



Forced Labour and Child Labour in Supply Chains Report

January 1, 2024 – December 31, 2024





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, 2024 and ending December 31, 2024 (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 Holding Corporation (“**Ingram Group**”), a Delaware corporation. The Ingram Group is a distributor 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 purchasing and importing products manufactured by others and selling 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 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

Ingram is subject to 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 Code of Conduct is offered in 19 languages.

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 acknowledges its continued support for the Ten Principles of the United Nations ("UN") Global Compact on human rights, labor,



environment, and anti-corruption and was a signatory to the UN Global Compact during the Reporting Period and 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, Ingram Group undertook an evaluation in 2023 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.

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).

Ingram Group’s intended efforts to formally assess vendors are still in development. Global information technology (“IT”) supply chains are complicated, and the IT channel is vast. For this reason, Ingram Group continues to work on the trade side with its business partners to elevate performance across the IT channel to address a variety of areas.

REMEDATION MEASURES

No instances of forced labour or child labour 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.





REMEDICATION 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. All employees are also required to complete Ingram Group's Code of Conduct training at regular intervals.

ASSESSING EFFECTIVENESS

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 the Board of Directors of Ingram Micro Inc. (an Ontario corporation) and Ingram Micro Holdco Inc.

In accordance with the requirements of the Act, and in particular section 11 thereof, I, in the capacity of Director of Ingram Micro Inc. (an Ontario corporation) and Ingram Micro Holdco Inc. attest that I have reviewed the information contained in the report for , (an Ontario corporation), Logistics LP (an Ontario limited partnership) LP (an Ontario limited partnership) on behalf of the governing body of the entities listed above. 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 Period listed above within this report.

DocuSigned by:

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Brent Clooney

Director, Ingram Micro Inc. (an Ontario corporation) and Ingram Micro Holdco Inc.

Date: 2025-May-20

I have authority to bind Ingram Micro Inc. and Ingram Micro Holdco Inc.

