



# Forced Labour and Child Labour in Supply Chains Report

January 1, 2023 – December 31, 2023





## **INTRODUCTION**

This report (“**Report**”) has been prepared in accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”) for Ingram Micro Inc. (an Ontario corporation), Ingram Micro Holdco Inc. (an Ontario corporation), Ingram Micro Logistics LP (an Ontario limited partnership) and Ingram Micro LP (an Ontario limited partnership) (collectively, “**Ingram**”).

The Report is submitted and published for the financial year commencing January 1, 2023 and ending December 31, 2023 (the “**Reporting Period**”).

The Report outlines the steps taken by Ingram during the Reporting Period to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by Ingram or of goods imported into Canada by Ingram, along with other relevant information required under section 11 of the Act.

## **STRUCTURE, ACTIVITIES AND SUPPLY CHAINS**

### **Structure & Activities**

Ingram Micro Inc. and Ingram Micro Holdco Inc. are incorporated under the Ontario *Business Corporations Act*. Ingram Micro Logistics LP and Ingram Micro LP are limited partnerships registered pursuant to Ontario’s *Limited Partnerships Act*. Ingram Micro Inc. is the sole limited partner of Ingram Micro Logistics LP and Ingram Micro LP. Ingram Micro Holdco Inc. is the sole general partner of Ingram Micro Logistics LP and Ingram Micro LP. Ingram Micro Inc., Ingram Micro Holdco Inc., Ingram Micro Logistics LP, and Ingram Micro LP are all indirectly wholly owned subsidiaries of Ingram Micro, Inc. (“**Ingram Group**”), a Delaware corporation. The Ingram Group is one of the world’s largest distributors of information technology products and services.

Ingram is a trade-only distributor of information technology products and services, operating through product divisions that cater to different sectors of the market. Its core distribution business involves the purchase of products manufactured by others and the sale of those products to its wide range of customers, including brick and mortar retailers, online retailers, and corporate resellers. Ingram’s operations do not involve manufacturing or contracting to manufacture any information technology products or other goods.

Ingram operates across Canada, with offices in Mississauga, Ontario, Ville St-Laurent, Quebec, and Richmond, British Columbia, and warehouses in Mississauga, Ontario and Richmond, British Columbia.

### **Supply Chains**

Ingram’s supply chain includes hardware and software technologies procured for distribution and resale, and goods and services required to support its sales, marketing, promotions, and



day-to-day operational needs. The majority of Ingram's vendors and product offerings are listed on its [website](#), which is updated from time to time. With respect to its day-to-day operational needs, Ingram's suppliers include those involved in providing administrative and legal services, utilities, real estate leasing, and office supplies. Ingram's suppliers are comprised of multinational companies, as well as smaller companies from across the world.

Ingram Group recognizes that its supply chain includes partners who operate in countries and industries that are considered to be at higher environmental and socioeconomic risk. These supply chain partners include manufacturers, temporary employment agencies, freight services, facility services, construction companies, financial institutions, waste management companies and recyclers, and janitorial services.

### **POLICIES AND DUE DILIGENCE PROCESSES IN RELATION TO FORCED LABOUR AND CHILD LABOUR**

At Ingram Group, respect, equality, diversity, safety, and human kindness are essential principles – and Ingram Group supports the protection of human rights globally, directly within operations it controls and indirectly throughout its supply chain. In alignment with the United Nations Universal Declaration of Human Rights, the Ten Principles of the United Nations Global Compact, the International Labour Organization Declaration on Fundamental Principles and Rights at Work, and the Responsible Business Alliance Code of Conduct, Ingram Group's Global Human Rights Policy is designed to help it protect the human rights of every associate, regardless of location, as well as stakeholders throughout its supply chain.

Ingram complies with the following corporate practices of Ingram Group, which work together to manage the risk of forced and child labour within our own organization and our supply chain:

**The Code of Conduct** is the cornerstone of our compliance program. The Code of Conduct reflects Ingram's commitment to conducting business in alignment with the company's Tenets of Success (results, integrity, imagination, talent, responsibility, and courage). The goal of the Code of Conduct and related policies is to provide ethical guidance to Ingram's (and Ingram Group's) associates as to how they are expected to behave in the course of their duties.

**The Supplier Code of Ethics** articulates that Ingram (and Ingram Group) will only do business with suppliers, contractors, and consultants who comply with applicable laws and commit to our standards of business conduct set out in the Suppliers Code of Ethics. Ingram expects that the employees, sub-contractors, or any other parties of suppliers, who participate in Ingram work comply with applicable laws and commit to the standards set out in the Supplier Code of Ethics. The Supplier Code of Ethics expressly prohibits the use of forced labour and child labour and states that there shall be no unreasonable restrictions placed on workers' freedom of movement within work facilities or company-provided facilities, such as living quarters. It also requires that during the hiring process, all workers be provided with a written employment



agreement in their native language and that such agreement contains all terms and conditions of employment.

[The Global Human Rights Policy](#) is designed to support compliance with applicable laws and regulations that protect human rights. The Global Human Rights Policy sets out Ingram's commitment to not using forced labour or child labour. Ingram expects that all of its (and Ingram Group's) entities, associates, and business partners throughout its supply chain comply with this policy.

Ingram Group also reports publicly on its efforts to implement these policies through its annual [Environmental, Social and Governance \("ESG"\) report](#).

[Ingram Group's Hotline](#) is public and is accessible to all associates and third parties. The Hotline is operated by an independent third party. The purpose of the Hotline is to encourage and foster a culture of reporting any known or suspected breaches of the Code of Conduct or participation in any other illegal or unethical business practices. Associates who report suspected or known violations will not be retaliated against per the [Non-Retaliation Policy](#).

## **FORCED LABOUR AND CHILD LABOUR SUPPLY CHAIN RISKS AND STEPS TAKEN TO ADDRESS THESE RISKS**

Ingram has identified the following key risks within its supply chain:

**Sector and industry risks:** electronics have been identified as an at-risk industry for forced or child labour.

**Product and services risks:** certain products and services may have a higher risk of forced labour or child labour because of the way they are produced, provided, or used. Electronic goods which include laptops, computers, and mobile phones have been identified as products presenting risk of being implicated in forced labour or child labour.

**Geographic risks:** some countries may have higher risk of forced labour or child labour. Electronic goods, which include laptops, computers, and mobile phones, are often sourced from regions considered to have a risk of being implicated in forced labour or child labour.

In response to these risks, in addition to the policies and due diligence measures outlined above, through a recent evaluation by Ingram Group of its trade vendors, Ingram Group identified that a significant majority of its generated revenue is derived from vendors who are large global companies with mature Corporate Social Responsibility and ESG programs. Although Ingram Group's intended efforts to formally assess vendors are still in development, it believes that by doing business with these vendors, Ingram Group demonstrates shared commitment and compliance towards managing its social and environmental impacts. Global information



technology (“IT”) supply chains are complicated, and the IT channel is vast. For this reason, Ingram Group works on the trade side with its business partners to elevate performance across the IT channel to address a variety of ESG issues. These include Ingram Group’s participation in various partner programs. For example, in 2022, Ingram Group joined Dell Technologies Executive Partner Council on ESG topics. Ingram Group continues to monitor vendors and their commitments to global standards and reporting frameworks, such as the Responsible Business Alliance, Science Based Targets initiative, and CDP (formerly the Carbon Disclosure Project). In addition, as a signatory to the United Nations (UN) Global Compact, Ingram acknowledges its continued support for the Ten Principles on human rights, labor, environment, and anti-corruption. Ingram Group is also a member of Lenovo's 360 Circle initiative to address ESG issues in the channel.

### **REMEDIATION MEASURES**

No forced labour or child labour related risks were identified in the Reporting Period. Therefore, no measures have been taken to remediate forced labour or child labour in Ingram’s supply chains or operations.

### **REMEDIATION OF LOSS OF INCOME**

Ingram has not been made aware of any instances of forced labour or child labour in its operations or supply chains in the Reporting Period. Therefore, no measures have been taken to remediate the loss of income as a result of measures taken to eliminate the use of forced labour or child labour in Ingram’s operations or supply chains.

### **TRAINING**

Ingram provides ethics and compliance training to all of its associates upon joining the company.

Associates are also required to complete Ingram’s Global Code of Conduct training at regular intervals.

### **ASSESSING EFFECTIVENESS**

To ensure that forced labour and child labour are not used in its supply chains or business activities, Ingram Group implements its Ethical Compliance Program which monitors the efficiency and effectiveness of its risk mitigation efforts and provides guidance and assistance when operational issues are discovered.

As noted above, Ingram Group is in the process of determining what meaningful and impactful actions it should take to drive incremental improvements across its supply chains.



**APPROVAL AND ATTESTATION OF REPORT**

Pursuant to section 11 4(b)(ii) of the Act, this report has been approved by Ingram Micro Inc. (an Ontario corporation).

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for Ingram Micro Inc. (an Ontario corporation), Ingram Micro Holdco Inc. (an Ontario corporation), Ingram Micro Logistics LP (an Ontario limited partnership) and Ingram Micro LP (an Ontario limited partnership). Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

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**Brent Clooney**

**Director, Ingram Micro Inc. (an Ontario corporation)**

