

Global Human Rights Policy

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Corporate Social Responsibility

1. PURPOSE

Ingram Micro supports the protection of human rights globally, directly within operations we control and indirectly by exerting influence on our supply chain. In alignment with the [Universal Declaration of Human Rights](#), the [UN Guiding Principle on Business and Human Rights](#), the ten principles of the [UNGC](#), the [ILO Declaration on Fundamental Principles and Rights at Work](#), and the [RBA Code of Conduct](#), this policy outlines actions to ensure that we are not engaged or complicit in human rights violations.

2. DEFINITIONS AND TERMS

Conflict Minerals – Certain minerals, including columbite-tantalite, also known as coltan; cassiterite (tin); gold; wolframite (tungsten); or their derivatives; or any other mineral or its derivatives determined to be financing armed conflict.

CSR – Corporate Social Responsibility

ILO – International Labor Organization

OECD – Organization for Economic Cooperation and Development

RBA – Responsible Business Alliance (formerly EICC)

Supply Chain - Upstream and downstream providers of services and products, spanning the entire product or service lifecycle.

UN – United Nations

UNGC – UN Global Compact. A voluntary initiative based on CEO commitments to implement universal sustainability [principles](#). Ingram Micro is a UNGC signatory member.

3. APPLICABILITY

This policy is applicable to all Ingram Micro entities, associates and business partners worldwide.

4. POLICY

We will not take part in human rights violations, and will not engage or be complicit in any activity that solicits or encourages human rights abuses. We're particularly committed to the elimination and prevention of the most egregious human rights violations occurring in our industry, including child labor, forced labor and human trafficking. We accomplish this by actively pursuing company-wide conformance to international human rights standards, including the Code of Conduct of the Responsible Business Alliance as outlined herein, and by implementing recommended due diligence processes. This policy is designed to comply with, and support compliance with, the California Transparency in Supply Chains Act, the UK Modern Slavery Act, the Australian Modern Slavery Act, the requirements of Federal Acquisition Regulations 52.222-50 and 52.222-56 and the E.U. Non-Financial Reporting Directive.

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A. LABOR

As a supporter of the RBA Code of Conduct, we are committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker.

1. **Freely Chosen Employment**

Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons shall not be used. This includes transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services.

There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company-provided facilities. As part of the hiring process, each worker must be provided with written employment terms in a language s/he understands prior to the worker departing from his or her country of origin and there shall be no substitution or change(s) allowed in the employment agreement upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms. All work must be voluntary and workers shall be free to leave work at any time or terminate their employment. Employers and agents may not hold or otherwise destroy, conceal, confiscate or deny access by employees to their identity or immigration documents, such as government-issued identification, passports or work permits, unless such holdings are required by law. Workers shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker. Recruiters must be trained, comply with local labor laws of the country in which the recruiting takes place and shall not use fraudulent or misleading recruiting practices.

2. **Young Workers**

Child labor is not to be used. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. Participant shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable law and regulations. Appropriate support and training shall be provided to all student workers. In the absence of local law, the wage rate for student workers, interns and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks.

3. **Working Hours**

Studies of business practices clearly link worker strain to reduced productivity, increased turnover and increased injury and illness. Working hours are not to exceed the maximum set by local law. Further, a

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workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days.

4. **Wages and Benefits**

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor will be within the limits of the local law.

5. **Humane Treatment**

There is to be no harsh and inhumane treatment including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

6. **Non-Discrimination**

We are committed to a workforce free of harassment and unlawful discrimination. Ingram Micro associates and business partners shall not engage in discrimination based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, social origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Workers shall be provided with reasonable accommodation for religious practices. In addition, workers or potential workers should not be subjected to medical tests or physical exams that could be used in a discriminatory way.

7. **Freedom of Association**

In conformance with local law, we respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.

B. HEALTH & SAFETY

We recognize that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. We also recognize that ongoing worker input and training is essential to identifying and solving health and safety issues in the workplace.

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1. **Occupational Safety**

Worker exposure to potential safety hazards (e.g., electrical and other energy sources, fire, vehicles, and fall hazards) are to be controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout), and ongoing safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment and educational materials about risks to them associated with these hazards. Reasonable steps must also be taken to remove pregnant women/nursing mothers from working condition with high hazards, remove or reduce any workplace health and safety risks to pregnant women and nursing mothers including those associated with their work assignments, as well as include reasonable accommodations for nursing mothers.

2. **Emergency Preparedness**

Potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including: emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment and property.

3. **Occupational Injury and Illness**

Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness including provisions to: encourage worker reporting; classify and record injury and illness cases; provide necessary medical treatment; investigate cases and implement corrective actions to eliminate their causes; and facilitate return of workers to work.

4. **Industrial Hygiene**

Worker exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled according to the hierarchy of controls. Potential hazards are to be eliminated or controlled through proper design, engineering and administrative controls. When hazards cannot be adequately controlled by such means, workers are to be provided with and use appropriate, well-maintained, personal protective equipment. Protective programs shall include educational materials about the risks associated with these hazards.

5. **Physically Demanding Work**

Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks is to be identified, evaluated and controlled.

6. **Machine Safeguarding**

Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.

7. Sanitation, Food, and Housing

Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Employer or labor agent-provided worker dormitories are to be maintained clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting, heat and ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.

8. Health and Safety Communication

Workers shall be provided with appropriate workplace health and safety information and training in a language they understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Training is provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise safety concerns.

C. ENVIRONMENTAL

We recognize that environmental issues are closely related to human rights and social justice. We therefore require that Ingram Micro entities adhere to our [Environmental Stewardship Policy](#). We encourage suppliers to adopt various strategies outlined in this policy, but require, at minimum, the following:

- Legal compliance at the local, regional, national and international level,
- Minimize environmental impact directly in operations and indirectly within the supplier's sphere of influence, including responsible use of natural resources and focus on pollution prevention,
- Establish an effective management system with focus on measurable performance improvements.

D. ETHICS

Integrity is a core value at Ingram Micro and we seek to engage with supply chain partners who share this value. Our [Code of Conduct](#) and [Anti-Bribery Policy](#) outline, in detail, our policies on business integrity, privacy, intellectual property, anti-bribery and other issues related to business ethics.

Furthermore, the mining of conflict minerals significantly impacts human rights. Ingram Micro requires that products we purchase are free from materials used to finance armed conflicts, including but not limited to gold, tantalum, tin, and tungsten. We fully comply with conflict minerals regulations to which we are subject in all countries of operation, and we expect the same from our suppliers. We ask our suppliers to exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available upon request. We recommend the use of credible frameworks, such as the [OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#), the [OECD Guidelines for Multinational Enterprises](#) and the [United Nations Guiding Principles on Business and Human Rights](#).

4. RESPONSIBILITIES

1. It is the responsibility of every associate to comply with this policy and associated laws in their countries of operation, and to seek guidance from their managers, the senior CSR manager, human resources or the legal department as needed.
2. Regional business unit leaders along with the local Human Resources and Compliance staffs are responsible for adherence to this policy in facilities they oversee.
3. Associates who report human rights violations or who voice concerns about suspected violations will not be retaliated against under any circumstances. Ingram Micro is committed to supporting and protecting human rights defenders.
4. Training items in support of this policy must be completed by assigned deadlines.
5. The Sr. Manager, CSR is responsible for the implementation of a management system as outlined in the RBA Code of Conduct, for the periodic review of this policy and its effectiveness, and for proposing relevant changes.
6. Ingram Micro stakeholders are encouraged to provide recommendations for the improvement of our Global Human Rights Policy.
7. Ingram Micro suppliers are required to adhere to the standards outlined in this policy.

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.

5. PROCEDURES

1. 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 and/or the Sr. Manager, CSR directly. Finally, anyone may report human rights violations to the Global Human Trafficking Hotline at 1-844-888-FREE and its email address at help@befree.org.
2. Employee reports of human rights violations or suspected violations must be investigated as soon as possible, including notification of authorities where necessary.
3. Appropriate corrective actions must be implemented for each incident in order to prevent recurrence.
4. All human rights violations and actions for resolution and prevention are regularly reported to executive leadership.

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6. 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.

7. EFFECTIVE DATE

January 1, 2017

8. APPROVALS

ON FILE