Environmental Stewardship Policy

Corporate Social Responsibility

1. PURPOSE

This policy outlines sustainable business strategies and practices in support of Ingram Micro's global environmental stewardship efforts.

2. DEFINITIONS

Business Unit – Any integrated site over which Ingram Micro has financial or operational control.
CDP – Formerly Carbon Disclosure Project. A UK-based non-profit organization operating a global disclosure system for the collection of environmental data of companies, cities, states and regions.
CSR - Corporate Social Responsibility
Energy Star – An energy efficiency program administered by the U.S. EPA, offering certification for electric and electronic products, as well as energy efficiency ratings and certification for buildings.
EPA SmartWay – A voluntary fleet efficiency program administered by the U.S. EPA.
EPEAT – Electronic Product Environmental Assessment Tool. Environmental rating system for electronic products administered by the Green Electronics Council.
e-Stewards - An electronics waste recycling standard created by the Basel Action Network.
ISO 14001 – Framework that defines the criteria for a certifiable environmental management system.
Precautionary principle – When an activity raises threats of harm to human health or the environment, precautionary measures should be taken even if some cause-and-effect relationships are not fully established scientifically.
R2 - The Responsible Recycling Practices Standard (R2:2013) certification is a set of voluntary principles and guidelines designed to promote and assess responsible practices for electronics recyclers.
Stakeholder – Interested party. Stakeholders include, among others, customers, business partners, employees, company executives, regulators, communities, media, investors, non-governmental organizations, academics and product end-users.

3. SCOPE / APPLICABILITY

This policy is applicable to all Ingram Micro business units and entities worldwide.

4. POLICY STATEMENT

Ingram Micro recognizes the impact of its global operations on ecological systems and is committed to environmental stewardship at the highest organizational level. We acknowledge and aim to meet the expectations of our diverse stakeholders through engagement and collaboration. Our commitment encompasses

- legal compliance at the local, regional, national and international level,
- minimizing our environmental impact directly where we have control and indirectly where we have influence,
- responsible use of natural resources, and focus on pollution prevention and climate action,
- continuous improvement in environmental performance across global operations,
- periodically reporting progress against measurable targets that consider planetary boundaries, employing globally recognized reporting standards and protocols,

INGRAM MICRO

Environmental Stewardship Policy	Doc Ref: V. 3 Date created: Nov. 6, 2015 Contact: CSR Manager Dept.: Global Engineering Page: 2 of 6

Corporate Social Responsibility

- comprehensive stakeholder engagement, and
- seeking innovative approaches to advance environmental stewardship globally.

We implement this policy through the strategies outlined in this document.

5.   STRATEGIES

Commitment to environmental compliance is the basic prerequisite for our environmental stewardship program. All employees must always observe Ingram Micro's values and all laws and regulations. We expect our supply chain partners globally to abide by these same values and standards. The following eight strategies comprise the focus areas of our environmental stewardship efforts. Facilities may select any number of activities, as deemed practical, to achieve our policy objectives.

1.   ENVIRONMENTAL MANAGEMENT SYSTEMS

Each Ingram Micro facility, unless exempt, shall develop an environmental management system (EMS), substantially in alignment with relevant sections of the ISO 14001 or EMAS standard; pursue EMS certification according to business need, where feasible; and support environmental performance management efforts at the corporate level.

Exempt facilities include:

- Administrative offices below 10,000 ft2 (930 m2) with no significant environmental impacts or where environmental impact measurement is not feasible
- Storage facilities where environmental impact has been deemed insignificant
- Parking lots
- Facilities to be deactivated within 12 months
- Facilities over which Ingram Micro has no operational control

2.   BUILDING MANAGEMENT

Operation of buildings worldwide constitutes a significant portion of Ingram Micro's direct environmental impact. Accordingly, sites shall continuously evaluate opportunities for efficiency gains.

1. Efficient use of Resources

All global sites are encouraged to pursue resource conservation efforts, including the following:

- Minimizing water and energy use to the extent possible
- Monitoring metered energy and water use
- Optimizing material use, including corrugate, fill material, paper and supplies
- Managing equipment and furniture responsibly to maximize useful life
- Seeking opportunities to avoid and reduce waste generation
- Participating in available material recycling programs
- Raising awareness among colleagues and leading by example

INGRAM MICRO®

Environmental Stewardship Policy

Doc Ref: V. 3
Date created: Nov. 6, 2015
Contact: CSR Manager
Dept.: Global Engineering
Page: 3 of 6

Corporate Social Responsibility

2. Construction and Building Selection

Ingram Micro may be involved in construction decisions of new or existing buildings, but primarily leases its real estate portfolio. Therefore, activities that fall under the responsibility of the land owner (e.g. environmental impact assessments) are excluded from our strategies.

a. Prior to constructing or modifying buildings, consideration shall be given to the following:

- Alternatives to new construction, such as occupying existing buildings
- Sustainable building and interior space design strategies
- Use of sustainable building materials
- LEED or equivalent certification
- Renewable or low-emissions energy installations
- Proximity to protected or environmentally sensitive lands

b. The due diligence process for building selection shall include the following:

- Assessment of building efficiency and environmentally preferable features
- Green building certification status
- The ability to obtain resource consumption data at locations where Ingram Micro does not directly contract utility services

3. Process Design for Sustainability

Process design in Advanced Logistics Centers is an opportunity to integrate principles in support of environmental stewardship, including

- equipment efficiency,
- use of rechargeable batteries in industrial trucks,
- resource optimization and consideration of renewable energy,
- equipment preventive maintenance programs, and
- application of the precautionary principle.

3. TRANSPORTATION

1. Distribution Partners

Ingram Micro partners with third party freight transporters for the distribution of products. When choosing vendors, consider the following:

- Transporters participating in freight sustainability programs (e.g. EPA SmartWay in the U.S.)
- Transporters using low-emission fuels (e.g. LNG, electricity, hybrid)
- Transporters actively engaged in fleet efficiency efforts, such as route optimization, load optimization, light-weighting, aerodynamic fleet design, and anti-idling technologies
- Transporters with active environmental impact reduction targets

INGRAM MICRO

Environmental Stewardship Policy

Doc Ref: V. 3
Date created: Nov. 6, 2015
Contact: CSR Manager
Dept.: Global Engineering
Page: 4 of 6

Corporate Social Responsibility

2. **Business Travel**

Ingram Micro urges all employees to reduce business travel when possible by taking the following measures:

- Utilization of communications technologies in lieu of travel
- Combining visits to multiple locations to reduce total travel mileage
- Optimizing travel routes
- Employing efficient transportation modes (e.g. rail in place of air travel, where available)
- Carpooling at business events when feasible

3. **Employee Commuting**

Where lawful and practicable, Ingram Micro encourages use of alternative transportation and supports reduction in commuting to reduce environmental impact by offering the following, among others:

- Alternate workweek schedules
- Telecommuting options
- Rideshare programs
- Monetary incentives for use of public transportation, bicycling and carpooling

4. **PACKAGING**

Ingram Micro's primary packaging impact results from shipping materials. Such impact shall be reduced by aiming to

- reuse packaging materials when possible (e.g. pallets, edge protectors, corrugated cartons, void fill material),
- avoid mixed material packaging that cannot be efficiently separated in recycling facilities,
- recycle packaging materials that cannot be reused,
- maximize the use of materials with post-consumer recycled content and materials made from renewable resources,
- give preference to materials with recycled content certifications
- explore viable options for lower-impact void-fill materials, and
- adopt carton right-sizing technologies.

5. **SUPPLY CHAIN**

Ingram Micro's expansive upstream and downstream supply chain presents an opportunity to impact environmental performance where we have influence, rather than direct control. We strive to encourage environmentally responsible practices by

- communicating our policies and expectations to supply chain partners,
- assessing key supplier environmental performance
- favoring suppliers certified to globally recognized standards or adhering to globally recognized environmental management and reporting frameworks,

INGRAM MICRO®

Environmental Stewardship Policy

Doc Ref: V. 3
Date created: Nov. 6, 2015
Contact: CSR Manager
Dept.: Global Engineering
Page: 5 of 6

Corporate Social Responsibility

- favoring products with eco-labels, recycled content, and sustainable design features,
- purchasing equipment and systems designed to optimize use of natural resources, and
- purchasing environmentally preferable supplies.

6. IT EFFICIENCY

Ingram Micro is making focused efforts to reduce the impact of technology on the environment. IT efficiency efforts globally shall consider the following:

- Virtualization of IT infrastructure and adoption of cloud-based technologies
- Data center efficiency
- Power management
- Sourcing of hardware designed for disassembly and recyclability
- Preference for products with the EPEAT, Energy Star or equivalent label

7. ELECTRONIC WASTE MANAGEMENT

Ingram Micro has taken strategic steps to significantly reduce the environmental impact of products we distribute and will continue to support and improve these efforts through

- reverse logistics solutions, including take-back programs for electronic waste,
- repairing, repurposing and recycling used electronics,
- e-Stewards and R2 certification,
- compliance with all electronic waste collection, handling, storage, disposal and recordkeeping regulations,
- offering as-a-service, hosted infrastructure and cloud-based options as alternatives.

8. MEASURING & REPORTING

Ingram Micro recognizes that continuous improvement relies on performance measurement, development of meaningful targets and communication of results. We will strive to

- collect, at minimum, energy and water consumption data for all facilities, given the information is reasonably obtainable,
- develop a company-wide greenhouse gas emissions inventory according to a globally recognized protocol,
- periodically quantify global water consumption by region and identify water scarcity hotspots,
- develop context-based targets for emissions reduction,
- develop meaningful targets for water reduction in water-scarce communities, if water is deemed a material impact,
- identify operations in regions of high biodiversity value,
- annually report our greenhouse gas emissions inventory, including risks and opportunities from climate change,
- report overall environmental performance to our stakeholders in an annual CSR report, following a globally recognized reporting framework.

INGRAM MICRO

Environmental Stewardship Policy

Doc Ref: V. 3
Date created: Nov. 6, 2015
Contact: CSR Manager
Dept.: Global Engineering
Page: 6 of 6

Corporate Social Responsibility

6. RESPONSIBILITIES

a. The CSR Manager is responsible for periodic review of this policy and its continued relevancy.
b. Assigned approvers for this policy are responsible for timely review and approval.
c. All associates and business units are responsible for effectively implementing this policy as applicable to their facilities and roles.
d. All Ingram Micro stakeholders are encouraged to provide recommendations for the improvement of our environmental stewardship program.
e. Facilities globally must designate one or more associate(s) responsible for the tracking, auditing and reporting of environmental data.
f. Training items in support of this policy must be completed by assigned deadlines.

7. RELATED DOCUMENTS

- Ingram Micro's Supplier Code of Conduct

8. REVISION HISTORY

1. Revised March 6, 2012. Original policy published April 15, 2011. Nature of revision not noted.
2. Revised November 6, 2015 to broaden scope of sustainable business practices. Changed title from Environmental Compliance and Performance to Environmental Stewardship. Removed focus on compliance in favor of comprehensive, strategic initiatives. Updated responsibilities.
Srisu Subrahmanyam, VP Global Engineering, replaced by Alain Monié, CEO, as policy approver.
3. Anil Nair replaced as reviewer by Jeffrey Paul Langenfeld, SVP Global Operations and Engineering on March 25, 2019. Exemption added for EMS requirement. Exemption removed for utility data reporting. Simplification of language and clarification of strategies, as well as correction of typographical errors.
4. Periodic review completed on August 6, 2019, resulting in the following changes: (1) climate action and planetary boundaries added to policy statement; (2) introduction added to Section 5.2.2 and references to building acquisition replaced with building selection to better reflect our real estate model; (3) significant exemptions added to EMS requirement in section 5.1. (4) Precautionary principle added to Section 5.3 as a process design strategy. (5) Strategy introduction and section heads updated to reflect that not all activities are required at all locations. Other minor changes to add clarity, correct formatting and reflect current responsibilities. Effective date corrected from 2015 to 2016. First reviewer updated.

9. EFFECTIVE DATE

Date: January 15, 2016

10. APPROVALS

ON FILE