and B in alignment with version 6.0 of the RBA code of conduct.
C. Duke/Author	Feb 17, 2020	Added reference to the Australian Modern Slavery Act. Updated links. Deleted section 6. Related Policies, as these are linked within the document. Extended applicability to business partners and added BU leader responsibilities. Added explicit commitment to address industry-specific human rights risks. Updated list of approvers.

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A. Aragone/Author	July 13, 2022	Revised policy.
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5. EFFECTIVE DATE

July 13, 2022

6. APPROVALS

APPROVALS

1. Author

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July 13, 2022

Date

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