

Code of Conduct Supplement for Germany

I. Scope of Application

Effective 1 January 2024, this Code of Conduct Supplement for Germany shall supplement Ingram Micro's global [Code of Conduct](#) insofar as it relates to Ingram Micro Distribution GmbH ("**Ingram Micro Germany**") in connection with the specific requirements of the German Supply Chain Due Diligence Act ("**SCDDA**").

This Code of Conduct Supplement for Germany applies to all employees of Ingram Micro Germany. These include full-time and part-time employees, senior employees, employees in probationary period, homeworkers, dependent sales representatives, employees on short-time work, employees absent due to maternity leave and temporary workers as well as Ingram Micro Germany's senior management.

Ingram Micro Germany is fully committed to Ingram Micro's global Code of Conduct and the principles described therein. Nothing in this Code of Conduct Amendment for Germany is meant to contradict or supersede Ingram Micro's global Code of Conduct in its then current version.

II. Message from the Management Board of Ingram Micro Germany

Ingram Micro Germany recognizes the vital role businesses play in safeguarding human rights and preserving the environment throughout its operations. Ingram Micro Germany is committed to promoting and advancing human rights, aiming to enhance the lives of individuals and achieve meaningful progress. This commitment extends to fostering sustainable practices, minimizing ecological footprints, and actively contributing to the well-being of our planet.

Against this background, Ingram Micro Germany takes the requirements of human rights and environment related due diligence as set out in the SCDDA (which will be applicable on Ingram Micro Germany from 1 January 2024) very seriously. You are required to act in accordance with these requirements.

This Code of Conduct Amendment for Germany shall inform you about the specific requirements. Please also familiarize Ingram Micro's global Code of Conduct (as amended).

In case of questions or uncertainties in the day-to-day business, please contact the Product Compliance Department at SupplyChainAct-Germany@ingrammicro.com. We at Ingram Micro Germany will solve any problem in a collaborative way.

In line with Ingram Micro's "Sunshine Rule", we believe in the principle of bringing issues forward to correct them. Management strongly encourages you to report any (potential) violations of this Code of Conduct Supplement for Germany, Ingram Micro's global [Code](#)

[of Conduct](#) or any applicable laws and regulations via Ingram Micro Germany's reporting channels (please refer to Ingram Micro [Code of Conduct](#), Ingram Micro Non-Retaliation Policy and Ingram Micro Hotline for additional information). Ingram Micro's policy protects individuals who report a violation in good faith from any retaliation.

III. Human rights- and environment-related supply chain due diligence

The SCDDA contains certain due diligence requirements along the supply chain. Ingram Micro Germany must make serious efforts to fulfil the due diligence obligations concerning the own business area, i direct suppliers and indirect suppliers.

In particular, Ingram Micro Germany is required to **(i)** implement risk management, **(ii)** conduct risk assessment, **(iii)** implement preventive measures and remedial actions, **(iv)** implement grievance mechanism and **(v)** fulfil documentation and reporting requirements. In order to comply with these requirements, Ingram Micro Germany has implemented corresponding organizational steps. Please refer to our Policy Statement on the Human Rights Strategy and/or the responsible function for more information.

Ingram Micro Germany has developed several additional principles described below to comply with these requirements. It is vital for Ingram Micro Germany that you as an employee support these efforts and take these principles to heart vis-à-vis your colleagues and Ingram Micro Germany's direct and indirect suppliers:

a) Freely Chosen Employment

Ingram Micro Germany is convinced that employees perform best if they are satisfied with what they do. This is why Ingram Micro Germany condemns all types of forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery, practices akin to slavery, serfdom or other forms of domination or oppression on the workplace including extreme economic or sexual exploitation or trafficking of persons (cf. ILO Conventions No. 29 and 105 and the International Covenant of 19 December 1966 on Civil and Political Rights).

Ingram Micro Germany ensures, that all work is voluntary, and workers are free to leave work at any time or terminate their employment without penalty if reasonable notice is given as per worker's contract.

b) No Child Labor

Ingram Micro Germany engages in the protection of children's development, their childhood, dignity, health, and safety. Ingram Micro Germany has a zero-tolerance policy when it comes to child labor.

Child labor is not to be used in any stage of manufacturing. "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. Ingram Micro Germany will ensure the protection of children by appropriate means and will comply in particular with ILO Conventions No. 138 on the Minimum Age for Employment and No. 182 on the Prohibition of the Worst Forms of Child Labor. Accordingly, workers under the age of 18 shall not perform work that is likely to jeopardize their health or safety or morals.

Other worst forms of child labour for young workers as defined in Article 3 of Convention No. 182 of the International Labour Organization of 17 June 1999 are equally forbidden.

c) Fair Working Conditions

Ingram Micro Germany strives to establish fair working conditions and takes internationally recognized standards of the International Labor Organization (ILO) appropriately into account. In particular, this includes an adequate compensation paid to employees, that shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits to grant an adequate living wage. Deductions from wages as a disciplinary measure shall not be permitted.

Ingram Micro Germany recognizes the great importance of a healthy and safe workplace to minimize risks of accidents and work-related hazards in accordance with applicable occupational safety and health obligations under the law of the place of employment. Hence, Ingram Micro Germany complies with local laws on breaks, rest periods and time off. Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 48 hours per week, including overtime (except in emergency or unusual situations). All overtime must be voluntary and is only arranged to the extent permitted by the law.

d) Non-Discrimination/Non-Harassment

Ingram Micro Germany is committed to inclusion and diversity and is committed to protect the rights of vulnerable groups and to foster a workplace free of harassment and unlawful discrimination.

Ingram Micro Germany and its employees shall not engage in discrimination or harassment based on race, colour, age, gender, sexual orientation, gender identity and expression, ethnicity or social or national origin, disability, pregnancy, religion, political affiliation or political opinion, union membership, covered veteran or health status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training, unless this is justified by the requirements of the employment.

e) Freedom of Association

Ingram Micro Germany appreciates the cooperation with trade unions for the mutual benefit of both employers and employees and respects the right of all employees to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly, as well as the right to refrain from such activities. Trade unions are free to operate in accordance with applicable law of the place of employment, which includes the right to strike. Ingram Micro Germany ensures that employees or their representatives are able to openly communicate and share ideas and concerns with the management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment. Ingram Micro Germany refrains from unjustified discrimination and retaliation based on the formation, joining or membership of a trade union.

f) Health and Safety at Work

Providing a healthy and safe workplace is crucial to Ingram Micro Germany to minimize the incidence of work-related injury and illness as well as risks of work-related hazards in

accordance with applicable occupational safety and health obligations under the law of the place of employment. Ingram Micro Germany has implemented adequate safety and health management systems and controls in accordance with applicable laws and business standards to prevent accidents and illnesses in the best possible way.

This includes the identification, assessment and mitigation of worker potential for exposure to health and safety hazards. Where hazards cannot be adequately controlled, workers are to be provided with appropriate equipment and educational materials about risks to them associated with these hazards. Further, potential emergency situations are to be identified, assessed and their impact minimized by the implementation of emergency plans and response procedures. Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness. Moreover, employees are to be provided with appropriate workplace health and safety information and training in a language they can understand for all identified workplace hazards that workers are exposed to.

g) No harmful environmental impacts

Ingram Micro Germany is committed to the protection of the environment and the continuous optimization of a sustainable development for the benefit of present and future generations.

Ingram Micro Germany refrains from causing any harmful soil change, water pollution, air pollution, harmful emission or excessive water consumption that significantly impairs the natural bases for the preservation and production of food, denies a person access to safe and clean drinking water, makes it difficult for a person to access sanitary facilities or harms the health of a person.

Therefore, emissions and discharges of pollutants and generation of waste are to be minimized or eliminated at the source. The use of natural resources, including water, fossil fuels, minerals, and virgin forest products, is to be conserved by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, or other means. Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, and combustion byproducts generated from operations are to be characterized, routinely monitored, controlled, and treated as required prior to discharge.

h) No unlawful eviction and taking of land

Ingram Micro Germany recognizes the importance of conducting business operations in harmony with local communities and respecting evolved structures within the applicable legal framework. This includes respecting the local livelihood. Hence, Ingram Micro Germany does not complicit in any unlawful eviction or taking of land, forests and waters in the acquisition, development or other use of land, forests and waters, the use of which secures the livelihood of a person.

i) Security Personnel

Ingram Micro Germany ensures that the hiring or use of public or private security personnel does not occur without appropriate supervision and training to avoid any form of torture, cruel, inhumane, or degrading treatment, risks for life and limb or impairments of the freedom of association.

j) Environmental Protection

Ingram Micro Germany recognizes that environmental responsibility is integral to distributing world class products and services. In procurement and distribution operations, environmental impacts are to be identified and adverse effects on the community, environment and natural resources are to be minimized, while safeguarding the health and safety of the public. Ingram Micro Germany strives to reduce any burdens on the environment related to its business activities. This applies in particular compliance with the (i) use of mercury, (ii) persistent organic pollutants, and (iii) the handling, storing and transport of hazardous waste, as far as applicable to Ingram Micro Germany's business operations.

Ingram Micro Germany especially recognizes and embraces the significance of the following conventions:

- The Minamata Convention on Mercury adopted in 2013,
- The Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal adopted in 1989, and
- The Stockholm Convention on Persistent Organic Pollutants (POPs Convention) adopted in 2001.