INGRAM MICRO INC (GROUP)
United States of America | Wholesale of computers, computer peripheral equipment and software

105.10/200
EICC VAP

Strengths and Improvement Areas

Environment

Start improving
**Strengths (30)**

### Policies

- Quantitative objectives set on some relevant issues [i.e. energy consumption & GHGs]
- Comprehensive policy on a majority of environmental issues
- Endorsement of external initiative on environmental issues [SmartWay Transport Partners (program of the US EPA)]
- Endorsement of the United Nations Global Compact (UNGC)

### Actions

- Information provided to customers on product’s environmental impacts (e.g. carbon footprint)
- Reduction of GHG emissions through technology or equipment upgrades
- Reduction of energy consumption through technology or equipment upgrades
- Systematic optimization of truck loads
- Use of IT tools to optimize route planning
- Purchasing of renewable energy
- Provides an alternative free take-back service for WEEE [recycling services provided]
- Products designed for easy dismantling and easy recyclability
- Provision of information or services to customers to facilitate management of waste
- Measures to reduce energy consumption
- Measures to reduce paper consumption
- Provision of products with an eco-label
- Measures implemented to use recycled packaging
- Regular training on work processes for labeling, storing, handling and transporting hazardous goods
- Company takeback programs
- ISO 14001 certified (at least one operational site)
- Company recycling infrastructure or formal partnership established

### Results

- Reporting on total weight of non-hazardous waste
- Reporting on total weight of hazardous waste
- Reporting on total gross Scope 1 and 2 GHG emissions
- Materiality analysis in sustainability reporting
- Company communicates progress towards the Sustainable Development Goals (SDGs)
- Company reports to CDP
- Reporting on total energy consumption
- Comprehensive reporting on environmental issues
## Improvement Areas (3)

<table>
<thead>
<tr>
<th>Priority</th>
<th>Improvement Areas</th>
</tr>
</thead>
<tbody>
<tr>
<td>Low</td>
<td>Less than 20% of operational sites ISO 14001 certified</td>
</tr>
</tbody>
</table>

## Results

<table>
<thead>
<tr>
<th>Priority</th>
<th>Improvement Areas</th>
</tr>
</thead>
<tbody>
<tr>
<td>Low</td>
<td>No external assurance of sustainability reporting</td>
</tr>
<tr>
<td>Low</td>
<td>Declares reporting on WEEE but no supporting documentation</td>
</tr>
</tbody>
</table>

## Labor & Human Rights

### Strengths (39)

#### Policies

Strengths

- Standard policy on a majority of labor or human rights issues
- Endorsement of the United Nations Global Compact (UNGC)

#### Actions

Strengths

- Measures to promote gender and/or minority inclusion in the workplace
- Collective agreement in place
- Formalized procedure related to career management & training
- Compensation for extra or atypical working hours
- Additional leave beyond standard vacation days
- Remuneration process (e.g. salary grid, procedure for salary advancement) communicated to employees
- Employee satisfaction survey
- Health care coverage of employees in place
- Whistleblower procedure on discrimination and harassment
- Awareness training regarding diversity, discrimination, and/or harassment
- Training on health and safety issues for subcontractors working on the company premises
- Active measures for the prevention of musculoskeletal disorders
- Emergency preparedness plan to all impacted employees (e.g. fire drills)
- Employee representatives or employee representative body (e.g. works council)
- Employee health & safety detailed risk assessment
- Measures to prevent discrimination during recruitment phase
Regular assessment (at least once a year) of individual performance
Mandatory health check-up for employees
Active preventive measures for noise exposure
Active preventive measures for stress
Active preventive measures for Repetitive Strain Injury (RSI)
Official measures promoting career mobility
Provision of skills development training
Measures to prevent on-site substance use
ISO 45001/OHSAS 18001 certified (at least one operational site)
Joint labor management health & safety committee in operation
Setting of individual career plan for all employees
European Works Council in place
Training of relevant employees on health & safety risks and best working practices

**Results**

**Strengths**

- Reporting on training hours per employee
- Reporting on the percentage of workers from minority groups and/or vulnerable workers in top executive positions
- Materiality analysis in sustainability reporting
- Company communicates progress towards the Sustainable Development Goals (SDGs)
- Reporting on the percentage of women in top executive positions
- Comprehensive reporting on labor and human rights issues
- Reporting on accident frequency rate
- CSR report follows GRI guidelines [In accordance - Core]

**Improvement Areas (4)**

**Policies**

<table>
<thead>
<tr>
<th>Priority</th>
<th>Improvement Areas</th>
</tr>
</thead>
<tbody>
<tr>
<td>Low</td>
<td>No quantitative target on labor and human rights issues</td>
</tr>
</tbody>
</table>

**Actions**

<table>
<thead>
<tr>
<th>Priority</th>
<th>Improvement Areas</th>
</tr>
</thead>
<tbody>
<tr>
<td>Low</td>
<td>Less than 20% of operational facilities ISO 45001/OHSAS 18001 certified</td>
</tr>
</tbody>
</table>

**Results**

<table>
<thead>
<tr>
<th>Priority</th>
<th>Improvement Areas</th>
</tr>
</thead>
<tbody>
<tr>
<td>Low</td>
<td>No external assurance of sustainability reporting</td>
</tr>
<tr>
<td>Low</td>
<td>No information on reporting on accident severity rate</td>
</tr>
</tbody>
</table>
Ethics

Strengths (21)

Policies

Strengths

Disciplinary sanctions to deal with policy violations

Exceptional policy on ethics issues

Dedicated responsibility for ethics issues

Endorsement of the United Nations Global Compact (UNGC)

Actions

Strengths

Incident response procedure (IRP) to manage breaches of confidential information

Whistleblower procedure to report ethics issues

Implementation of a records retention schedule

Periodic information security risk assessments performed

Audits of control procedures to prevent information security breaches

Provision of competitor interaction guidelines to key employees

Periodic corruption risk assessments performed

Supporting documentation demonstrates a high level of coverage of ethics actions throughout the company operations

Measures to protect third party data from unauthorized access or disclosure

Audits of control procedures to prevent corruption

Awareness training performed to prevent corruption

Specific approval procedure for sensitive transactions (e.g. gifts, travel)

ISO 27001 certified (certification of information security management system)

Results

Strengths

Materiality analysis in sustainability reporting

Company communicates progress towards the Sustainable Development Goals (SDGs)

Comprehensive reporting on ethics issues

CSR report follows GRI guidelines [In accordance - Core]

Improvement Areas (4)

Actions

Priority

Improvement Areas

High

No supporting documentation regarding third party due diligence on ethics issues
### Results

<table>
<thead>
<tr>
<th>Priority</th>
<th>Improvement Areas</th>
</tr>
</thead>
<tbody>
<tr>
<td>Medium</td>
<td>No supporting documentation regarding awareness trainings on information security</td>
</tr>
<tr>
<td>Low</td>
<td>No external assurance of sustainability reporting</td>
</tr>
</tbody>
</table>

### Sustainable Procurement

**Strengths (14)**

#### Policies

- Endorsement of the Responsible Minerals Initiative (RMI, formerly CFSI)
- Policy on conflict minerals issues
- Sustainable procurement policies on supplier environmental practices

#### Actions

- Supplier CSR code of conduct in place
- Grievance mechanism allowing any interested parties to voice and record concerns on conflict minerals
- Selected suppliers required to fill Conflict Minerals Reporting Template (CMRT)/other customized conflict mineral-related questionnaire
- On-site audits of suppliers on environmental or social issues
- Regular supplier assessment (e.g. questionnaire) on environmental or social practices
- Training of buyers on social and environmental issues within the supply chain
- Integration of social or environmental clauses into supplier contracts
- CSR risk analysis (i.e. prior to supplier assessments or audits)

#### Results

- Reporting on Scope 3 emissions
- Materiality analysis in sustainability reporting
- Company communicates progress towards the Sustainable Development Goals (SDGs)

### Improvement Areas (8)

#### Policies

<table>
<thead>
<tr>
<th>Priority</th>
<th>Improvement Areas</th>
</tr>
</thead>
<tbody>
<tr>
<td>Medium</td>
<td>Inconclusive documentation or only basic policy on supplier social practices</td>
</tr>
</tbody>
</table>

#### Actions
### 360° Watch Findings

**18 Mar 2020**

**Ingram Micro Denies That It Helped Fix Prices On Apple Products**

Ingram Micro has rejected allegations by an antitrust authority that it fixed Apple product prices in the French market, describing them as “absolutely false”. On Monday, March 16, the French competition watchdog – L’Autorité de la Concurrence – issued its largest ever fine, against Apple, Tech Data and Ingram Micro, amounting to €1.24bn in total. Ingram Micro’s fine was €62.9m.

No score impact

**24 Feb 2020**

**Ingram Micro is recognized as a ‘Great Place to Work’ in the Philippines**

Ingram Micro Philippines, the Global Business Services arm of Technology and Supply Chain giant Ingram Micro Inc., has received its first Great Place to Work certification from Great Place to Work Institute – joining an elite group of companies around the globe to be recognized for high-performance workplace culture.

No score impact

**25 Sep 2019**

**Ingram Micro Partners with BAN to Have e-Stewards Certification for All Facilities**

rvine, California-based Ingram Micro – a leading IT asset disposition services provider has committed to achieve e-Stewards certification standard for all its worldwide facilities within three years. The announcement to this effect was made jointly by the company and the Basel Action Network (BAN). Upon achieving the milestone, Ingram will emerge as the first e-Stewards certified ITAD service provider having operations spanning five continents.

No score impact

### Specific Comments

- Company (or one of its subsidiaries) does not have significant relationships with at least one politically exposed person (PEP).
- Company (or one of its subsidiaries) is included on a major sanctions list/watchlist.
- The implementation coverage of CSR measures and actions throughout the company is unclear.
- An audit report was provided, but did not meet eligibility requirements (e.g. out of scope, outdated, questionable auditing body accreditation, formalization).
- Some supporting documents were considered too outdated to be included in this assessment.