



We've prepared our 2018 CSR report with the digital reporting tool of the Global Reporting Initiative, because the format facilitates stakeholder analysis of specific indicators. However, the tool doesn't allow users to browse through the entire report. Therefore, we're making this alternative format available as well.

To view the report prepared with the GRI reporting tool, [click here](#).

To link directly to the GRI content index, [click here](#).

Contents

Organizational profile	4
Strategy	10
Ethics and integrity	11
Governance	12
Stakeholder engagement.....	13
Reporting practice.....	17
Economic Performance	18
GRI 103: Management Approach 2016.....	18
GRI 201: Economic Performance 2016.....	20
Anti-corruption.....	25
GRI 103: Management Approach 2016.....	25
GRI 205: Anti-corruption 2016	27
Anti-competitive Behavior.....	28
GRI 103: Management Approach 2016.....	28
GRI 206: Anti-competitive Behavior 2016	28
Materials	29
GRI 103: Management Approach 2016.....	29
GRI 301: Materials 2016	30
Energy.....	32
GRI 103: Management Approach 2016.....	32
GRI 302: Energy 2016	33
Water	35
GRI 103: Management Approach 2016.....	35
GRI 303: Water 2016.....	36
Emissions.....	37
GRI 103: Management Approach 2016.....	37
GRI 305: Emissions 2016	40
Effluents and Waste	48
GRI 103: Management Approach 2016.....	48
GRI 306: Effluents and Waste 2016.....	49
Environmental Compliance.....	51
GRI 103: Management Approach 2016.....	51

GRI 307: Environmental Compliance 2016.....	52
Supplier Environmental Assessment	52
GRI 103: Management Approach 2016.....	52
GRI 308: Supplier Environmental Assessment 2016.....	53
Employment	54
GRI 103: Management Approach 2016.....	54
GRI 401: Employment 2016.....	55
Occupational Health and Safety	58
GRI 103: Management Approach 2016.....	58
GRI 403: Occupational Health and Safety 2018.....	59
Training and Education	67
GRI 103: Management Approach 2016.....	67
GRI 404: Training and Education 2016.....	68
Diversity and Equal Opportunity	70
GRI 103: Management Approach 2016.....	70
GRI 405: Diversity and Equal Opportunity 2016.....	72
Child Labor.....	76
GRI 103: Management Approach 2016.....	76
GRI 408: Child Labor 2016	76
Forced or Compulsory Labor.....	78
GRI 103: Management Approach 2016.....	78
GRI 409: Forced or Compulsory Labor 2016	78
Supplier Social Assessment	79
GRI 103: Management Approach 2016.....	79
GRI 414: Supplier Social Assessment 2016.....	79
Customer Privacy.....	79
GRI 103: Management Approach 2016.....	79
GRI 418: Customer Privacy 2016	80
Socioeconomic Compliance	80
GRI 103: Management Approach 2016.....	80
GRI 419: Socioeconomic Compliance 2016.....	81
Sustainable Development Goals (SDG) Matrix.....	82

2018 CSR Report

Organization Name: Ingram Micro

Sector: Technology Hardware

GRI 102: General Disclosures

Organizational profile

102-1: Name of the organization

Ingram Micro, Inc.

102-2: Activities, brands, products, and services

Ingram Micro is a B2B provider of technology solutions, cloud services, software and IT product lifecycle services.

Within our Technology Solutions (TS) business, we offer distribution services, leading IT products, technical and sales support, marketing services, credit management and specialty services. Our TS unit comprised the majority of our 2018 revenue. Within the distribution product category, IT peripherals and systems comprise approximately 60-70 percent of revenue, while software, networking, and mobility products generate 30-40 percent of revenue.

Our Commerce and Lifecycle Solutions (CLS) business brings together forward and reverse logistics, fulfilment, and IT asset disposition to address the lifecycle of any IT asset. From initial delivery to return, refurbishment, remarketing and on to end-of-service or recycling, we optimize IT asset management for clients across industries and around the globe.

Our Cloud Services business offers more than 250 cloud marketplace solutions, a cloud referral program and the CloudBlue platform, which we introduced in 2018. The program enables companies to easily adapt to industry changes while monetizing any service in a subscription model, automating end-to-end operations and reducing time to market and revenue.

Under our V7 brand, we market private-label electronics and accessories on online platforms and in prominent retail outlets.

102-3: Location of headquarters

Ingram Micro's headquarters are in Irvine, California.

102-4: Location of operations

In 2018, we operated facilities in 58 countries. Locations annotated with an asterisk indicate more than 100 employees.

Argentina	Hong Kong*	Romania
Australia*	Hungary*	Russian Federation*
Austria*	India*	Saudi Arabia*
Bangladesh	Indonesia	Serbia
Belgium*	Israel	Singapore*
Brazil*	Italy*	Slovakia
Bulgaria*	Lebanon	Slovenia
Canada*	Malaysia*	South Africa
Chile*	Mexico*	Spain*
People's Republic of China*	Morocco	Sweden*
Colombia*	Netherlands*	Switzerland*
Costa Rica*	New Zealand*	Thailand*
Croatia	Norway	Turkey*
Czechia	Oman	United Arab Emirates*
Denmark	Pakistan	United Kingdom*
Ecuador	Peru*	United States*
Egypt	Philippines*	Uruguay
Finland	Poland*	Vietnam
France*	Portugal	
Germany*	Republic of North Macedonia	

We operate advanced logistics centers in the United States, Canada, Australia, Germany, the Netherlands, France and the United Kingdom. Our Global Business Services offices are in Bulgaria, Costa Rica and the Philippines. Our largest administrative offices operate in the United States (Irvine, Calif., and Williamsville, N.Y.) and in Germany (Dornach).

102-5: Ownership and legal form

Ingram Micro is a privately held company indirectly owned by China-based HNA Technology, a publicly traded company in the Shanghai Stock Exchange.

102-6: Markets served

Our products and services are available around the globe, where we create sales and profitability opportunities for resellers of information and communications technology equipment, value-added and corporate resellers, mobile network operators, retailers, custom installers, systems integrators, mobile (virtual) network operators, direct marketers, independent agents and dealers, product category specialists, reseller purchasing associations, managed services providers, cloud services providers, PC assemblers, IT and mobile device manufacturers and other distributors. Our retail clients

represent many sectors, from electronics, smart technologies and home entertainment to household goods, apparel and personal care.

102-7: Scale of the organization

We provide products and services to approximately 200,000 customers in 160 countries. In 2018, our infrastructure spanned more than 360 offices, distribution facilities and service centers in 58 countries with approximately 35,000 employees globally. Our total floor space exceeded 21 million square feet (nearly 2 million square meters). We ship over 500 million items every year, and our catalog offers more than 700,000 products. Ingram Micro represents more than 1,800 original equipment manufacturers (OEMs) and contracts with approximately 3,000 suppliers. We exceeded 3 million cloud seats in 2018. We're the largest wholesale technology distributor based on revenues and a leading provider of IT asset disposition services.

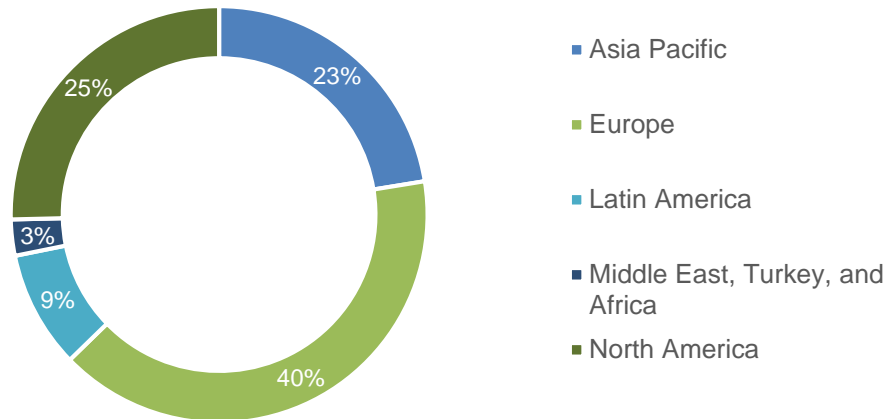


102-8: Information on employees and other workers

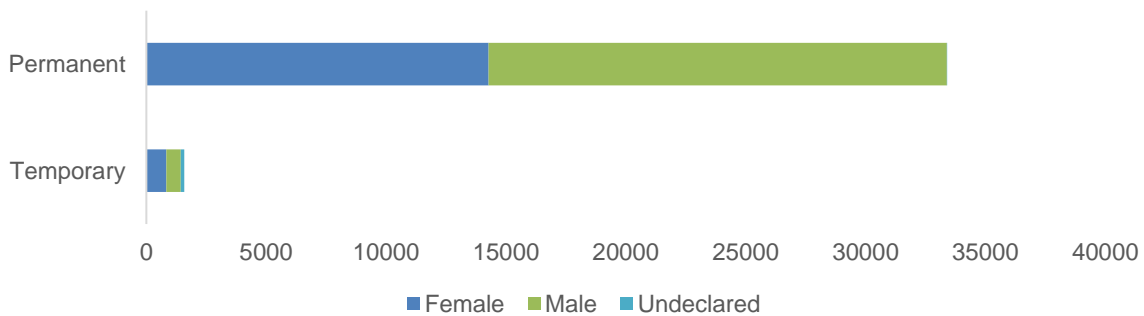
At year-end 2018, Ingram Micro employed 33,412 permanent and 1,576 contract employees worldwide. This represents a net increase in our workforce of 4 percent over year-end 2017.

We track headcount data in a human resources information system (HRIS). Where data is based on voluntary employee disclosure or country self-reporting, a portion of our data may be unavailable or undeclared. We state this where applicable.

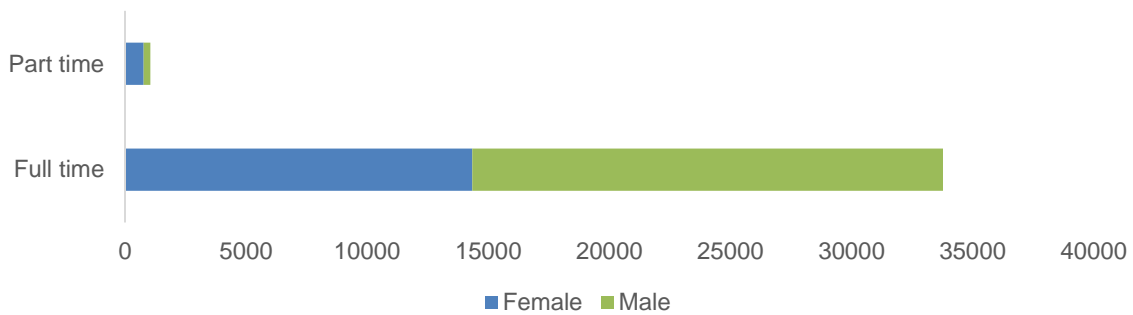
Regional Distribution of Permanent Employees



Employee Distribution by Employment Contract and Gender

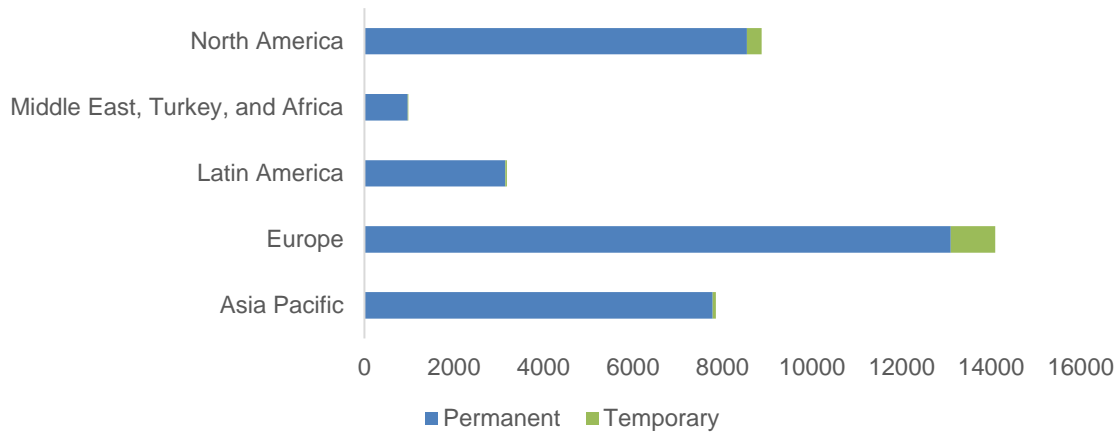


Employee Distribution by Employment Type and Gender



*Employment type data was not available for 160 employees.

Employee Distribution by Region and Employment Contract



We also employ a significant contingent workforce, which may reach 20,000 - 30,000 employees during the peak holiday season. These associates are employed by staffing agencies and work in our global warehouse operations under our supervision. This employment strategy enables us to meet client demand during high-volume periods.

102-9: Supply chain

We source non-inventory products and services from approximately 3,000 suppliers across the world. We also distribute and market hundreds of thousands of technology products worldwide from more than 1,800 computer hardware suppliers, mobility hardware suppliers, networking equipment suppliers, software publishers, cloud service providers, and other suppliers of computer peripherals, consumer electronics, unified communication and collaboration, automatic identification and data capture at point of sale, and physical security products.

Ingram Micro's significant upstream supply chain activities involve the purchase of supplies, services, software and equipment for use in operations; procurement of OEM products for resale; parts purchases for repair and refurbishment of electronic devices in our lifecycle services business; product takeback; transportation contracts; commercial real estate and agreements with employment agencies. We contract with a manufacturing facility in China to provide off-the-shelf electronic products for our V7 private-label brand.

Our primary downstream supply chain activities include distribution, delivery and service provision.

102-10: Significant changes to the organization and its supply chain

Relocating facilities and adjusting space based on business need is part of our strategy and as such, changes occur frequently. Therefore, facility openings, closings, expansions or contractions don't constitute significant changes to our organization.

We introduced our new Commerce and Lifecycle Services (CLS) organization globally to our partners and prospects, as we successfully combined commerce, fulfillment and lifecycle services. We are benefiting from efficiencies, shared expertise and improved collaboration, which positions us to expand global reach and shortening the time-to-market for the world's most recognized companies, while also helping to build emerging brands.

CloudBlue Technologies, the asset disposition company we acquired in 2013, has been integrated into our ITAD business. The CloudBlue brand name has been adopted by a new division of Ingram Micro, a commerce platform focused exclusively on helping service providers succeed in an as-a-service economy.

102-11: Precautionary principle or approach

Ingram Micro's approach to environmental risk management remains unchanged from the previous reporting period. The evaluation of operational measures has yet to go beyond known regulatory and customer requirements to consider the full spectrum of potentially adverse environmental impacts. We continue to raise awareness internally and encourage integration of environmental risk assessment practices into operations.

102-12: External initiatives

Since 2016, we've voluntarily subscribed to the code of conduct of the Responsible Business Alliance. We strive to adhere to the ILO Declaration on Fundamental Principles and Rights at Work, as stated in our Global Human Rights Policy, and promote the OECD Guidelines for Multinational Enterprises in our supplier code of ethics. We support the ten principles of the United Nations Global Compact. The initiatives we select seek to support the objectives of our business partners, reduce risk and align with our core values.

102-13: Membership of associations

Our company is a member of the following business associations:

Consumer Technology Association (CTA)
Transported Asset Protection Association (TAPA)
Association for innovation, business excellence, services and technology (AIBEST)
Coalition for American Electronics Recycling (CAER)
National Association for Information Destruction (NAID)
International Data Sanitization Consortium (IDSC)
Global Technology Distribution Council (GTDC)
Corporate Volunteer Counsel Orange County (CVCOC)
California Diversity Council
OneOC

Memberships are strategic with no substantive funding beyond membership dues.

Strategy

102-14: Statement from senior decision-maker

A Message from Alain Monié



In 2018, we continued to focus on our values, our talent and our commitment to excellence across our business activities.

Commitment to these principles empowered our associates to continue delivering an outstanding experience to our partners, who recognized our performance with the industry's top accolades. Consequently, we posted record financial results, exceeding USD 50 billion in net sales and USD 3 billion in gross profits for the first time in our company's history. We also remained committed to our corporate social responsibility (CSR) program with a focus on improving systems and processes, internal training and communication, and initiatives aimed at reducing risk.

We celebrated local community outreach and philanthropic efforts by our associates around the world. Compared to 2017, we increased charitable giving by nearly 6 percent, while reported volunteer hours rose from an estimated 5,600 to nearly 8,400.

We continued to explore potential efficiencies in energy management, as well as renewable energy options. In 2017, renewable energy comprised just over 1 percent of our total electricity use. This year, strategic virtual power purchase agreements resulted in nearly 10 percent of total electricity from renewable sources. We received a BREEAM rating of 85.4 percent on our carbon-neutral Advanced Logistics Center in the Dutch city of Tilburg. Our waste management practices also showed improvement with total reported waste nearly 15 percent lower compared to the previous year.

Our talented associates differentiate us in our industry, which gives me great confidence in our future. We sustained our investment in learning and development programs, supported more diversity initiatives and placed greater emphasis on occupational safety.

Long-term business success is predicated on many factors, including social stability, civil discourse, intact ecosystems and access to great talent. Addressing risk in these areas requires a collective approach, which is why we continue to support the UN Sustainable Development Goals. As our global sustainability program approaches its fourth year, we're evaluating next steps for a long-term strategy, one that prioritizes reducing our own impact, while supporting the corporate responsibility objectives of our partners and minimizing risk in our supply chain. I invite you to learn more about our CSR efforts and commitments, as we continue to help the world realize the promise of technology.

Alain Monié

Ethics and integrity

102-16: Values, principles, standards, and norms of behavior

We outline our principles and standards in our Code of Conduct, which is available to all stakeholders in 19 languages. In the U.S., we further communicate important policies in our Associate Handbook, which is issued to employees upon hire. These documents are developed in a multistakeholder process, administered via periodic training and approved at the executive leadership level.



Our values

Innovation

We constantly look for better ways to deliver value to our customers, shareowners, suppliers and fellow associates. We anticipate change and create the solutions before we are asked.

Accountability

We say what we do, and we do what we say. We consistently produce results that meet or exceed the expectations of our customers and suppliers. We accept our individual and team responsibilities to meet our commitments.

Integrity

We abide by the highest ethical standards, demonstrating honesty and fairness in every action we take, everywhere, all the time.

Teamwork and Respect

We honor the rights and beliefs of our fellow associates, partners and community. We treat others with the highest degree of dignity, equality and trust, leveraging diversity to meet our common goals. As a team, we deliver more than as individuals.

Learning

We continually acquire new knowledge to improve performance and enable growth, for our company and for ourselves.

Social Responsibility

We partner with our customers and suppliers to minimize our joint impact on the environment. We are responsible, active citizens in our communities through involvement, volunteerism and charitable giving.

Governance**102-18: Governance structure**

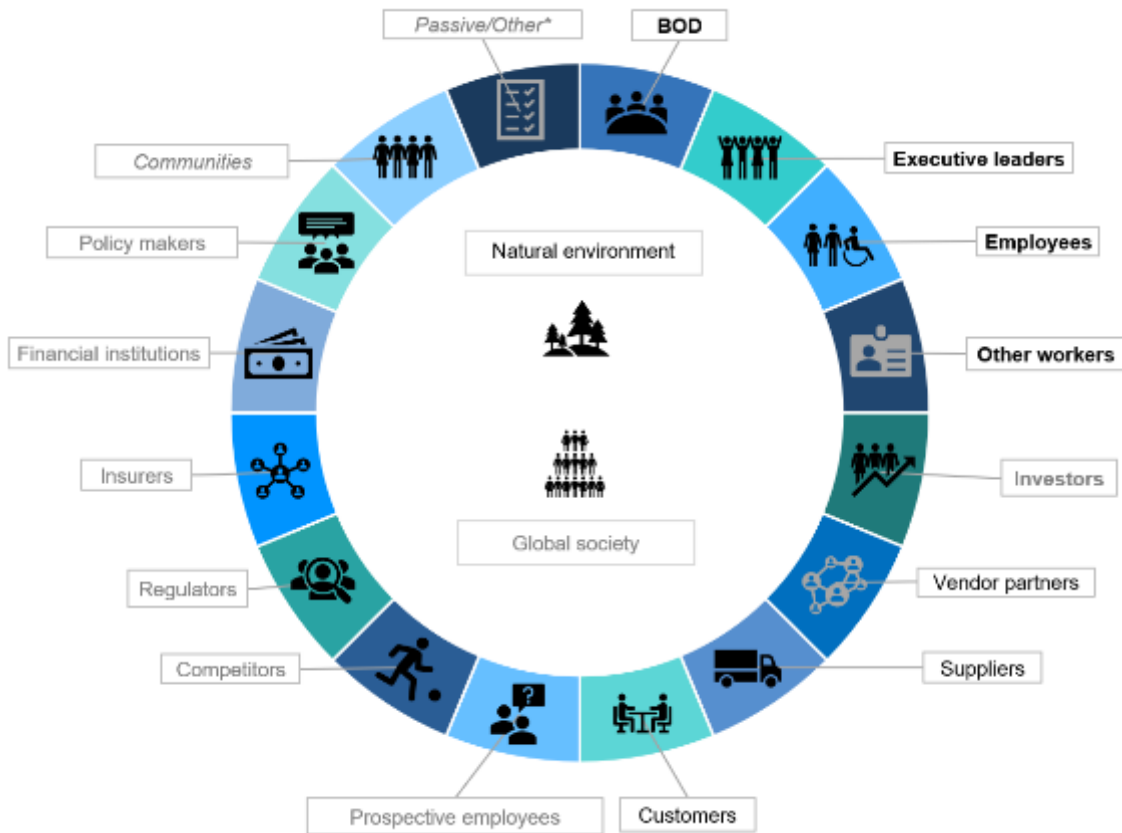
Our governance structure remained unchanged in 2018. The business and operations of Ingram Micro are directed and overseen by its board of directors, which is comprised of six members, five men and one woman. Five members are not affiliated with, and are therefore independent from, HNA Group and five are independent from management. Board committees include an audit committee and a government security committee. The board of directors convened four times during the reporting year. Daily oversight rests with the [executive leadership team](#), comprised of 13 members, including 11 men and two women. In 2018, seven senior executive leaders provided oversight of the corporate responsibility program, representing finance, global engineering, HR, legal and compliance, and regional operations. The committee convened once during the reporting year to evaluate program strategy, targets and resources.

While ESG topics are not a standard agenda item for our board meetings, the board did review the 2017 CSR report and the annual risk report of the World Economic Forum, and discussed risk related to developments in cybersecurity and labor practices.

As a matter of responsible governance, Ingram Micro made no contributions to political parties.

Stakeholder engagement

102-40: List of stakeholder groups



Bold font=internal | Black font=active | Italic=indirect influence

*Other passive stakeholders include consumer protection agencies, rating organizations, industry associations, end users, media, academia, and nonprofit organizations, among others.

102-41: Collective bargaining agreements

Due to our decentralized operating structure, obtaining an accurate count of employees covered under collective bargaining agreements is challenging. In the EU, we're unable to request union membership information from employees and can only account for employees with payroll deductions of union fees. Therefore, the number of union employees we can disclose relies on country participation in the data gathering process and their access to data. We counted 288 employees in the EU and in Chile who were union members in 2018, with the following unions reported: Sindicato Anovo Andes S.A., CWU, UNITE, NSZZ Solidarność, ACLVB, ABVV, ACV, Unie BHLF, FNV, CNV, DPDA, FO, CFDT, CFTC, CGT, CFE, CGC, CSIF, UGT and CCOO. This represents less than 1 percent of our workforce.

102-42: Identifying and selecting stakeholders

Our stakeholder groups remain unchanged from the previous reporting year. We divide stakeholders by their position relative to the company (i.e., internal or external), their level of influence (i.e., direct or indirect) and whether they have an active or passive role in our day-to-day operations.

We engage with stakeholders who are likely to have a significant impact on our company and who are most likely to be impacted by our business activities. We focus on stakeholder groups that have potential for collaboration, such as employees and other workers, local communities, prospective employees, customers, vendors and suppliers. Resource constraints further limit the breadth of our engagement efforts, though we seek to fill gaps with publicly available information. We consider the natural environment and global society in our assessment as well, though categorizing them is difficult. After all, the stakeholder groups we identified are all part of our global community, but they don't fully represent it. We therefore need to include society at large as a separate stakeholder group to capture important meta trends for our materiality assessment. The natural environment is intrinsically tied to global society and affects businesses directly and indirectly.



102-43: Approach to stakeholder engagement

Our overall stakeholder engagement approach remained unchanged from the previous year, but some components were limited or omitted in 2018 due to resource constraints. First, we did not repeat our annual anonymous employee CSR survey, but instead worked on developing a more comprehensive version to circulate in 2019. Second, our workplace satisfaction survey remained on hold as we developed a different version for 2019 as well. Lastly, we did not formally analyze meta trends in sustainability, due to time constraints within the CSR department. We conduct a comprehensive formal stakeholder engagement to the AA1000 SES standard at three-year intervals and are

preparing for our second engagement in 2019. In the table below, we summarize engagement by stakeholder group, indicating frequency, whether we undertake the activity specifically for reporting purposes and whether the activity occurred in 2018. Italicized line items indicate activities we were scheduled to perform but failed to complete during the reporting year.

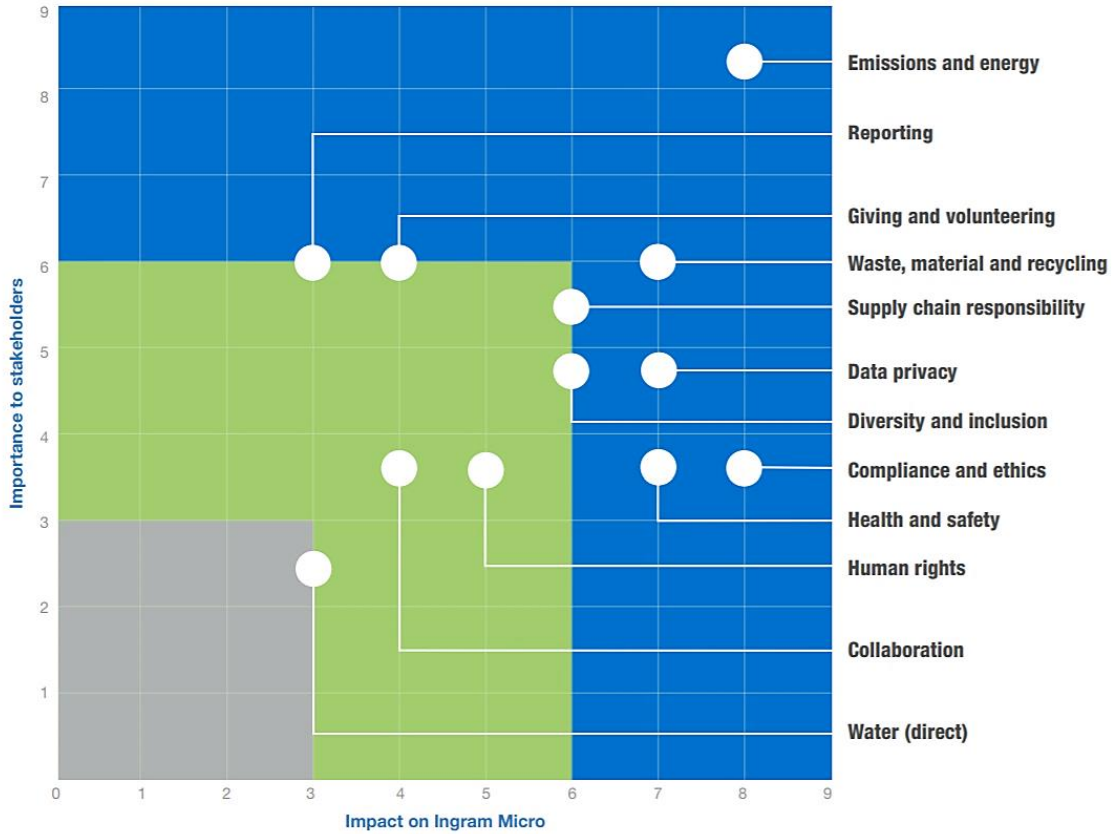
Stakeholder Group	Engagement activity	Frequency	Report-specific	Last performed
Employees	<i>Anonymous sustainability survey</i>	Annual	Yes	2017
	Informal dialogue	Ongoing	No	2018
	<i>Workplace satisfaction survey</i>	Every other year	No	2016
Leadership	Executive CSR committee meeting	Annual	No	2018
	Periodic CSR communication	Ongoing	No	2018
Suppliers	Risk assessment survey	Ongoing	No	2018
Partners	Customer/vendor experience survey	Annual	No	2018
	Informal dialogue	Ongoing	No	2018
	Analysis of sustainability requirements	Annual	No	2018
	Third-party sustainability assessments of Ingram Micro	Annual	No	2018
	Social media and formal external communication	Ongoing	No	2018
Analysis of meta trends	<i>Non-financial performance analysis based on review of published sources</i>	Annual	No	2017
Advocacy groups	Corporate Equality Index from the Human Rights Campaign	Annual	No	2018
Media	Analysis of coverage	Annual	No	2018
Community	Targeted stakeholder interviews	Every three years	Yes	2016
	Community service	Ongoing	No	2018
Policy makers	Review of socio-environmental regulatory trends	Ongoing	No	2018

102-44: Key topics and concerns raised

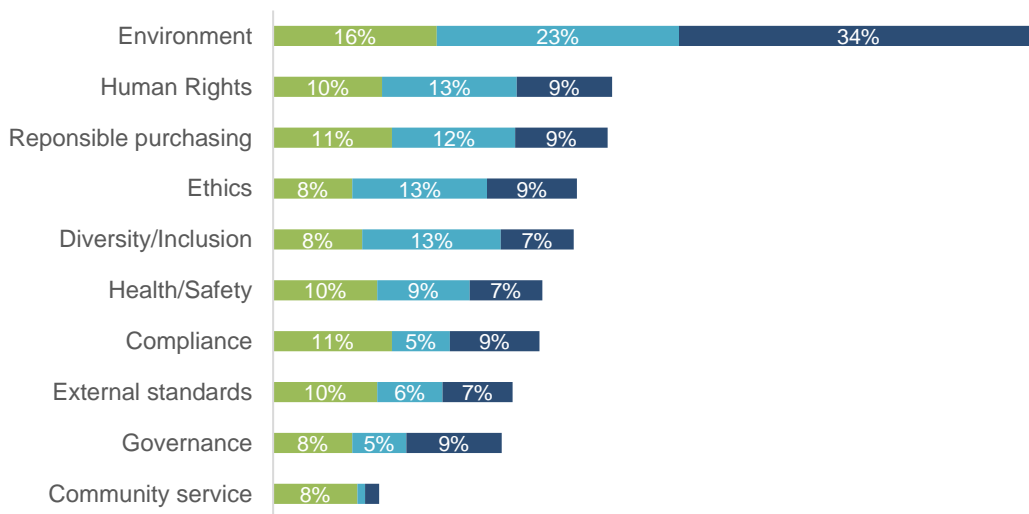
We're once again relying on the materiality matrix we developed following a multi-stakeholder engagement process in 2016. While we lacked capacity to perform some scheduled stakeholder activities in 2018, we found that climate change, waste, and responsible purchasing continued to be of primary interest to our partners, while inquiries regarding community development declined. Human rights, diversity and ethics, including responsible governance, received noticeably more attention in 2018 than in years prior.

In global trends, risk from extreme weather events, failure to mitigate climate change impacts and cybercrime remained key concerns. The 2018 IPCC Special Report on Global Warming of 1.5°C further emphasized the urgency of responding to climate change within the next decade.

We'll update our materiality matrix again in 2019 to capture these shifting priorities.



Distribution of sustainability-related customer inquiries by topic



Community service-related questions comprised 1% of all inquiries in 2018 and 2019.

Reporting practice

102-45: Entities included in the consolidated financial statements

[Click here](#) to view all 245 Ingram Micro entities as of December 29, 2018.

102-46: Defining report content and topic boundaries

As we mapped out our reporting approach, we relied primarily on the outcomes of our 2016 stakeholder engagement process, the GRI framework itself and the UN Sustainable Development Goals to determine report content. We then narrowed the scope based on our limitations. For example, we focused only on the top 12 material impacts identified as important to stakeholders. This enables us to pursue measurable results in the areas that matter most to them.

We prioritized impacts we can directly influence, though we expect to branch out into our supply chain in 2019. We're still refining data access, collection and quality across our 360+ facilities, which limits the level of detail we can report for several topics. We're transparent about these difficulties wherever we present data in this report. Additionally, corporate responsibility continued to be an individual contributor role throughout the reporting year, requiring prioritization of issues and initiatives to match available resources.

The principle of sustainability context was integrated in the early planning stage of the reporting process. We applied stakeholder inclusiveness and materiality as we developed and executed a formal stakeholder engagement process.

102-47: List of material topics

Economic topics: Economic Performance, Anti-corruption, Anti-competitive Behavior

Environmental topics: Materials, Energy, Water, Emissions, Effluents and Waste, Environmental Compliance, Supplier Environmental Assessment

Social topics: Customer Privacy, Socioeconomic Compliance, Employment, Occupational Health and Safety, Training and Education, Diversity and Equal Opportunity, Child Labor, Forced or Compulsory Labor, Supplier Social Assessment

102-48: Restatements of information

There are no restatements.

102-49: Changes in reporting

In 2018, after collecting three consecutive years of energy data in our online information management system, we concluded that manually collected 2015 data was not reliable. Due to the difficulty of retroactively correcting the 2015 data set, we agreed to move our base year from 2015 to 2016. This eliminated an artificial drop in our emissions from 2015 to 2016 and more accurately represents our progress. We'll report data for 2016-2018 in this report for clarity.

This is the first report we've prepared using the GRI's digital reporting tool, though we're making this alternative format available for stakeholders who prefer to browse the report in full. Please [click here](#) to access the report as prepared with GRI's reporting tool.

102-50: Reporting period

January 1 – December 31

102-51: Date of most recent report

Our previous report was published in 2018 and covered full-year 2017.

102-52: Reporting cycle

We report annually.

102-53: Contact point for questions regarding the report

Please email sustainability@ingrammicro.com with your feedback and questions.

102-54: Claims of reporting in accordance with the GRI Standards

This report has been prepared in accordance with the GRI Standards: Core option.

102-55: GRI content index

Please [click here](#) to view.

102-56: External assurance

The information in this report has not been assured by a third party.

Economic Topics

Economic Performance

GRI 103: Management Approach 2016

103-1: Explanation of the material topic and its boundary

Like most B2B enterprises, we contribute to economic development through job creation, employee development, tax payments, supply chain spending, and provision of products and services that support customer objectives for business development and growth. We drive resource efficiency through our expertise in logistics solutions, coupled with the scale of our operations and our internal focus on lean practices. In addition, our commitment to increasing technology access around the world contributes to the development of new markets and a higher standard of living. In our CSR report, we focus primarily on economic outcomes in the context of sustainable community development.

103-2: The management approach and its components

Our contributions include employee volunteerism, matching gift programs, sponsorships, monetary and in-kind donations for various causes, including disaster relief, and representation on the boards of nonprofit partner organizations. We focus primarily on small grants in support of dozens of community organizations in countries where we operate. Nonprofits must meet our giving guidelines and are evaluated by local

philanthropic and community relations committees. In addition, we offer internships, externships and apprenticeships.

Each year, we select employees or employee groups to receive our Martha Ingram Leadership Award, which recognizes those who exemplify the business leadership and philanthropic legacy of our former chairman and CEO, Martha Ingram. Our 2018 winners included:

- Patrick Smith, Technology Consultant II at our Buffalo, NY office
- Our Manila H.O.P.E Committee, comprised of John Philip Lim, Afra Amaro, Maridol Manicdo, Cyril Mendez, Catherine Benedicto, Kish Matute, Fran Resultay and Michael Mariano
- Our Sofia CSR Activity Group (below), comprised of Kostadinka Kaludincheva, Reneta Milanova, Svetoslav V. Dimitrov, Mincho Donev, Manon Valcheva, Vesselina Peycheva, Natali Nikolova, Emanuil Rusinov, Rangel Milev, Nadya Zhekova, Irina Lazarova, Jola Luga, Olia Aleksandrova, Boryana Zasheva, Stoyan Petleshkov, Diana Nikolova, Gergana Mancheva and Nikolay Nikolov



103-3: Evaluation of the management approach

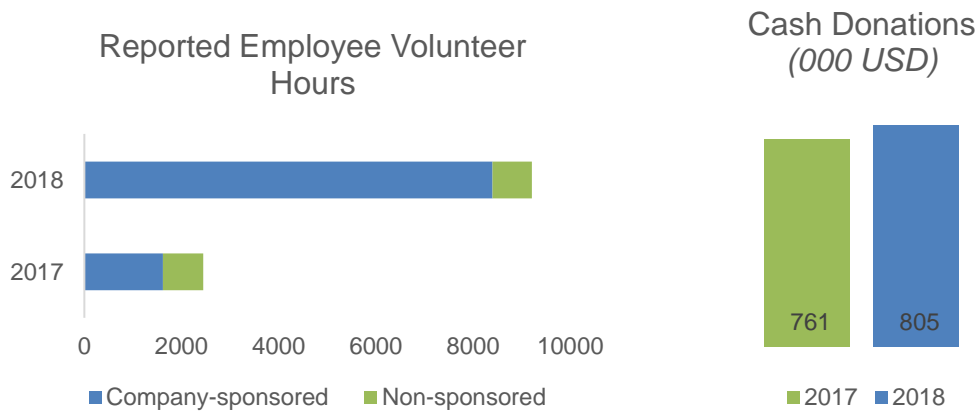
We collect data for basic drivers of outcomes, such as the number of program participants, value of cash donations, time invested, and in some instances, the number of community members served. We're not yet evaluating the outcomes themselves and don't require progress reports from our non-profit partners.

GRI 201: Economic Performance 2016

201-1: Direct economic value generated and distributed

We publicly post quarterly financial performance results here: <https://ingrammicro.gcs-web.com/financial-information/quarterly-results>. Information omitted from these financial statements and this report is deemed confidential.

Our 2018 global charitable donations amounted to just over USD 800,000, a nearly 6 percent increase compared to 2017. This figure includes USD 220,700 disbursed under donor-advised fund deposits of USD 250,000. Our reported company-sponsored volunteer hours increased by more than 400 percent, though this is at least partially attributable to improved data collection practices across our global operations.



Our 2018 matching gift contributions exceeded USD 100,000 and our single largest grant of USD 75,000 aided disaster relief efforts following California wildfires. In California, our CEO is an executive committee member of the CEO Leadership Alliance of Orange County, which collaborates with nonprofit organizations, government agencies, businesses and universities to add 100,000 new high-value jobs, while developing local talent to fill them.

In addition, members of our executive leadership team hold positions on committees or boards of the following nonprofit organizations and institutions of higher education:

Susan G. Komen	Children’s Bureau (SoCal)	Chapman University
Girl Scouts Orange County	Alzheimer’s Orange County	CSU Fullerton

We support a wide spectrum of charitable causes through a decentralized approach. This allows local leaders and employees to address pressing needs in their own communities. In addition, through our donor-advised fund, we were able to support 58 Ingram Micro employees who had been affected by hurricanes, earthquakes and fires. A total of USD 131,500 was donated to our associates in 2018.

During the reporting year, we provided volunteer, financial and in-kind support to these and other nonprofit organizations, in addition to organizing supply and food drives that directly benefited families in need.

- | | |
|----------------------------|--------------------------------------|
| 1888 Center | OC Food Bank |
| Boystown Foundation | Ocean Conservancy ICC |
| Cantabria Acoge | Olive Crest |
| Cribs Foundation | Pediatric Cancer Research Foundation |
| Dubai Cares | Red Cross |
| Festival of Children | Rise Against Hunger |
| Food Bank of West New York | Roswell Park CCC |
| Gawad Kalinga | Salvation Army |
| Global Impact | Susan G. Komen |
| Haribon Foundation | The Giving Farm |
| Harry's Rainbow | Together We Rise |
| Hearts for the Homeless | United Way |
| KidWorks | Willen Hospice |
| Matt Urban Hope Center | Women Helping Women |
| Newport Beach Conservancy | YANA Cancer Comfort |



Ingram Micro associates in Buffalo, New York, packed and distributed 300 “winter essential bags of love” with funds donated by the Ingram Micro President’s Club

201-2: Financial implications and other risks and opportunities due to climate change

We didn't suffer any direct losses from severe weather events or natural disasters in 2018, and we didn't attempt to quantify indirect losses within our supply chain. However, our annual climate change risk assessment reveals numerous risks and opportunities. We categorize these risks by risk type and whether they are relevant to our business activities and included in regular risk assessments.

Our process for assessing global climate-related risks involves regular review of scientific literature, global environmental, socio-economic and geopolitical trends (e.g., annual risk report of the World Economic Forum, IPCC reports), compliance intelligence and developments in energy markets. Every three years, we formally engage with our stakeholders to determine the level of risk perceived by associates, business partners, customers and communities. In addition, we periodically assess country-level risks from climate change. We also participate in sustainable business conferences and review information from NGOs and the nonprofit sector to better understand risks and mitigation strategies across various activities.

Risk Type	Relevance & inclusion	Explanation
Current regulation	Relevant, always included	Compliance is a basic stakeholder expectation and non-compliance carries financial and reputation risks. We employ a third-party compliance intelligence service to ensure we're aware of current regulations.
Emerging regulation	Relevant, always included	We closely follow global policy developments, so we can prepare well in advance of regulatory changes that may affect our business. We regularly consult with subject matter experts for updates on global, regional and country-level developments.
Technology	Relevant, always included	As a technology solutions provider and distributor of technology products, we constantly monitor opportunities arising from innovative technologies. We're aware of increased interest by companies to deploy IoT and AI-based solutions for emissions reduction.
Legal	Not relevant, explanation provided	Our business is at low risk of climate change-related litigation. Our scope 1 and 2 emissions are primarily generated by leased commercial properties and we don't operate a fleet. Most of our impact stems from supplier activities and in the current regulatory environment, we're at low risk of being held legally liable for supplier activities.
Market	Relevant, always included	The chronic effects of climate change may shift markets further toward low-carbon products and away from linear consumption models. Since we rely on OEM products in our sales and distribution channels, lack of adaptation in the manufacturing

		sector could impact our business. We already participate in take-back schemes and provide repair, refurbishment and recycling of electronics to meet demand in these areas. We've also expanded our cloud and as-a-service offerings in response to market demand.
Reputation	Relevant, always included	As a B2B company, we value our reputation with our business partners. Our customers strongly influence the direction of our CSR strategy, often providing very specific expectations or feedback on emissions reduction targets and progress. As a supplier to the largest tech OEMs and Telcos around the world, our actions on climate factor into the achievement of their scope 3 emissions targets.
Acute physical	Relevant, always included	Acute risks from climate change have already affected us. Severe weather events disrupted some of our operations in 2017 and resulted in financial impact. Contingency planning is becoming increasingly important, as fires, floods, and other severe weather events can have an immediate impact on our operations at any time.
Chronic physical	Relevant, always included	We're already experiencing chronic climate change effects in the form of heat waves and droughts. While we're not currently measuring productivity losses from chronic physical impacts, we can reasonably assume at least minor losses. In addition, communities in which we operate are impacted and may experience negative economic consequences over time, as evidenced by migration patterns from areas that can no longer sustain their population due to resource depletion. To sustain our business, we're reliant on stable communities.
Upstream	Relevant, always included	Upstream risks are related to all previous risks as they pertain to our vendors and suppliers. For example, water availability could significantly impact our manufacturing partners and thereby our supply. On the other hand, building efficiency rules would result in utility savings in properties we lease. Risks and opportunities in our supply chain are indirect risks and opportunities for Ingram Micro.
Downstream	Relevant, always included	Our downstream business partners are affected by market trends, consumer opinion and consumer protection laws, which affect us in the form of more stringent customer requirements. These have been a significant driver of our CSR approach and we analyze them at least annually. We also see potential opportunities in downstream developments, such as fleet electrification, which could result in future cost-savings.

Additional details on risks with potentially substantive financial or strategic impacts can be found in our [2019 CDP response](#).

2018 Contribution to SDGs

As of 2017, we evaluate our performance against the UN Sustainable Development Goals (SDGs), using data-based evidence to support our ratings. Throughout the report, we indicate our progress on SDGs we're currently taking into consideration. SDGs not listed in this report are either not applicable to us or we've not yet connected them to business activities (see SDG matrix in Custom Topics).

We achieved some progress on SDG 4 by providing skills development to externs, interns and apprentices. In addition, we promoted entrepreneurship, innovation and creativity through the international Comet Competition in partnership with MassChallenge. The competition awards USD 5,000,000 in funding to 60 independent start-up software vendors across five continents.

We have an opportunity to better promote diverse businesses in our supply chain.

SDG 4	Target	No significant progress	Some progress	Significant progress
4.4	By 2030, substantially increase the number of youth and adults who have relevant skills, including technical and vocational skills, for employment, decent jobs and entrepreneurship.		✓	

SDG 8	Target	No significant progress	Some progress	Significant progress
8.3	Promote [...] productive activities, decent job creation, entrepreneurship, creativity and innovation, and encourage the formalization and growth of micro-, small- and medium-sized enterprises, including through access to financial services		✓	

While we donated to and volunteered for organizations aiming to address a range of SDGs, including hunger relief, eradicating poverty, and promoting health, education and equality, these efforts were not part of a strategic plan to support the SDGs, and we didn't gather progress data.

Anti-corruption

GRI 103: Management Approach 2016

103-1: Explanation of the material topic and its boundary

Integrity is one of our values and is fundamental to our ability to establish trust with our partners and protect our reputation. Fair business practices sustain markets in the long-term. We manage anti-corruption as part of a broader, formal compliance effort that includes data privacy, anti-bribery, conflict of interest, trade controls, anti-money laundering, gray market, antitrust risk, harassment and whistleblower compliance. Our compliance management system spans all operating regions, markets in which we have presence, and all Ingram Micro entities.

103-2: The management approach and its components

Our compliance management program is centralized and overseen by the audit committee of the board of directors. The program consists of a formal management system structure supported by policies, risk assessments, internal audits, corrective actions and controls, periodic employee training and a mechanism for reporting concerns and grievances. The compliance team develops our company's code of conduct and works across regions and functions to prevent and address instances of non-compliance.

Our associates are encouraged to report concerns to their supervisors, human resources or their designated compliance officers. Stakeholders who wish to remain unnamed have the option of reporting anonymously to our third-party hotline, which is accessible 24/7. Our anti-retaliation policy supports our Sunshine Rule, encouraging employees to bring ethics concerns to light immediately.

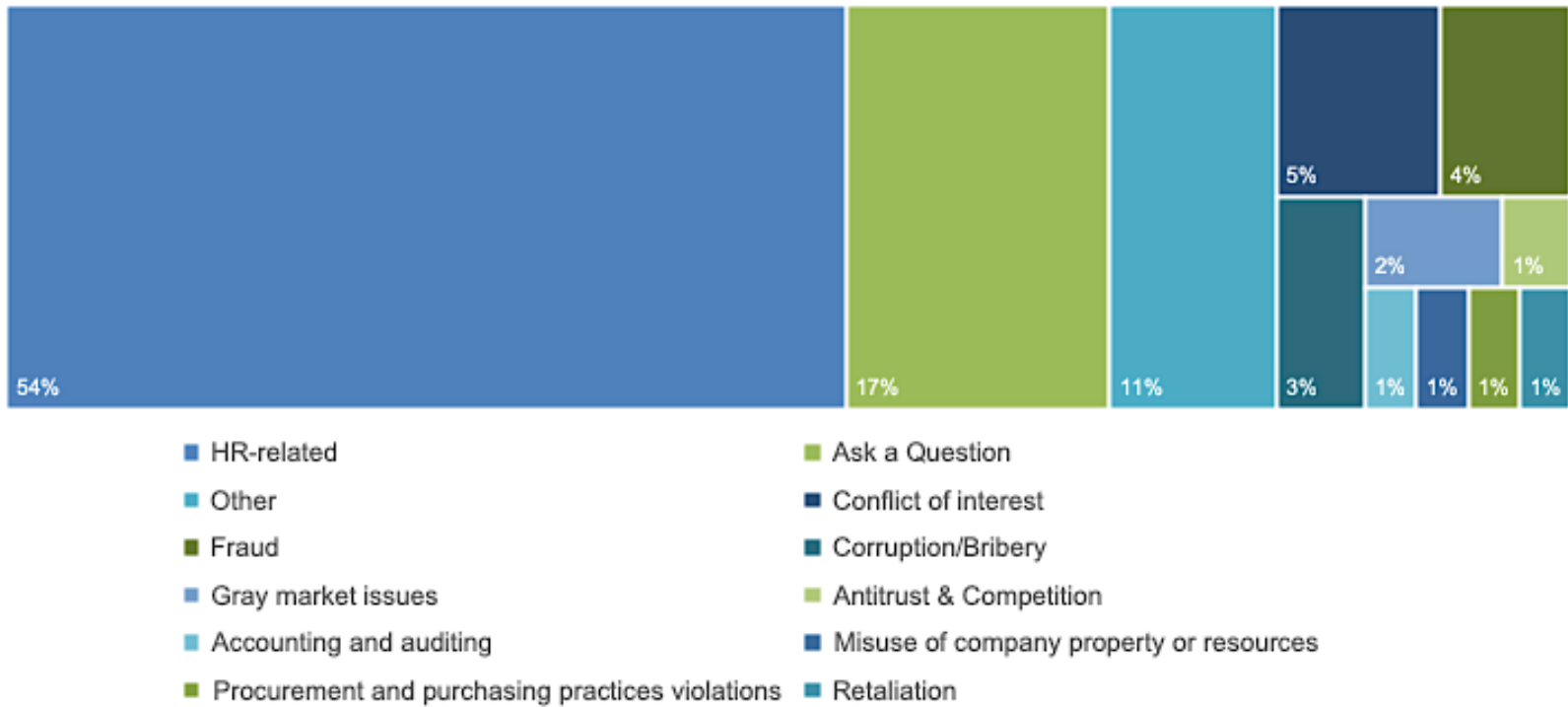
103-3: Evaluation of the management approach

Ingram Micro's risk assessment evaluates ethics risks posed by charitable donations, marketing funds and pass-throughs, special pricing, commissions, gifts and entertainment, agents and consultants, interactions with foreign governments, country-specific customs, awareness of cultural nuances, and sourcing and procurement activities. The risk assessment questionnaire targets local managers and is completed when necessary by focus group discussions with associates. Regional compliance officers document the responses and discussion outcomes in reports submitted to the chief compliance officer (CCO). The CCO maps our evolving risk environment against our controls and adapts our policies accordingly. Our internal auditors test the effectiveness of our policies. Our anti-bribery management system has also been externally verified by Ethisphere to meet the requirements of ISO 37001:2016.

In 2018, our third-party hotline received 0.87 reports per 100 employees, down from 0.91 in 2017, versus the *Navex Global 2018 Hotline & Incident Management Benchmark* of 1.4. Fifty-four percent of these cases were related to human resources issues, versus the Navex Global benchmark of 72 percent.

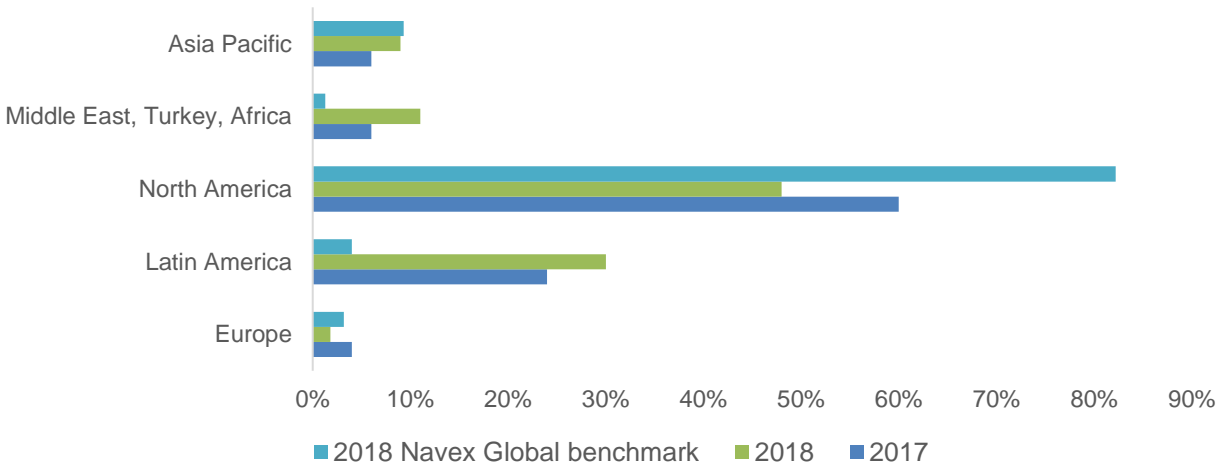
Other case types included anti-trust matters, accounting and auditing matters, compliance questions, conflict of interest, corruption or bribery, fraud, misuse of company property, violation of purchasing practices and gray market issues.

2018 Hotline Cases by Type



We also assess the number of cases by region. While there has been little change over the prior year in reported case types, we saw shifts in case allocation by region, indicating that higher-risk regions are increasingly leveraging our reporting tools. We compared our results to those reported in the 2018 Navex Global report.

Case Allocation by Region



In addition to case types and regional allocation, we evaluate the following:

- Awareness trend tracking to measure progress in our speak-up culture
- Anonymous reporting rate to evaluate fear of retaliation, compared to benchmark
- Substantiated reports rate trend and comparison to benchmark
- Case resolutions by type of action taken
- Substantiated anonymous reports versus substantiated named reports

GRI 205: Anti-corruption 2016

205-1: Operations assessed for risks related to corruption

More than 90 percent of our global operations have been assessed for risk related to corruption and other compliance issues.

Our most significant risks in this area involve the misuse of marketing development funds, special bid pricing and third-party payments.

205-2: Communication and training about anti-corruption policies and procedures

Our training spans multiple compliance issues and our completion rate normally exceeds 90 percent. However, due to unforeseen issues with our recently implemented online learning management system, multiple employees were not notified of their training assignments, resulting in a completion rate of only 82 percent during the reporting year. We've addressed this issue and expect to see a significant improvement in 2019. Our courses generally cover the following topics:

- Our code of conduct
- Anti-bribery
- Fair competition
- Sexual harassment
- Conflict of interest
- Trade compliance
- Data protection and privacy
- Reporting grievances or concerns

Approximately 80 percent of Ingram Micro employees worldwide have ongoing access to a compliance policy portal on our intranet, and we're continuously striving to integrate associates from acquired companies.

Training indicator	2017	2018
Total enrollments	37,763	44,654
In-person training	10,493	7,702
Annual Legal and Compliance Certificate survey distribution	22,366	32,956
Annual Legal and Compliance Certificate survey completion	100%	100%

Bonus pay for executive directors and above is tied to the annual completion of any assigned online compliance training.

205-3: Confirmed incidents of corruption and actions taken

We are not aware of any material incidents of corruption in 2018.

2018 contribution to SDGs

Although there were no instances of criminal corruption or anti-bribery, we were penalized for anti-competitive behavior, which is part of the same compliance management system. Our training administration challenges were unforeseen and are expected to be fully resolved in 2019. While our compliance management system is mature, we'll remain focused on maximizing effectiveness across our operations.

SDG 16	Target	No significant progress	Some progress	Significant progress
16.5	Substantially reduce corruption and bribery in all their forms	✓		

Anti-competitive Behavior

GRI 103: Management Approach 2016

103-1: Explanation of the material topic and its boundary

See Disclosure 205 - Anti-Corruption Management Approach.

103-2: The management approach and its components

See Disclosure 205 - Anti-Corruption Management Approach.

103-3: Evaluation of the management approach

See Disclosure 205 - Anti-Corruption Management Approach.

GRI 206: Anti-competitive Behavior 2016

206-1: Legal actions for anti-competitive behavior, anti-trust, and monopoly practices

During the reporting year, the Vienna Antitrust Court imposed a fine of EUR 289,000 on Ingram Micro Austria for several instances of price-fixing among electronics retailers between 2012 and 2017. Ingram Micro fully cooperated with authorities during the investigation and has taken internal measures to ensure compliance, including intensive re-training of our staff in Austria.

2018 Contribution to SDGs

See SDG table accompanying Disclosure 2015 – Anti-Corruption Management Approach.

Environmental Topics

Materials

GRI 103: Management Approach 2016

103-1: Explanation of the material topic and its boundary

Our primary use of materials is related to shipping packaging, including corrugated cardboard, void fill, pallets, edge and corner protectors, mixed packaging media, film and labels. While most of these supplies are sourced externally, we reuse some materials in operations, such as incoming cartons, pallets or edge protectors applied to outgoing shipments. We also consume materials in our lifecycle business, some of which are externally sourced and some of which are mined from disassembled product. We generally don't source raw materials. The topic is only relevant to our non-administrative facilities, including warehouses and facilities engaged in electronics repair and recycling. Packaging supplies we purchase at the direction of our customers are excluded from scope, since those decisions are not within our control.

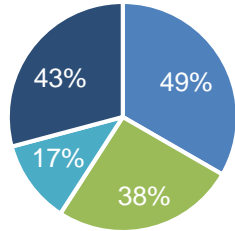
103-2: The management approach and its components

We've not yet developed a strategic approach to responsible shipping materials management, although some of our facilities have implemented material efficiency projects. Our corporate social responsibility department provides support for individual projects upon request. In addition, several facilities operate right-sizing equipment that customizes carton sizes and reduces void. We've not set any targets related to materials. We're currently tracking cardboard, including the known percentage of recycled material inputs, but our global reporting rate for cardboard is only 43 percent (up from 30 percent in 2017). This is insufficient to set a baseline and we'll continue to work on increasing our site-level participation in the reporting process.

The global reporting rate for refurbished or recycled customer IT assets is 93 percent. Customer electronics repair and recycling indicators are attached to business development targets. Our IT asset disposition (ITAD) facilities are e-Stewards certified in the U.S. and maintain R2 certification at two locations in India and one in the U.K. Additional certifications include ISO 14001, OHSAS 18001, ISO 27001 and ADISA (at our U.K. site only). These sites also follow industry best practices for security as outlined by TAPA. In the U.S., Ingram Micro is a steering committee member of CAER, which advocates for responsible electronics recycling.

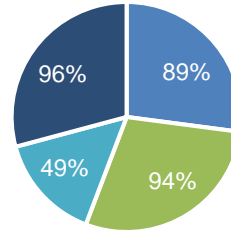
Regional reporting rate for shipping cardboard use

■ NA ■ EMEA ■ LATAM ■ APAC



Regional reporting rate for customer IT assets processed

■ NA ■ EMEA ■ LATAM ■ APAC



103-3: Evaluation of the management approach

No evaluation mechanisms are currently in place. Due to underreporting of shipping cardboard, our data sets are unreliable to perform year-over-year comparison.

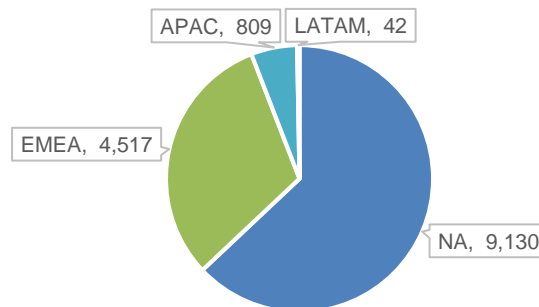
GRI 301: Materials 2016

301-1: Materials used by weight or volume

We wanted to focus on our highest volume of shipping materials when we introduced our environmental data collection process in 2017. Therefore, we’re tracking cardboard used for cartons, but we’ve yet to measure the consumption of void fill and cling film we’re using in the preparation of shipments. We’re also not currently tracking edge and corner protectors, pallets, label materials, poly straps and mixed material packaging, such as bubble-lined poly mailers, for example. Once cardboard tracking is more widely adopted, we’ll consider adding other materials to the tracking process.

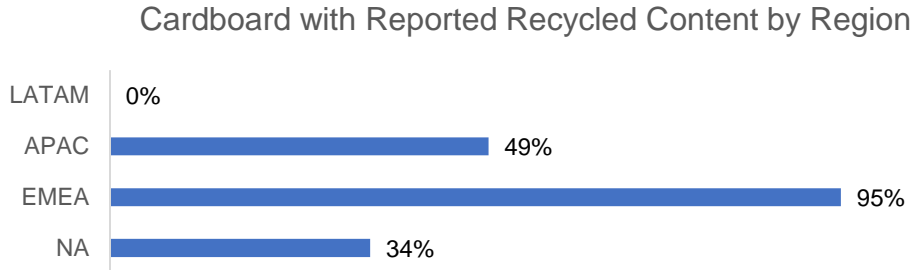
The cardboard we’re tracking is a renewable resource and total reported use by weight in 2018 was just under 14,500 metric tons. When regionally extrapolated to facilities that ship product but have failed to report cardboard use, the estimated total is nearly 33,000 metric tons. In 2017, we estimated cardboard use of just over 38,000 metric tons, but actual data was more limited compared to 2018.

Reported Cardboard Consumption by Region (MT)



301-2: Recycled input materials used

For the cardboard we’re tracking, we’re requesting that facilities report post-consumer recycled (PCR) and post-industrial recycled (PIR) content. Not all sites have been able to obtain this information from their vendors. As reported, 54 percent of cardboard contains recycled materials, though we suspect the actual figure to be higher. We’re not yet tracking the weight of the recycled material. Sites report the weight of cardboard with any amount of PCR or PIR content, be it 5 percent or 100 percent. We’ll revise this process once basic reporting has been more widely adopted.



2018 contribution to SDGs

We’re still attempting to obtain reliable data across our global facilities and consequently, have been unable to set targets for sustainable use of materials. While some sites have implemented projects to reduce packaging material, there’s no strategic effort across the organization. In addition, we have yet to adopt responsible resource use as a purchasing function. We plan to assess our material footprint and develop intensity targets once we receive annual data from most of our global facilities.

SDG 8	Target	No significant progress	Some progress	Significant progress
8.4	Improve progressively, through 2030, global resource efficiency in consumption and production and endeavor to decouple economic growth from environmental degradation.	✓		

SDG 12	Target	No significant progress	Some progress	Significant progress
12.2	By 2030, achieve the sustainable management and efficient use of natural resources.	✓		



Ingram Micro Germany clean-up volunteers (left to right): Carlo Lopomo, Lisa Stuiber, Karin Staudacher, Laura Lipp and David Groth

Energy

GRI 103: Management Approach 2016

103-1: Explanation of the material topic and its boundary

Nearly all our scope 1 and 2 emissions result from energy use. Therefore, we manage energy and emissions under one umbrella. See disclosure 305 – Emissions.

103-2: The management approach and its components

We deploy the same management approach for energy and emissions. See disclosure 305 – Emissions.

103-3: Evaluation of the management approach

We use the same methods to evaluate our energy and emissions performance. See disclosure 305 – Emissions.

GRI 302: Energy 2016

302-1: Energy consumption within the organization

We consume natural gas to heat our buildings. Other fuels are primarily used in vehicles and generators. We didn't consume any fuels from renewable sources during the reporting year.

Fuel type	MWh	Gigajoules
Mobile diesel fuel	7,914	28,490
Stationary diesel fuel	943	3,395
Gasoline	2.53	9.10
Propane	164	589
Total natural gas - including extrapolations	90,435	325,565
Total	99,458	358,049

We consume electricity in our buildings, including lighting, cooling and equipment use. We didn't sell any electricity, heating, cooling or steam during the reporting year.

Energy type	MWh	Gigajoules
Electricity from non-renewable sources (including extrapolation)	135,167	486,600
Electricity from renewable sources (including RECs)	14,606	52,580
Purchased heat	2,695	9,702
Purchased steam	49	175
Total	152,516	549,058

Our total energy consumption in 2018 was 907,107 gigajoules (251,974 MWh), a 1.3 percent reduction over the prior year. Renewable energy comprised 5.8 percent of total reported energy use and 9.6 percent of global electricity use, exceeding our 2020 target of 5 percent renewable electricity.

Year-over-year energy consumption in thousands of gigajoules



Among the energy types we track, our electricity figures are most reliable and reported by over 95 percent of facilities by floor space. For nonreporting facilities, we estimated usage by applying average per-floor-space-unit consumption in close geographic proximity (e.g., city or country) to the occupied floor space of the nonreporting facility. Sites located in multitenant administrative buildings apply the partitioning method to estimate annual electricity consumption based on occupied space and overall building consumption. Fuel consumption reports are far more inconsistent and we're unable to extrapolate due to variables at each site. We're working to improve the process through

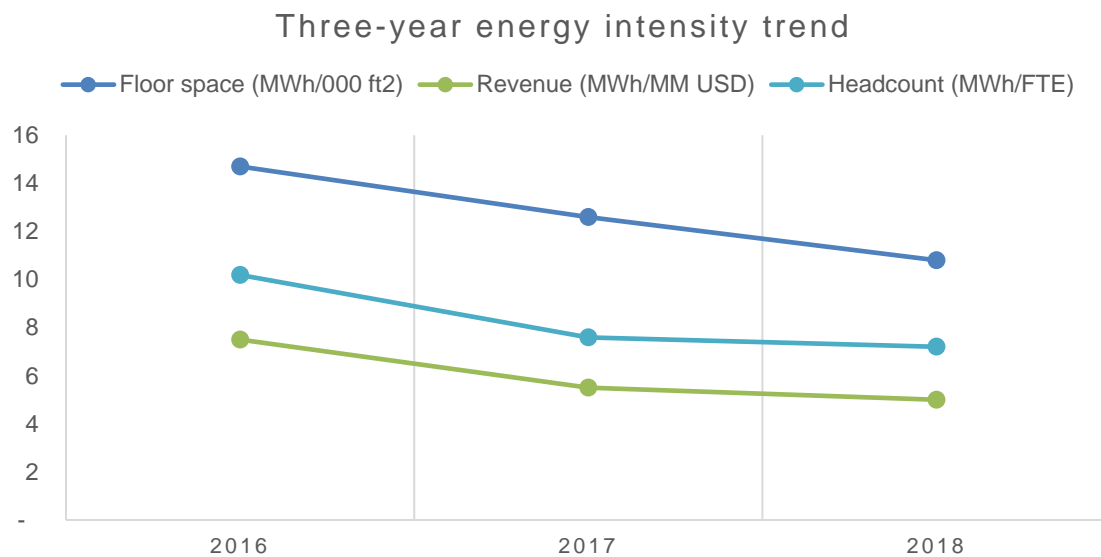
continuous training and communication. Data sources vary widely and include utility invoices, meter readings, and verbal or written information provided by building owners.

We deployed an information management system in 2016 to aggregate our global sustainability metrics.

For units presented in this report, we relied on generic conversion factors from the American Physical Society and the U.S. Energy Information Administration.

302-3: Energy intensity

We calculate energy intensity by floor space, revenue and headcount. Our three-year trend shows significant efficiency gains. Note that the chart below used normalized values for floor space and revenue for the purpose of presenting combined results.



	2016	2017	2018
Total energy use (MWh)	314,038.10	255,351.87	251,974.20
Floor space (ft²)	21,352,497	20,199,893	23,298,530
Intensity (MWh/ft ²)	0.0147	0.0126	0.0108
Change from baseline	-	-14.05%	-26.47%
Revenue	USD 41.9B	USD 46.6B	USD 50.4B
Intensity (MWh/USD)	0.0000075	0.0000055	0.0000050
Change from baseline	-	-26.88%	-33.30%
Headcount	30,821	33,612	34,988
Intensity (MWh/FTE)	10.19	7.60	7.20
Change from baseline	-	-25.44%	-29.32%

All energy types consumed within our organization are included in calculations of intensity values.

302-4: Reduction of energy consumption

Few sites reported their energy reduction initiatives in 2018, so data presented here is likely understated. Between four projects, we documented annual energy reduction of nearly 3.9 million megajoules (~1.1 million kilowatt hours).

Project type	Description	Region	Reduction/yr.	Unit
Energy efficiency: building services (e.g., lighting, cooling, motors)	Warehouse Lighting Upgrade	NA	720,945	kWh
Energy efficiency: building services (e.g., lighting, cooling, motors)	Warehouse Lighting Upgrade	NA	183,011	kWh
Equipment	Efficient forklift chargers	NA	114,522	kWh
Equipment	Efficient forklift chargers	NA	58,870	kWh

Reductions per year were modeled by the vendor, using baseline consumption data of existing technologies.

2018 contribution to SDGs

Our increase in renewable energy use is a significant improvement compared to our performance in prior years, but at under 10 percent of total electricity use and absent a sufficiently aggressive target, we don't consider the increase to be substantial in the context of the 1.5°C global goal. Our absolute energy has remained relatively stable. However, we've become significantly more efficient in the way we use energy.

SDG 7	Target	No significant progress	Some progress	Significant progress
7.2	By 2030, increase substantially the share of renewable energy in the global energy mix.	✓		
7.3	By 2030, double the global rate of improvement in energy efficiency.		✓	

Water

GRI 103: Management Approach 2016

103-1: Explanation of the material topic and its boundary

Water isn't a material issue for us based on our latest materiality assessment, but we expect that water scarcity in some regions will eventually have an impact on our upstream supply chain. Although our water use is limited to employee consumption and facility maintenance, our operations could still be impacted in areas where living conditions deteriorate due to poor water availability or quality. Therefore, we'll continue

to report water consumption and monitor water use in operating regions with high water-related risks.

103-2: The management approach and its components

We don't actively manage water use, but many of the buildings we occupy are equipped with water-saving devices. We participated in CDP's supply chain water security reporting process. Our 2018 CDP water score was C (Awareness), aligning with sector and regional averages.

103-3: Evaluation of the management approach

No evaluation methods are in place, aside from year-over-year comparison of water consumption.

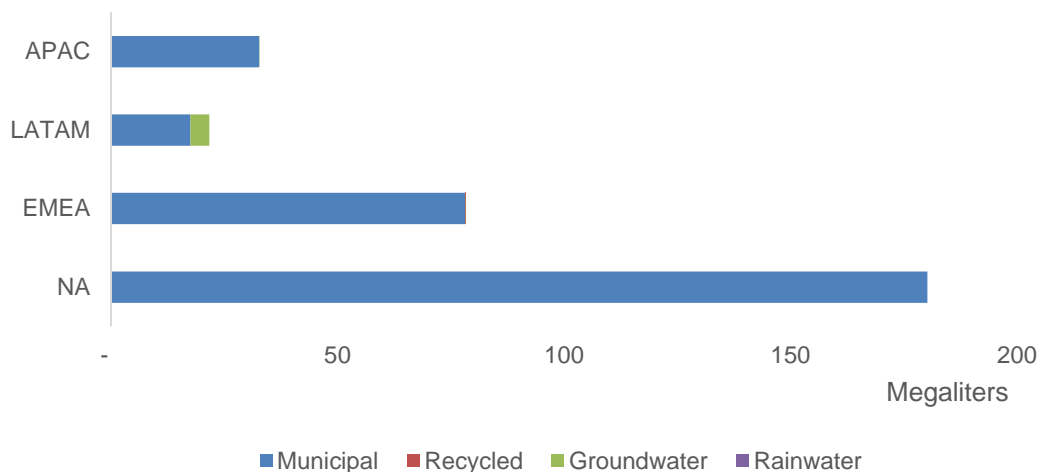
GRI 303: Water 2016

303-1: Water withdrawal by source

Water consumption, as reported by 81 percent of our facilities, amounted to 313 megaliters (82,672,915 gallons). When extrapolated to account for sites that reported no actual or estimated water use, we consumed 388.7 megaliters, a 72 percent increase over 2017. Water intensity per capita rose from approximately 7,000 liters per year to 11,000 liters per year.

Ninety-eight percent of our water use is from municipal or district plants, while 0.01 percent was reportedly recycled water and 1.36 percent groundwater (i.e., well water). We don't withdraw water for industrial purposes or use seawater or third-party water. While we've not performed a recent water risk assessment for our global operations, we're aware of water scarce areas primarily across Asia Pacific, META, in parts of South and Central America, and in California, Nevada, Texas and Arizona within the United States. Facilities in these regions consume nearly 40 percent of reported water purchases.

2018 reported water consumption by region and source



2018 contribution to SDGs

Given the increase in water consumption, including per capita increase, we've not made any progress towards SDG 6.4. We participated in the International Coastal Cleanup in 2018 in support of SDGs 6.6 and 14.2, including local event sponsorship. Volunteer engagement made a noticeable difference in local water ecosystems.

SDG 6	Target	No significant progress	Some progress	Significant progress
6.4	By 2030, substantially increase water-use efficiency across all sectors [...] to address water scarcity and substantially reduce the number of people suffering from water scarcity	✓		
6.6	By 2020, protect and restore water-related ecosystems, including mountains, forests, wetlands, rivers, aquifers and lakes.		✓	

SDG 14	Target	No significant progress	Some progress	Significant progress
14.2	By 2020, sustainably manage and protect marine and coastal ecosystems to avoid significant adverse impacts, including by strengthening their resilience, and take action for their restoration in order to achieve healthy and productive oceans.		✓	

Emissions

GRI 103: Management Approach 2016

103-1: Explanation of the material topic and its boundary

Ingram Micro's operations occupy upward of 1.8 million square meters (20 million square feet) of building space that is heavily reliant on non-renewable energy sources.

An estimated 99 percent of greenhouse gas emissions we generate are caused by direct energy use in our operations, primarily within our buildings. Therefore, we manage energy and emissions under one umbrella, and our emissions reduction targets suffice for measuring progress in both areas. We include all Ingram Micro entities under operational control but haven't assessed whether leased data center space is subject to

inclusion in our emissions inventory. We estimate that less than 1 percent of greenhouse gases we emit originate from cooling equipment, such as HVAC units and chillers under operational control.

Although we've not adequately evaluated scope 3 emissions, they're certain to be far more significant than combined scope 1 and 2 emissions. We contract third parties to transport goods through various modes of transportation, including road, rail, air and sea, and we purchase hundreds of thousands of goods and services each year. Our business travel is significant, but complete air travel data sets are challenging to obtain. We've not begun to model global impacts from employee commuting or calculate emissions from waste. Use and end of life treatment of sold products are also expected to be relevant but haven't been evaluated.

103-2: The management approach and its components

We haven't yet developed an overarching process for the long-term management of climate-related risks and opportunities. In the short and medium term, most climate risks are relatively low and mitigation costs are disproportionately high relative to our profit margins. We therefore focus primarily on compliance, market, technology and customer risks. Market risks from climate change are assessed at least annually. We are invested in the wider adoption of circular economy principles, which drive demand for our product lifecycle services. We're also interested in technology risks and opportunities related to IoT, AI and continued virtualization.

Customer-driven risks are a top priority for us. When our customers can't meet their end-user, regulatory and internal commitments, our business relationships may be affected. Therefore, we frequently evaluate customer needs related to climate action and structure our program priorities accordingly.

Our process for assessing global climate-related risks involves regular review of scientific literature, global environmental, socio-economic and geopolitical trends (e.g., annual risk report of the World Economic Forum, IPCC reports), compliance intelligence, and developments in energy markets. Every three years, we perform a stakeholder engagement process to determine the level of risk perceived by associates, business partners, customers and communities. In addition, we periodically assess country-level risks from climate change. We also participate in sustainable business conferences and refer to resources from NGOs to better understand risks and mitigation strategies across various activities. For instance, while we don't operate a fleet, we rely on contract fleet services and therefore benefit from understanding trends in fleet electrification.

Our primary direct impact is related to our building footprint. Although most of our portfolio is leased, we're sometimes involved in construction and renovation activities. We operate numerous certified sustainable buildings or buildings with sustainable

features. In 2018, we were involved in the construction of a BREEAM-certified warehouse in Tilburg, Netherlands. The building is carbon-neutral and received a rating of 85.36 percent.



Our carbon-neutral BREEAM-certified facility in Tilburg, Netherlands. The facility achieved a pollution rating of 100 percent, an energy rating of 96.15 percent, a health and comfort rating of 86.63 percent, a water rating of 87.5 percent and a waste rating of 85.71 percent.

Day-to-day responsibilities for all aspects of emissions management rest with the senior manager of corporate social responsibility. This role reports to the senior vice president of global operations and engineering, who in turn reports to our CEO. There is no board-level oversight of the CSR program and no dedicated executive role, but we evaluate the structure and effectiveness of our CSR organization annually. The senior CSR manager provides periodic program updates to a seven-member, cross-functional executive leadership committee. For climate-related issues specifically, the CSR manager's responsibilities include:

- Global risk assessments
- Administering the information management system
- Data collection strategy and procedures
- Employee training and support
- Data analysis and validation
- Preparing emissions inventories
- Setting targets
- Monitoring and reporting
- Stakeholder engagement
- Supplier assessments
- Responding to customer inquiries regarding climate action.

103-3: Evaluation of the management approach

We evaluate our performance and targets each year and make revisions as needed. We recognize that our current target of 2.5 percent emissions reduction per year over four years does not yet align with expert recommendations. However, when we launched our global CSR program in 2016, we had to focus on the development and implementation of systems and processes and couldn't allocate adequate time to emissions reduction activities. Now that we've established the program foundation, we'll reassess our goals.

We evaluate progress against our targets, including absolute emissions reduction targets and intensity targets. In addition, we track our CDP scores and assess feedback from customers. Our periodic multi-stakeholder engagement process and our annual climate change risk assessments inform future projects and activities.

Each year, we calculate whether we're within the estimation threshold for external assurance of our emissions inventory. Periodically, we assess if perceived climate change risk among our employees aligns with actual risk.

External recognition indicates progress as well. In 2018, our former ANOVO France locations, now Ingram Services SAS, received the BEGES award for Carbon Inventory of the year in the mid-sized company category from the National Environmental Agency (ADEME).

GRI 305: Emissions 2016

305-1: Direct (Scope 1) GHG emissions

We're able to break down our scope 1 emissions by applicable greenhouse gases, geographic region and business activity. Facility-specific emissions are also available and can be accessed through our annual CDP report, which is publicly available from the CDP company database.

Greenhouse gas	Scope 1 emissions (metric tons of CO ₂ e)	GWP Reference
CO ₂	19,372.76	IPCC Fifth Assessment Report (AR5 – 100 year)
CH ₄	0.54	IPCC Fifth Assessment Report (AR5 – 100 year)
N ₂ O	3.57	IPCC Fifth Assessment Report (AR5 – 100 year)
HFCs	550	ASHRAE Standard 34
CO₂e	19,926.87	

Ingram Micro does not generate biogenic CO₂ emissions.

Country/Region	Scope 1 emissions (metric tons CO ₂ e)
Europe, Middle East and Africa (EMEA)	8,414.59
Asia Pacific (APAC)	169.52
North America (NA)	11,264.66
Latin America (LATAM)	78.11

Activity	Scope 1 emissions (metric tons CO ₂ e)
Administrative	3,109
Repair and processing (Some repair activities occur in warehouses and can't be tracked separately. These are excluded from this figure and included in warehousing.)	1,855
Warehousing	14,413
HVAC	550

Scope 1 CO₂e emissions (MT)



We developed our first global emissions inventory in 2016 for full-year 2015, but the manual data collection process we deployed at the time resulted in a high margin of error. After four consecutive years of global data collection, three of them with the help of an information management system, we've revised our base year from 2015 to 2016. While attempting to correct our 2015 inventory was a possibility, tracking data for dozens of facilities that have since been closed would have been challenging.

We consider the quality of data for scope 1 emissions sources to be low and suspect incomplete reporting of fuels used in operations. Because fuel use is highly variable from one facility to the next, we're unable to extrapolate for non-reporting sites. We apply the simplified estimation method to periodically calculate refrigerant emissions from HVAC and chiller equipment over which we have control. In 2018, these emissions comprised less than 3 percent of total scope 1 emissions and less than 1 percent of combined scope 1 and 2 emissions. We exclude R-22 from our refrigerant inventory in line with its phase-out under the Montreal Protocol.

Our consolidation approach (operational control) excludes emissions generated by third-party facilities where we may lease space, but have no control over building services, equipment or total headcount.

Our consolidation approach is operational control. This excludes emissions generated by third-party facilities where we may lease space, but have no control over building services, equipment or total headcount.

Our emissions factors are primarily obtained from the EPA Climate Leaders database. We follow the Greenhouse Gas Protocol, Corporate Standard, and use supporting sources, including The Climate Registry's General Reporting Protocol.

Fuel type	Emissions factor	Unit	Source
Mobile diesel fuel	10.21	kg CO ₂ e/gallon	EPA, 2015
Stationary diesel Fuel	10.19	kg CO ₂ e/gallon	DEFRA, 2018
Gasoline	9.03	kg CO ₂ e/gallon	EPA, 2015
Propane	5.74	kg CO ₂ e/gallon	EPA, 2015
Natural gas	53.11	kg CO ₂ e/MMBTU	EPA, 2015

305-2: Energy indirect (Scope 2) GHG emissions

We're able to break down our scope 2 emissions by geographic region and business activity. Facility-specific emissions are also available and can be accessed through our annual CDP report, which is publicly available from the CDP company database. Some of our facilities purchase market-based energy, but we've not yet obtained supplier-specific emissions factors to calculate market-based emissions.

Greenhouse gases included in our calculations are carbon dioxide, nitrous oxide and methane. See disclosure 305-1 for information about our base year, consolidation approach, GWP factors and standards we use to prepare our emissions inventory.

Country/Region	Scope 2, location-based (metric tons CO ₂ e)	Scope 2, market-based (metric tons CO ₂ e)	Purchased and consumed electricity, heat, steam or cooling (MWh)	Purchased and consumed low-carbon electricity, heat, steam or cooling accounted in market-based approach (MWh)
EMEA	17,980.67	0	2,744	0
APAC	10,134.54	0	0	0
NA	27,172.49	0	0	0
LATAM	1,332.9	0	0	0

Activity	Scope 2, location-based emissions (metric tons CO ₂ e)	Scope 2, market-based emissions (metric tons CO ₂ e)
Administrative	9,987	0
Repair and processing (Some repair activities occur in warehouses and can't be tracked separately. These are excluded from this figure and included in warehousing.)	3,497	0
Warehousing	43,136	0

Scope 2 CO₂e emissions (MT)



We obtain emissions factors for scope 2 energy categories from multiple sources.

Energy type	Source
Electricity	EPA, 2016; IEA, 2018
Purchased heat	DEFRA, 2018
Purchased steam	DEFRA, 2018

305-3: Other indirect (Scope 3) GHG emissions

We currently calculate partial greenhouse gas emissions from air travel. We use a third-party travel services provider to manage flight tracking, but they've not integrated all countries to date. The data team attempted to collect air travel data from other countries as well, but not everyone responded. We don't know what percentage of air travel is covered by the emissions value provided, as we have no information for several countries. Where available, air travel was categorized by distance and cabin and multiplied by the appropriate GHGP or DEFRA factor (including radiative forcing). We applied an average DEFRA (Air Passenger Distance - Domestic - Average Class (Radiative Forcing)) factor to countries that provided supplemental data for which categorization by distance and cabin was not available.

To calculate electricity transmission and distribution losses, we used the GHGP average data method (world), using a World Bank 2014 figure of 8.251 percent.

Our total calculated scope 3 emissions value is 22,602 MT CO₂e, which represents a small fraction of our scope 3 emissions impact.

Category	Evaluation status	MT CO ₂ e	Percentage of data from suppliers	Explanation
Business travel	Relevant, partially calculated	17,930	100	The reported percentage includes emissions data provided directly by third-party travel services providers and emissions calculated from mileage that was also provided by external providers.
Fuel-and-energy-related activities (not included in Scope 1 or 2)	Relevant, calculated	4,672	0	This value reflects electricity transmission and distribution losses. We did not obtain loss data directly from power suppliers.

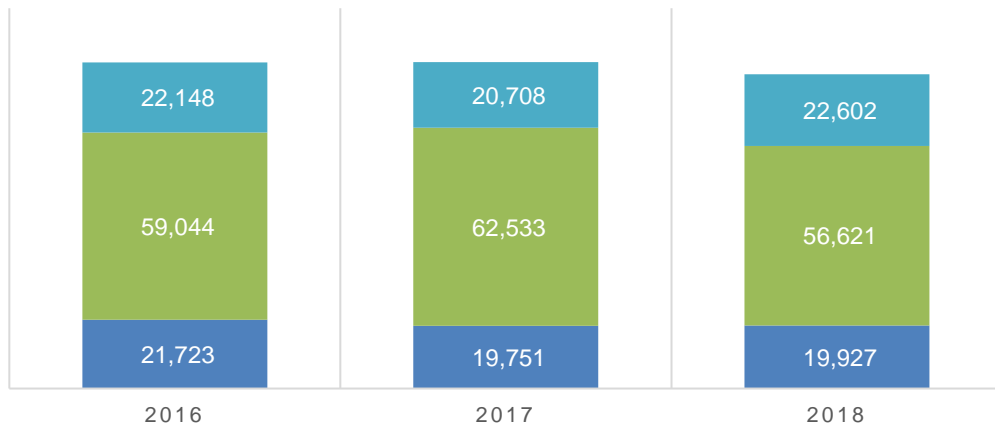
Greenhouse gases included in air travel are carbon dioxide and nitrous oxide. Additionally, T&D losses include emissions from methane. See disclosure 305-1 for information about our base year, consolidation approach, GWP factors, and standards we use to prepare our emissions inventory.

Calculated scope 3 emissions (MT CO2e)



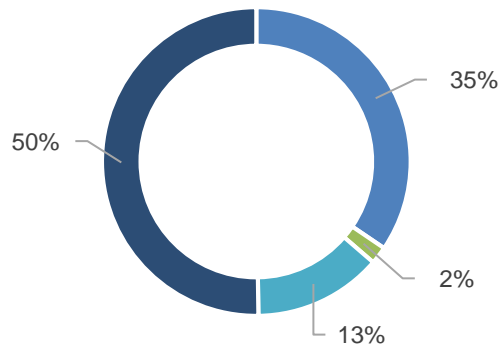
Three-year summary of scope 1, 2 and 3 emissions (MT CO2e)

■ Scope 1 emissions ■ Scope 2 emissions ■ Scope 3 emissions

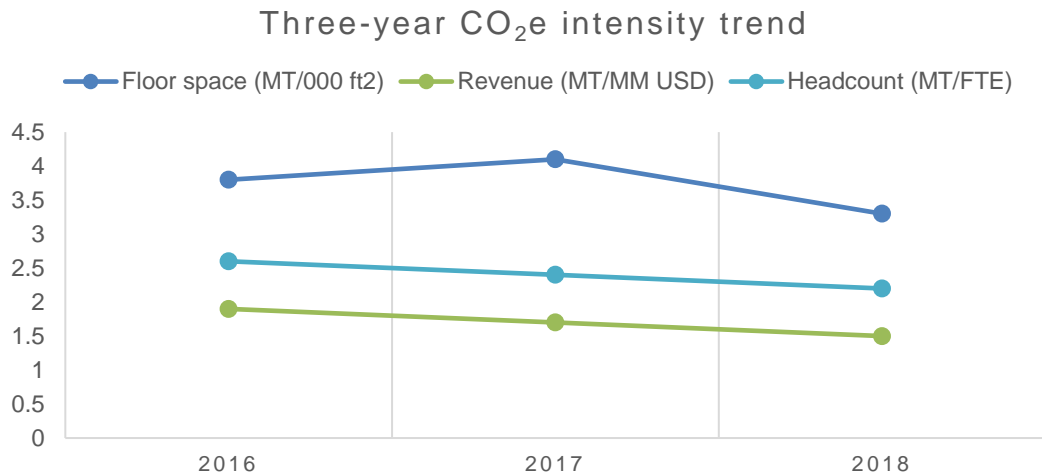


2018 Greenhouse gas emissions distribution by region

■ EMEA ■ LATAM ■ APAC ■ NA



305-4: GHG emissions intensity



Greenhouse gases included in our figures are carbon dioxide, nitrous oxide, methane and hydrofluorocarbons.

	2016	2017	2018
Scope 1 and 2 emissions	80,767	82,285	76,547
Floor space (ft²)	21,352,497	20,199,893	23,298,530
Intensity (MT CO ₂ e/ft ²)	0.0038	0.0041	0.0033
Change from baseline	-	7.69%	-19.34%
Revenue	USD 41.9B	USD 46.6B	USD 50.4B
Intensity (MT CO ₂ e/000 USD)	0.0019	0.0017	0.0015
Change from baseline	-	-10.61%	-11.83%
Headcount	30,821	33,612	34,988
Intensity (MT CO ₂ e/FTE)	2.62	2.45	2.19
Change from baseline	-	-6.58%	-10.63%

305-5: Reduction of GHG emissions

In the U.S. alone, we invested nearly USD 1 million into energy efficiency projects, such as LED lighting upgrades and efficient forklift chargers. The estimated combined emissions reduction from these projects is 759 metric tons of CO₂e per year with an average payback period of 2.74 years. While it's highly likely that additional sites completed efficiency projects during the reporting year, we were unable to obtain supporting data.

Project type	Description	Region	Est. reduction/yr.	Unit
Energy efficiency: building services (e.g., lighting, cooling, motors)	Warehouse Lighting Upgrade	NA	508	MT CO ₂ e
Energy efficiency: building services (e.g., lighting, cooling, motors)	Warehouse Lighting Upgrade	NA	129	MT CO ₂ e
Equipment	Efficient fork lift chargers	NA	81	MT CO ₂ e
Equipment	Efficient fork lift chargers	NA	41	MT CO ₂ e



Didier Moiroud, QHSE Director at Ingram Micro Services SAS, speaks at the *1 an du Plan Climat* summit during acceptance of the BEGES Trophy.

2018 contribution to SDGs

While we've integrated aspects of climate action into policies, we've made only small, incremental improvements. Training we administered in 2018 was limited to environmental data management for employees engaged in data reporting.

SDG 9	Target	No significant progress	Some progress	Significant progress
9.4	By 2030, upgrade infrastructure and retrofit industries to make them sustainable, with increased resource-use efficiency and greater adoption of clean and environmentally sound technologies and industrial processes [...].	✓		

SDG 13	Target	No significant progress	Some progress	Significant progress
13.1	Strengthen resilience and adaptive capacity to climate-related hazards and natural disasters [...].	✓		
13.2	Integrate climate change measures into [...] policies, strategies and planning.	✓		
13.3	Improve education, awareness-raising and human [...] capacity on climate change mitigation, adaptation, impact reduction and early warning.	✓		

Effluents and Waste

GRI 103: Management Approach 2016

103-1: Explanation of the material topic and its Boundary

In 2016, stakeholders deemed waste generation to be a material aspect of our operations. We're tracking and reporting hazardous and nonhazardous waste generated by our warehouses and administrative facilities in all operating regions. We're not involved in the management of effluents. Our operational waste streams include paper; packaging, including film, pallets, void fill and mixed material shipping envelopes; scrap metal; plastics; kitchen waste; construction materials; electronic waste; batteries; lamps; and a relatively small amount of hazardous chemicals, including used oil, spent solvents, residue in non-empty aerosol cans and paint. We also generate waste from the maintenance of our facilities, disposal of furniture and equipment, and company events.

While our non-hazardous waste generation is significant, Ingram Micro isn't a major generator of hazardous waste. Therefore, our efforts are primarily geared toward the reduction of nonhazardous waste.

103-2: The management approach and its components

Our environmental stewardship policy outlines numerous strategies for the minimization of waste at our facilities. Sites with environmental management system certifications may adopt targets that exceed the corporate minimum reduction of 5 percent per year.

We typically work with our service providers to obtain the weight of waste removed and the frequency of removals. Obtaining actual data is challenging for many of the buildings we occupy. Our offices are frequently located in multitenant buildings, where waste

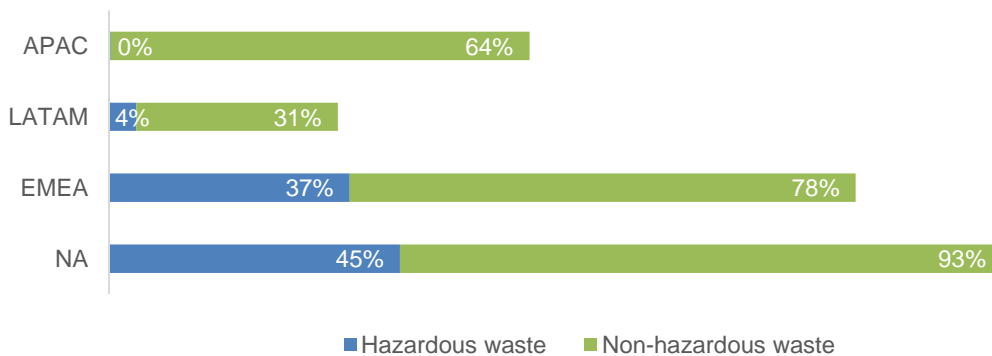
removal is an integrated building service outside of our control. Our metrics reporting procedure lists factors our sites can apply to estimations based on container size, waste composition and number of removals.

Data audits are a standard component of our global data management approach. Each submitted form is reviewed before being merged into the corporate database. In addition, we analyze global data sets for errors as part of our annual reporting process.

103-3: Evaluation of the management approach

We're still focused on improving participation in the data reporting process and we track the percentage of sites reporting. In addition, we measure data quality based on accuracy, completeness and timeliness of submission. Lastly, we evaluate our performance against our annual waste reduction targets and track total waste diversion. In 2018, we diverted 70 percent of our nonhazardous waste stream, excluding waste-to-energy, compared to 76 percent in 2017.

Percentage of facilities reporting waste generation (2018)



2018 nonhazardous waste diversion (MT)



GRI 306: Effluents and Waste 2016

306-2: Waste by type and disposal method

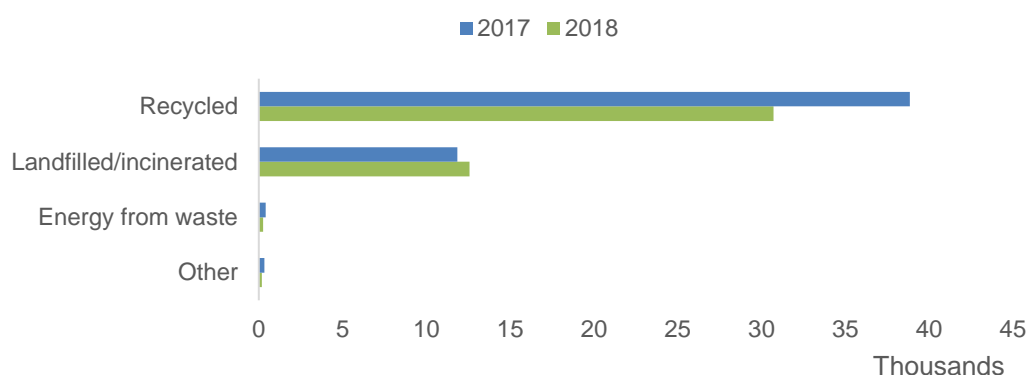
During the reporting year, we generated nearly 44,000 metric tons of nonhazardous waste. In 2017, 76 percent of our global facilities reported nonhazardous waste, compared to 89 percent in 2018. Our reported figures have been extrapolated for sites that did not participate in the reporting process or were unable to obtain data. Due to the low reporting rate for hazardous waste and variability in site operations, extrapolation

and year-over-year comparison is not yet useful. We'll continue to work on increasing our participation rate in the reporting process.

Nonhazardous waste disposal by method (MT)

Disposal Method	2017	2018	YoY change
Landfilled/incinerated	11,847	12,584	6.22%
Recycled	38,850	30,725	-20.92%
Energy from waste	403	263	-34.79%
Other	329	183	-44.34%
Total	51,429	43,755	-14.92%

Non-hazardous waste disposal methods by year (MT)



While our total waste generation decreased by nearly 15 percent in 2018 compared to 2017, our waste-to-landfill generation increased by just over 6 percent. We speculate that this was caused by changes in the recycling commodities market, particularly the 2018 China waste import ban. Therefore, we missed our target to reduce waste-to-landfill by 5 percent. In addition, we abandoned a target we'd set in 2017 to roll out a zero-waste-to-landfill pilot program at 25 sites. Due to insufficient resources and a lack of facilities volunteering for the initiative, we'll revisit this project when the CSR team has additional capacity to manage it.

Our nonhazardous waste intensity declined significantly, 26 percent per unit floor space and 21 percent per unit revenue.

Hazardous waste disposal by method (MT)

Disposal Method	2017 (18%*)	2018 (34%*)
Incinerated	12	5
Other	31	17
Recycled/Reused	84	131
Total	127	153

*Indicates percentage of sites that reported hazardous waste by floor space.

Our waste disposal method is generally determined by information provided by the waste disposal contractor or by organizational defaults.

Through our lifecycle business, we contribute significantly to the reduction of electronic waste by either prolonging the life of assets or ensuring responsible disposal. We analyzed a subset of assets and found that we refurbished approximately 56 percent. The remaining 44 percent were either returned to the commodities market, diverted into a closed-loop manufacturing process or disposed of by an authorized partner. We processed more than 25 million customer assets during the reporting year.

Customer assets refurbished and recycled (MT)



2018 contribution to SDGs

Although we sent more material to the landfill in 2018, our overall waste generation declined significantly. We also saw improvements in global waste reporting. Through our IT asset disposition business, we continue to contribute to the reduction of e-waste. We have yet to develop a company-wide waste management program that addresses environmentally sound lifecycle management and supports site-level waste reduction and zero-waste projects.

SDG 12	Target	No significant progress	Some progress	Significant progress
12.4	By 2020, achieve the environmentally sound management of chemicals and all wastes throughout their life cycle [...].	✓		
12.5	By 2030, substantially reduce waste generation through prevention, reduction, recycling and reuse.		✓	

Environmental Compliance

GRI 103: Management Approach 2016

103-1: Explanation of the material topic and its boundary

Ingram Micro's direct significant environmental impacts arise from energy consumption, waste generation, material use, maintenance, product take-back, repair and recycling, and certain regulated shipping activities. Additionally, we contribute to indirect impacts

from transportation, construction, purchasing and distribution of regulated products. Environmental compliance is relevant to all Ingram Micro entities globally.

103-2: The management approach and its components

Until late 2018, global environmental compliance was managed at the facility level or by a group of facilities under the umbrella of an environmental management system certification. In 2018, our corporate social responsibility department, which began supporting facility compliance in 2016, accepted formal responsibility for global environmental compliance. During the reporting year, we expanded our relationship with a compliance intelligence service to develop compliance profiles, which will facilitate site-level assessments, periodic updates of legal registers and centralized analysis of company-wide environmental compliance.

At least two dozen Ingram Micro sites have developed certified environmental management systems. As we continue to develop the program, we aim to centralize information about the compliance activities of our facilities, including a list of certifications that we can share with our stakeholders in a future report.

103-3: Evaluation of the management approach

While we develop compliance profiles within our centralized system, we're evaluating the number of identified compliance gaps, completeness of legal registers and the number of sites transitioned. Once the foundation is in place, we'll focus on training, communication and internal audits.

GRI 307: Environmental Compliance 2016

307-1: Non-compliance with environmental laws and regulations

During the reporting year, no notices of violation were reported for environmental noncompliance. However, we found that many site-level data reporters either didn't know what to report or where to obtain the information. We plan to develop an online course to provide additional guidance.

Supplier Environmental Assessment

GRI 103: Management Approach 2016

103-1: Explanation of the material topic and its boundary

Ingram Micro operates a deep and diverse supply chain. Our activities include noninventory purchases, such as equipment, supplies, and business services; and inventory purchases, such as technology hardware, accessories and software. We also purchase parts, supplies, software and services related to our repair and recycling business. Because our supply chain activities are not fully centralized, we've not calculated the number of suppliers and original equipment manufacturers we engage with, but we estimate that figure to be around 5,000.

Our supply chain includes partners who operate in risk countries and risk sectors. These include temporary employment agencies, freight services, facility services, construction companies, financial institutions in certain countries, waste management companies and recyclers, janitorial services, and manufacturers in risk countries.

Because social and environmental risks are closely related and often overlap, we manage both aspects under the same program.

103-2: The management approach and its components

During the reporting year, we solidified plans to launch a pilot program with an industry-leading provider of supplier sustainability assessments by mid-2019 and set a target to assess 100 key suppliers by year-end 2019. We'll use the outcome of this initial assessment to shape our management approach going forward. The assessment questionnaires will focus on supplier performance in the areas of environment, labor practices and human rights, fair business and responsible purchasing. While some countries may already require certain suppliers to complete self-assessment questionnaires, there's currently no standardized format that would enable us to use the results for global risk mapping. Corrective action planning and supplier audits only occur within our lifecycle business and only affect a very small number of suppliers.

In 2017, we published a supplier code of ethics based on the code of conduct of the Responsible Business Alliance. The addition of this document to standard supplier agreements has been inconsistent and supplier acceptance has been limited. While we require all suppliers to adhere to applicable laws and regulations in our standard supplier agreement, we have no broadly applicable requirements for social and environmental conduct beyond compliance.

103-3: Evaluation of the management approach

Our initial focus is on meeting our target of completing 100 comprehensive supplier assessments in 2019. We'll share the results in our upcoming report.

GRI 308: Supplier Environmental Assessment 2016

308-1: New suppliers that were screened using environmental criteria

We're not aware of any new suppliers that were screened using environmental criteria during the reporting year.

2018 contribution to SDGs

We have an opportunity to engage our suppliers in the implementation of sustainability programs and encourage reporting of their annual nonfinancial performance.

While there was no significant progress in this area in 2018, we plan to launch a supplier risk assessment pilot program in 2019 to start developing a supplier performance risk matrix and performance baseline.

SDG 12	Target	No significant progress	Some progress	Significant progress
12.6	Encourage companies, especially large and transnational companies, to adopt sustainable practices and to integrate sustainability information into their reporting cycle.	✓		

Social Topics

Employment

GRI 103: Management Approach 2016

103-1: Explanation of the material topic and its boundary

Our nearly 35,000 permanent employees and more than 20,000 contingent workers are the foundation of our success. Our permanent workforce consists of full-time, part-time and contract employees. Our associates primarily work in our offices and warehouses but may also telecommute or work remotely, depending on their role. As a multinational employer, we directly impact employment and labor practices through our policies. We're also indirectly linked to the impacts in our upstream and downstream supply chain, particularly as it relates to sectors and geographies that present labor-related risk.

Employment practices are also relevant in our supply chain and we recognize the opportunity to influence and potentially improve labor conditions beyond our own four walls.

103-2: The management approach and its components

We're constantly evaluating and improving labor practices. Local human resources teams at our facilities across the world ensure compliance with labor laws and address employee needs. In addition to meeting compliance requirements, we've commissioned a series of labor studies in California and New York, including an assessment of our pay practices. At the executive leadership level, we perform regular reviews of the distribution of bonuses, merit increases and other pay incentives by demographics. This enables us to identify and eliminate risk factors for potential inappropriate bias in our pay practices.

HR business partners work closely with functional business units to provide direct and timely support. We recruit prospective employees who possess the skills we require to

move forward in the areas of cloud computing, software development, machine learning and artificial intelligence. Through our *Hire Great!* program, we improve recruiting practices, develop leaders and promote diversity and inclusion.

We periodically solicit feedback from our employees through surveys, employee resource groups, an open-door policy and dialogue with employee representatives. We provide professional development opportunities through training, tuition reimbursement in some locations, 1-1 discussions with managers and a formal annual performance review process. Our leadership team connects with employees through town halls, our “Get to Know Your Global Leadership Team” video series of interviews, and by participating in employee engagement events.

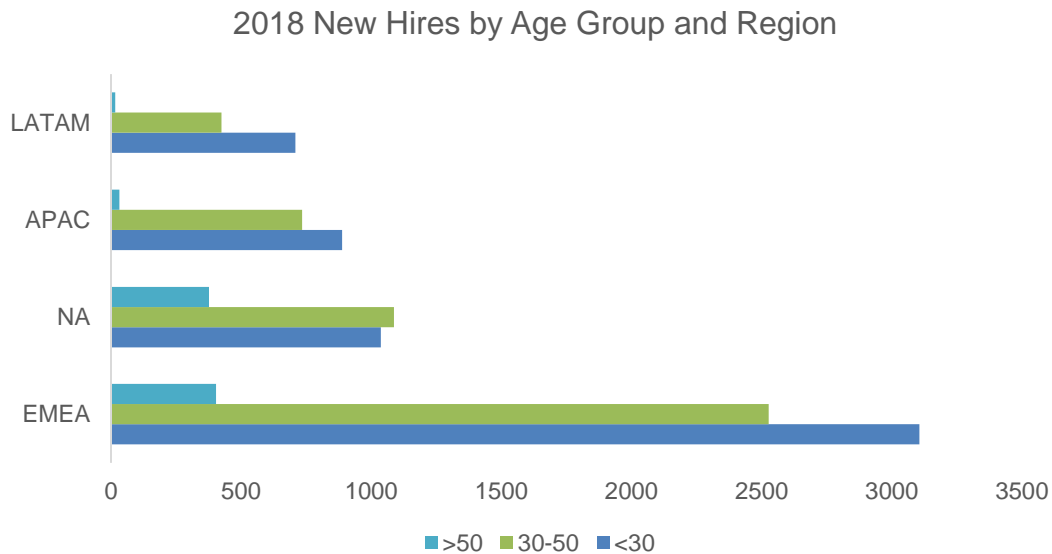
Through contract language, we require that our suppliers follow all laws and regulations. Our planned risk assessment pilot program for key suppliers will include questions about labor practices as well.

103-3: Evaluation of the management approach

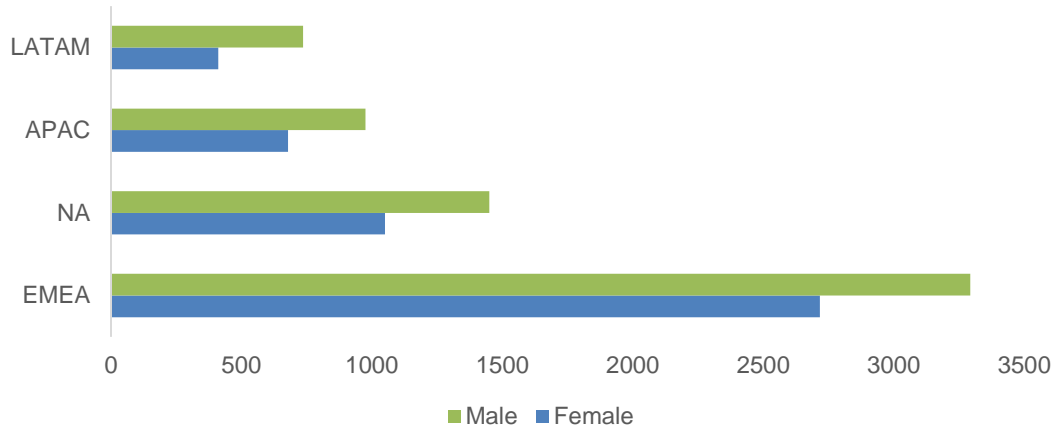
To evaluate our approach, we look to external recognition, stakeholder feedback submitted through surveys, exit interviews, hotline submissions and other channels, as well as retention rates. In 2018, the Ingram Micro Canada team was recognized by *Achievers* as one of North America’s 50 Most Engaged Workplaces. Our operations in Brazil and Mexico were recognized as Best Places to Work.

GRI 401: Employment 2016

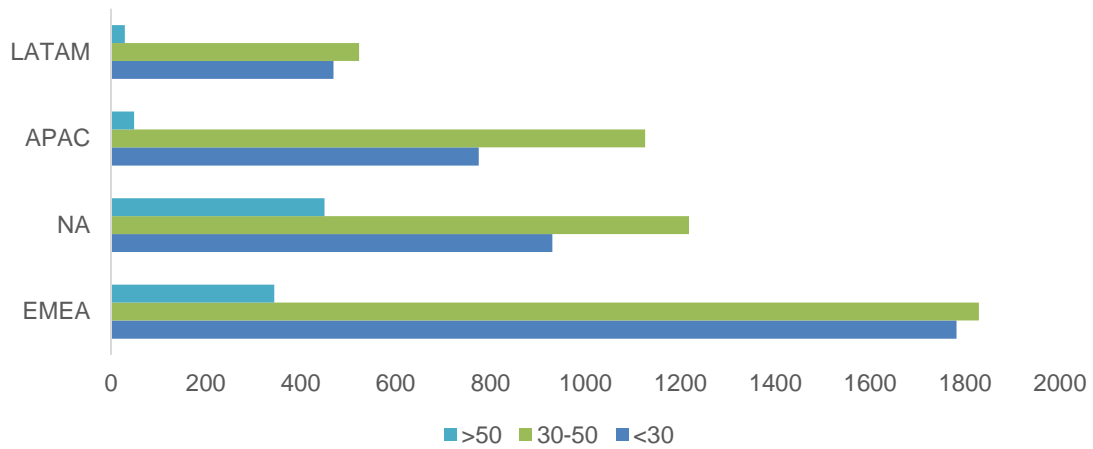
401-1: New employee hires and employee turnover



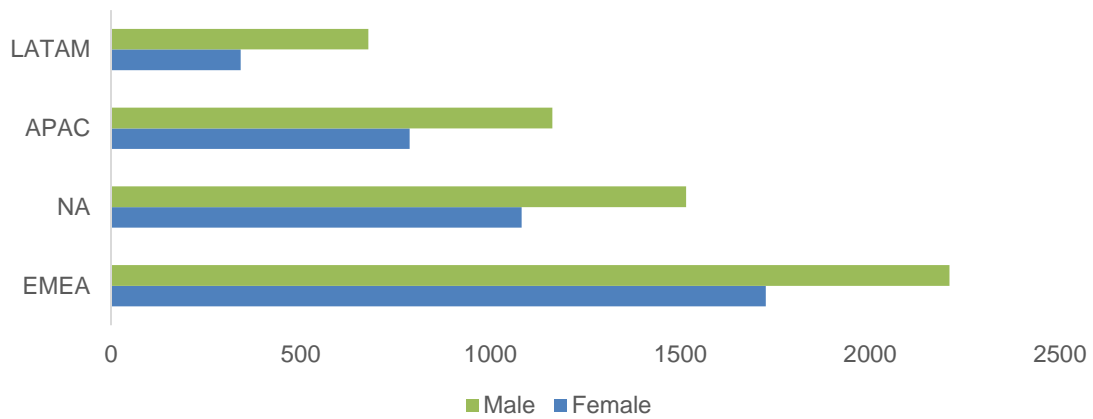
2018 New Hires by Gender and Region



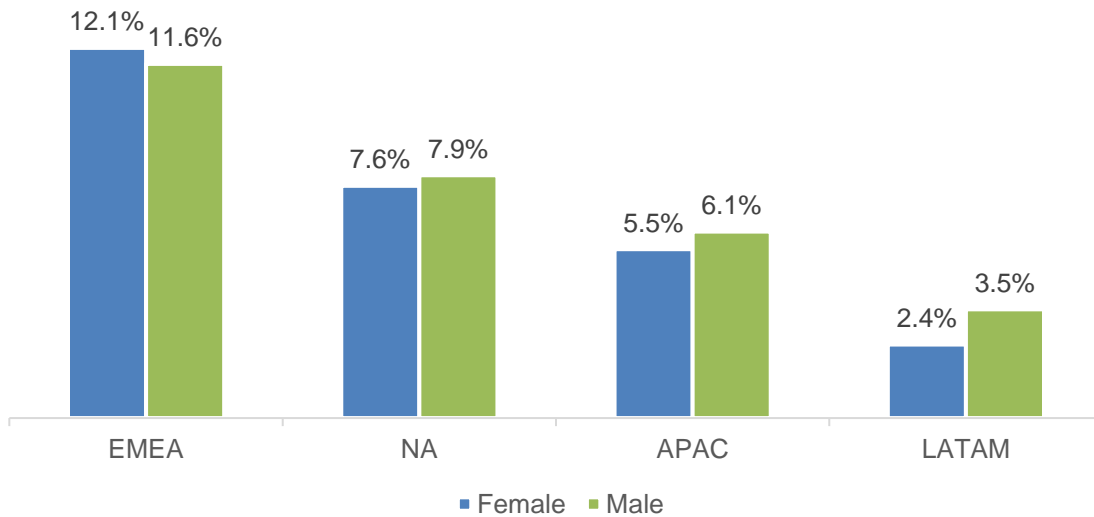
2018 Separations by Age Group and Region



2018 Separations by Gender and Region



2018 Male/Female Separations as Percentage of Male/Female Workforce



Our retention rate for the reporting period was 73 percent, compared to 75 percent in 2017. We’re continuing to invest in programs aimed at reducing turnover and increasing the diversity of our applicant pool.

2018 contribution to SDGs

Our data shows only minor changes in 2018 compared to 2017. We’ll aim to contribute to SDG target 8.5 by seeking solutions to reduce turnover, increase diversity and address the gender pay gap, where applicable.

SDG 8	Target	No significant progress	Some progress	Significant progress
8.5	By 2030, achieve full and productive employment and decent work for all women and men, including for young people and persons with disabilities, and equal pay for work of equal value.	✓		



I AM SAFE day celebration at Ingram Micro Australia

Occupational Health and Safety

GRI 103: Management Approach 2016

103-1: Explanation of the material topic and its boundary

The safety and well-being of our employees and workers is essential to our success. We engage in activities within our offices and warehouses that pose risks to our workforce. Our stakeholders agree and deem occupational safety a material aspect of our operations. Aside from a very small percentage of employees working from home, our safety management system applies to our permanent, contract, temporary and contingent workforce, as well as visitors to our facilities. We further recognize our potential influence on the safety practices of our supply chain partners and plan to conduct a pilot program for supplier risk assessments in 2019. We'll then evaluate potential for influencing supplier labor practices.

Ingram Micro is reporting to the revised *GRI 403: Occupational Health and Safety 2018* guidelines.

103-2: The management approach and its components

Our safety management approach generally combines centralized oversight with site-level accountability. Our global program was only established in 2013 and is still evolving, aiming to reach all global workers by 2023. Safety and security are frequently combined functions and most of our safety managers were internally developed. The program is supported by a comprehensive set of policies, procedures and work instructions and extends to administrative and warehouse facilities. Risk and hazard assessments, audits, incident investigations and corrective action outcomes drive improvement opportunities. The program leverages leading and lagging indicators, including training effectiveness, behavior-based observations and incident rates. Some facilities also proactively track near misses and hazards to prevent injuries.

All Ingram Micro advanced logistics centers and mobility sites across North America and several global sites have implemented the *Safety Star* program, which consists of individualized monthly training by supervisors and team leaders, site-level training effectiveness audits, recording of at least four behavior-based observations per month and one-on-one discussions to address findings, and monthly departmental and site audits.

Other components of occupational health and safety include comprehensive employee benefits and wellness initiatives.

103-3: Evaluation of the management approach

We're continuing to measure the annual expansion of our safety management system (SMS) by number of facilities and floor space. While we operate out of more than 350 facilities, many are small. In 2018, the program was active in 108 facilities (up from 84 in 2017), a 29 percent improvement versus our target of 8.5 percent. We plan to add eight additional facilities in 2019, an increase of 7.4 percent. Covered floor space increased from 15.9 million to 19 million square feet (1.47 million to 1.77 million square meters).

We also track global, regional, national and facility incident rates (IRs) and set targets against our global IR. In 2018, we reduced our IR by 6 percent, exceeding our 5 percent goal for sites included in the SMS. Our 2019 target is a 5 percent reduction compared to 2018. As we're continuing to transition incident reporting to our information management platform, we'll be able to better analyze incident and injury types, as well as potential contributing factors. We'll include limited 2018 information already available in the platform in this report.

GRI 403: Occupational Health and Safety 2018

403-1: Occupational health and safety management system

Ingram Micro implemented a formal safety management system (SMS) on a limited basis in the U.S. in 2011 and decided to implement the program globally in 2013 to meet regulatory requirements and further reduce workplace injuries. All workers whose work or workplace is controlled by Ingram Micro are within the scope of the SMS, including full- and part-time employees; interns, apprentices and other temporary workers; contractors working on-site; and contingent workers. Employees in home offices are

excluded from SMS implementation. All activities are included, including office work, warehouse labor, construction and renovation activities within our control, and driver safety. Our global incident reporting and resolution process follows U.S. OSHA guidelines across the board, ensuring that countries with limited national safety rules meet acceptable standards. In countries with safety standards exceeding OSHA rules, facilities are required to comply with local regulations, including incident reporting to local government agencies in addition to internal reporting. Our SMS was originally designed according to the OHSAS 18001 standard, though only seven facilities have obtained certification. The decision to obtain certification is based on business need.

403-2: Hazard identification, risk assessment, and incident investigation

We apply various risk and hazard identification methods.

- A Job Safety Analysis (JSA) evaluates the steps within each process to identify associated hazards for the purpose of implementing appropriate controls to eliminate or mitigate risk.
- Monthly site-level safety audits by safety managers provide oversight and the opportunity to identify new or previously unknown risks and hazards. These audits are supported by periodic supervisor inspections of their respective areas.
- Our incident reporting and investigation process requires root cause identification, as well as the documentation and resolution of effective corrective actions.
- Our facilities team conducts hazard assessments of activities involving our buildings.
- Local safety staff performs contractor hazard assessments on work to be performed by external parties.

Our safety staff is internally trained to our safety management system to ensure competency. Improvements typically result from the implementation of corrective action plans. Action owners are designated and responsible for resolution by target dates.

Workers report work-related hazards and hazardous situations to designated safety staff, direct supervisors or their HR departments to initiate documentation of the incident and, if applicable, an investigation, including root cause analysis, and corrective action plan. If necessary, HR staff refers injured or ill workers for medical treatment. Our safety and nonretaliation policies protect workers against retaliation for the reporting of incidents. Our code of conduct, which covers all work-related activities, also outlines our anti-retaliation policy and offers instructions for reporting concerns to a third-party hotline. We aim to make worker instructions available in multiple languages and are currently working with facilities to identify gaps caused by language barriers.

We've never had a situation where employees felt it necessary to remove themselves from work tasks due to imminent danger. However, our policy requires reporting of hazards and near misses, so they can be addressed immediately. Employees who remove themselves from work tasks upon identifying an imminent hazard are protected

from retaliation if supervisors failed to remedy the situation right away, the worker acted in good faith, and his or her assessment of potential harm was reasonable.

All our safety-related processes are designed to meet regulatory requirements first and foremost and to adhere closely to the OHSAS 18001/ISO 45001 standard for the continuous improvement of the management system.

403-3: Occupational health services

Injured or ill workers can access off-site occupational health services. When necessary, we arrange transport to local clinics for employees to be evaluated and treated. We adhere to regulations that protect employee medical information, such as those comprising HIPAA in the U.S. and GDPR in the EU.

403-4: Worker participation, consultation, and communication on occupational health and safety

While European Works Councils (EWC) provide opportunity for formal employee participation and consultation, safety committees in other operating regions are informal. Committees are comprised of supervisors and workers and meet monthly. Dialogue is focused on a variety of topics, including injuries and their root causes, corrective actions, audit results, hazard identification and elimination, employee safety concerns, new policies, objectives and procedures, and performance against targets.

403-5: Worker training on occupational health and safety

Training needs are assessed based on job roles and responsibilities and specific tasks (e.g., operation of industrial trucks or material handling). Most training is administered in person by safety staff, though the addition of online training is under consideration. The cost of off-site training (e.g., OSHA courses) is carried by Ingram Micro and training generally takes place during work hours. Training content and frequency for regulated activities follow legal requirements, while SMS training is administered to affected employees once with changes communicated as needed. We make an effort to administer training in languages understood by employees, including use of translators, where necessary. While we're not formally assessing training effectiveness, root cause analysis of incidents typically reveals additional training needs.

403-6: Promotion of worker health

In many of the countries where we operate, our employees have access to universal healthcare and Ingram Micro may supplement this with additional benefits like: life insurance, disability benefits, pension or retirement savings plans as well as paid time off under vacation, holiday and sick time policies. Additionally, in many locations, we promote worker health by offering discounts for fitness center memberships and make available on-site recreational activities. We periodically organize on-site health fairs and organize charity walks and runs. Many of our offices are equipped with ergonomically preferable equipment, including adjustable chairs and sit-stand workstations.

In countries like the U.S., where there is not universal healthcare, we offer comprehensive insurance benefits, including medical, dental and vision care, short-term

and long-term disability, and life insurance benefits in addition to paid time off under vacation, holiday and sick time policies. U.S. employees pay a portion of their monthly insurance premiums and can offset these premiums by participating in wellness activities to receive additional wellness credits. Contingent and temporary workers are excluded from these offerings, while part-time employees receive medical, dental, vision and life insurance benefits. In the U.S., we also offer a 401k plan to full and part-time workers, so they can begin to save towards retirement on their first day of employment. A free employee assistance program provides assessment, referral and intervention assistance for major life events and financial and legal issues to U.S. employees. The program also offers support through difficult challenges such as stress, abuse or addiction.

403-7: Prevention and mitigation of occupational health and safety impacts directly linked by business relationships

We've not yet developed an approach to preventing or mitigating impacts that are directly linked to our operations, products or services by our business relationships. However, we plan to assess an initial set of key suppliers in 2019, including evaluation of their occupational health and safety performance. We will analyze results and determine next steps in late 2019.

403-8: Workers covered by an occupational health and safety management system

Based on the way we tracked the reach of our SMS in 2018, we can only report estimates. We recorded hours worked by permanent and contingent workers who were part of the SMS during the reporting year. If we convert these hours to full-time equivalents (FTE), using a 40-hour work week, at least 23,000 workers were covered. Because work weeks may not add up to 40 hours when including overtime and time off, and because many contingent workers are seasonal hires, this is considered a rough FTE estimate. The SMS covered 19 million square feet (1.77 million square meters) of floor space in 2018. In the Americas, approximately 16 percent of sites by floor space, covering at least 4,000 FTEs were internally audited, while 7 percent by floor space, covering at least 1,800 FTEs, are third-party certified. No audit data is available for other operating regions. Employees working from home are excluded from SMS implementation.

Hours worked are typically tracked in payroll systems. Some sites track data manually and may rely on estimates for reporting total monthly working hours.

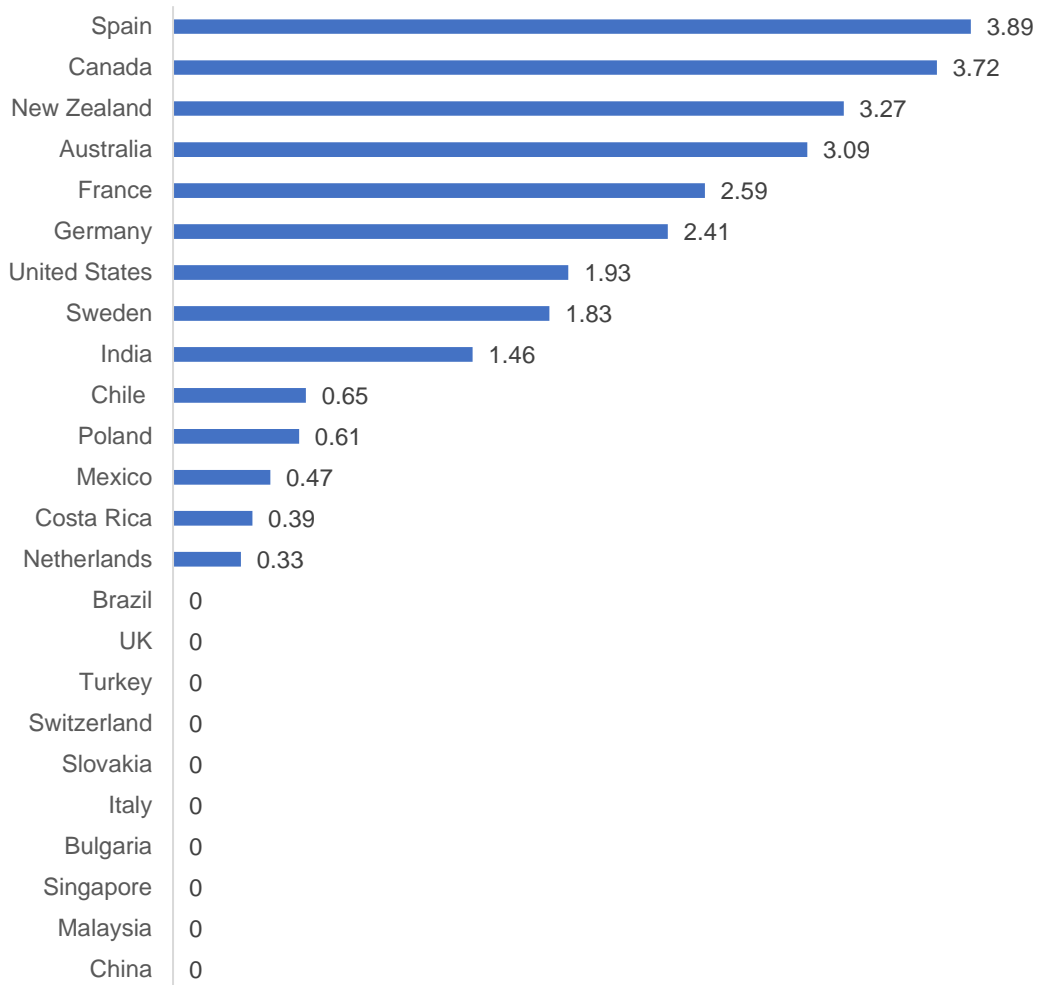
403-9: Work-related injuries

There were no fatalities at Ingram Micro during the reporting year. One high-consequence injury that was not due to repetitive motion inflicted a permanent worker in 2018. While we did not track recovery time for ergonomic injuries, these types of injuries have high potential to exceed the six-month time-frame for full recovery. Due to the gap in tracking recovery periods, we're unable to report an accurate rate for high-consequence injuries.

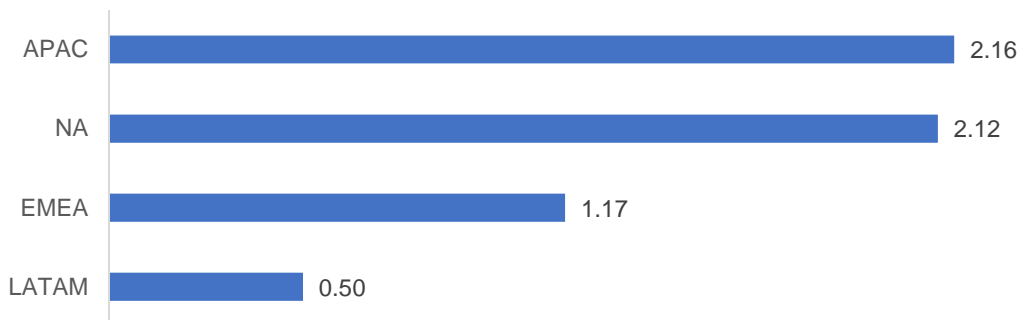
The number of workplace injuries for all employees covered by the SMS during the reporting year was 376 during 48.2 million hours worked, resulting in a global incident

rate of 1.56 (based on 200,000 hours), exceeding our 5 percent reduction target over 2017. Contingent employees worked 15 million hours with 111 injuries, resulting in an incident rate of 1.46 (based on 200,000 hours).

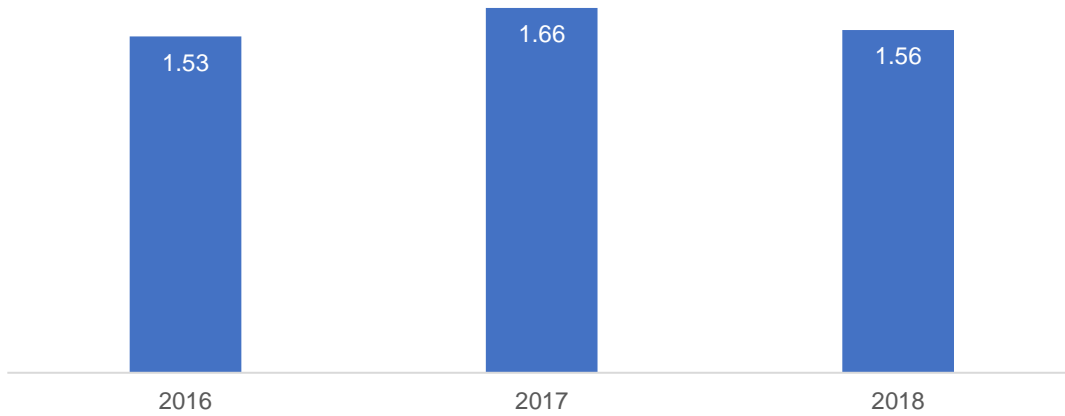
2018 Incident Rates for SMS Countries



2018 Regional Incident Rates

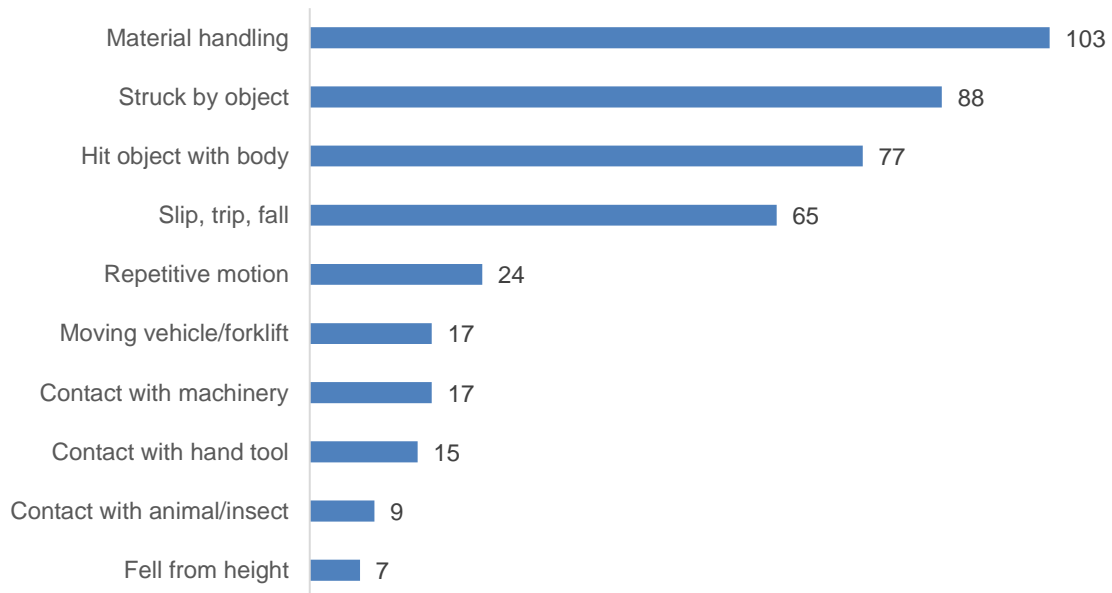


Global Incident Rate

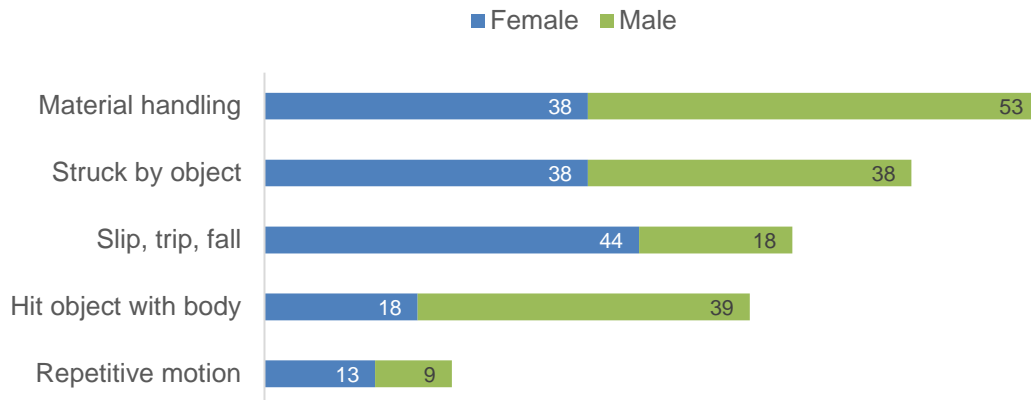


Activities involving repetitive motion, including office work, material handling and the operation of industrial trucks, pose risks for high-consequence injuries. Construction activities and work-related commuting also pose risks, but a far smaller group of workers is exposed to these risks. Hazards are determined by analysis of historical events and the outcomes of formal risk assessments. The operation of an industrial truck caused a high-consequence injury to a non-operator in 2018. As previously mentioned, repetitive motion injuries may also have resulted in long recovery times. These hazards were addressed through retraining.

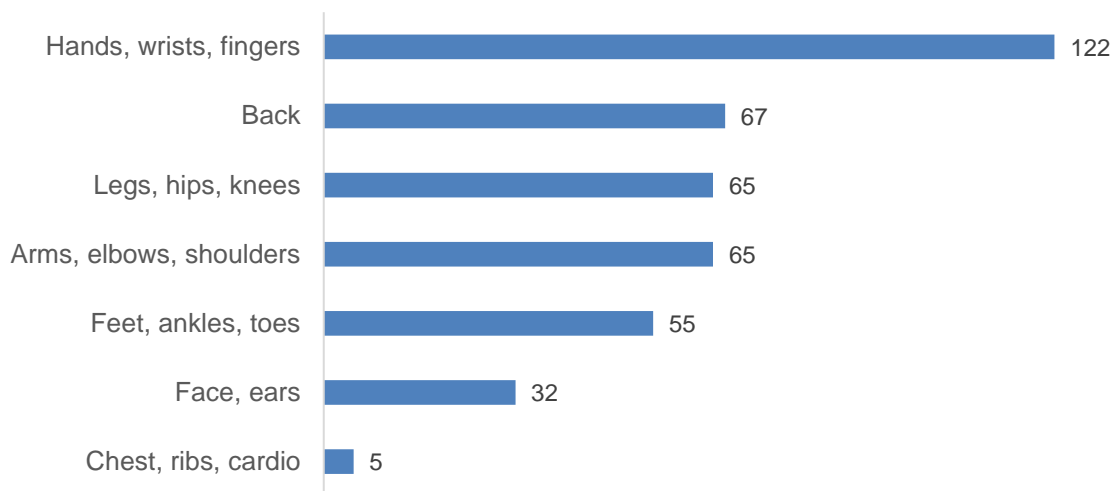
2018 Top Ten Incident Types (Number of occurrences)



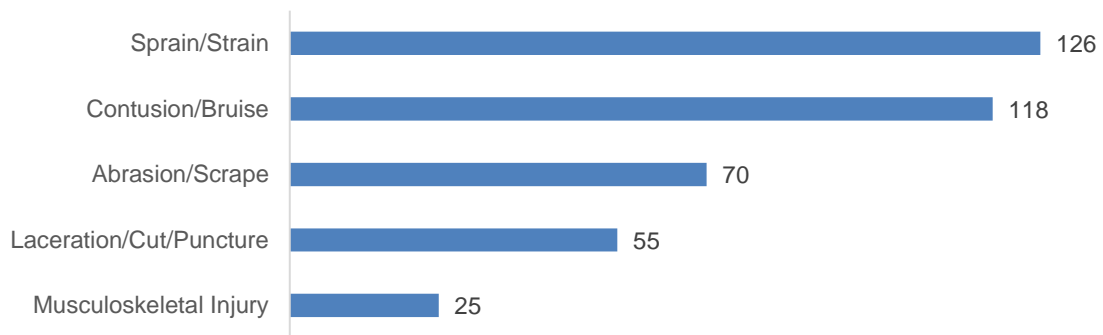
2018 Number of Top 5 Incident Types by Gender



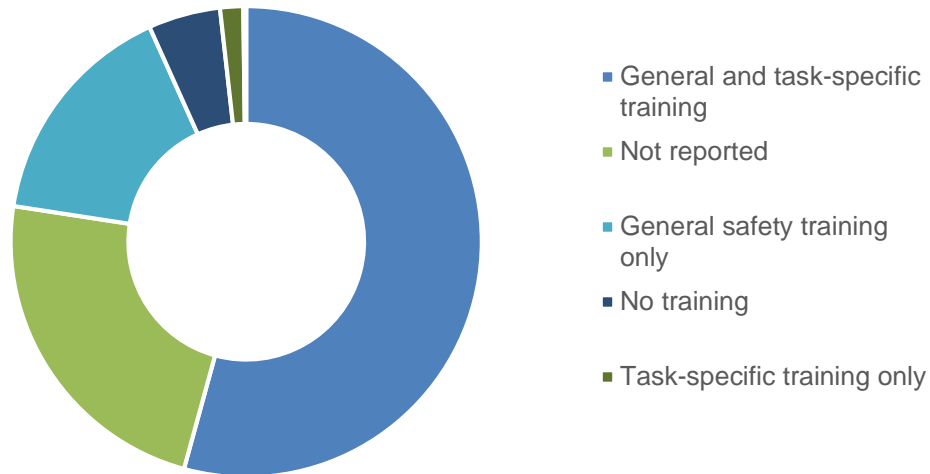
2018 Injured Body Parts (Number of occurrences)



2018 Top 5 Injury Types (Number of occurrences)



Training Status of Injured Workers



Workers at sites that have not yet been integrated into the SMS (including new acquisitions) and home workers are excluded from our reported figures. Most of our 2018 data was tracked manually, as we were transitioning to an information management platform. Charts depicting incident and injury types, body parts and training status contain limited data from incidents reported through our information management portal.

403-10: Work-related ill health

No work-related illnesses were reported in 2018. Since we introduced tracking for sick days in February 2018, about 5,000 sick days have been reported. These were previously included in paid time off. There’s no mechanism in place to determine how many, if any, of these absences were work-related.

2018 contribution to SDGs

We continued to invest in a safe and secure workplace in 2018, but there was no significant change compared to 2017. We have yet to address labor practices in our supply chain. There’s an opportunity to improve safety training and posted instructions in the U.S. for workers who don’t speak or understand English.

SDG 8	Target	No significant progress	Some progress	Significant progress
8.8	Protect labor rights and promote safe and secure working environments for all workers, including migrant workers, in particular women migrants, and those in precarious employment.	✓		

Training and Education

GRI 103: Management Approach 2016

103-1: Explanation of the material topic and its boundary

Training and education are tied to the success of many other functions, including compliance, occupational safety, efficient project management, innovation and numerous others. Training is also essential to the development of our employees in preparation for the internal transition to different or more senior roles. Education promotes a diverse, inclusive and ethical workplace, beginning with the recruiting process. Access to training and education affects associates across our global operations.

103-2: The management approach and its components

Learning and development (L&D) is a corporate function at Ingram Micro. We continue to consult a cohort of L&D professionals to facilitate best practices and approaches to learning, but each country has its own approach based on needs and resources. We've developed and maintain administrative policies for our online learning management system and make all tools available to our countries of operation. For our leadership development track, our corporate L&D team works with our global leadership team to identify individuals for the program.

Our training approach blends different learning styles and needs and offers a range of optional learning opportunities for personal development. Since 2017, we've made an expansive library of courses available via our online learning management system to support general and specific skills development, administer compliance training and promote well-being. In addition, many sites provide in-person training and workshops. For instance, our headquarters location regularly invites senior leaders to conduct a Toastmasters series on public speaking. Various departments provide simultaneous in-person and live-streamed training to introduce products and services. We're also continuing our foreign language development program and have added cultural awareness training.

Other components of our L&D program include tuition reimbursement, performance evaluations, specialized development programs for managers and senior leaders, and our new hire orientation.

103-3: Evaluation of the management approach

We evaluate total and per capita training hours, regional participation, overall participation rates and participation by gender in tuition reimbursement programs, and the rate of performance reviews.



Hack-A-Thon event at Ingram Micro India

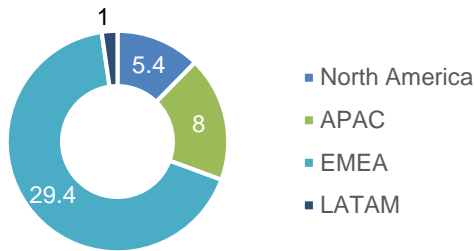
GRI 404: Training and Education 2016

404-1: Average hours of training per year per employee

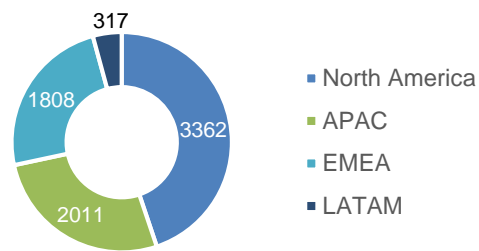
Due to department turnover during the 2018 data aggregation process, only limited data is available for training completions. We normally report on all completed trainings, but only have access to online training enrollments for 2018. This includes course registrations that were incomplete at year-end 2018. Even for this limited data set, a breakdown of training hours by gender and employment category was unavailable. We plan on adequately addressing these indicators again in our 2019 report.

Global online training enrollments in 2018 added up to 137,953 hours, averaging 12.7 hours per employee. Nearly 7,500 employees registered for and completed online training. This comprises 21 percent of our workforce and excludes mandatory training assignments.

2018 Average Per Capita Training Hours for Online Enrollments by Region



2018 Unique Online Training Participants by Region (Completed training only)

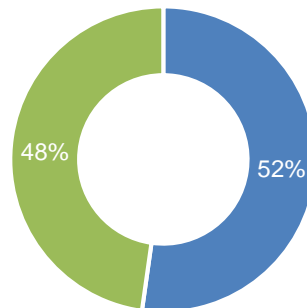


404-2: Programs for upgrading employee skills and transition assistance programs

We offer many training courses designed to develop functional skills, such as software training, project management, organizational skills, public speaking, sales training and general career development, among others. Most of these courses are internal and free of charge. We also cover the cost of external training programs that are relevant to an employee’s job function, such as auditor training, for instance. In addition, we invested nearly USD 200,000 in tuition reimbursements during the reporting year. Tuition reimbursement programs are available wherever the benefit constitutes normal market practice. In 2018, 0.2 percent of all employees received reimbursements for completed courses.

U.S. Tuition Reimbursement Program Participation by Gender

■ Male ■ Female



We also offer financial health training through our investment partners to prepare employees for retirement, as well as outplacement services and guidance for major life changes through our employee assistance program.

404-3: Percentage of employees receiving regular performance and career development reviews

In 2018, 52 percent of our permanent employees received performance evaluations, down from 57 percent in 2017. Breakdowns of the data by gender and employee category are not available due to turnover in our learning and development department during the data aggregation process.

2018 contribution to SDGs

While we encountered data collection challenges in 2018, we made some progress in the area of skills development for our CSR data managers. We increased internal and external communication in the areas of human rights, cultural diversity and equality, but have an opportunity to improve training opportunities that equip associates to promote sustainable development.

SDG 4	Target	No significant progress	Some progress	Significant progress
4.7	By 2030, ensure that all learners acquire the knowledge and skills needed to promote sustainable development [...].	✓		

Diversity and Equal Opportunity

GRI 103: Management Approach 2016

103-1: Explanation of the material topic and its boundary

Our limited 2016 stakeholder engagement process identified diversity and inclusion as a material issue. It remained a priority in 2017 and while we didn't assess stakeholder interest again in 2018, internal engagement on the topic remained significant. Diversity extends to all categories protected under the law, such as gender, gender identity, gender orientation, disability, ethnicity, age, religion, genetic history, veteran status and pregnancy. It also includes gender expression, culture, perspective, experience and many other factors that make us who we are. Inclusion relates to efforts that encourage individuals to be authentic and comfortable sharing their perspectives, and that foster respect, engagement and understanding of our differences.

We encourage diversity and inclusion initiatives globally within our own four walls. Regional programs have been established according to local market practices. Due to our governance model, efforts are implemented at the facility-level and shaped by local interests and available resources.

103-2: The management approach and its components

In 2018, we focused on continuous improvement of our diversity and inclusion efforts. We enhanced our focus on the development of women at Ingram Micro and expanded

our Women's Leadership Forum globally. This commitment is aimed at accelerating the path toward leadership for those with interest, including providing opportunities to develop new skills and helping to identify attractive career paths within our organization. Additionally, we established or further developed various employee resource groups. While employee grassroots efforts continued to drive many of our 2018 initiatives, leadership involvement increased significantly. We brought awareness to and celebrated several diversity and inclusion events, including International Women's Day, World Day for Cultural Diversity and International Day of Peace.

Notably, we participated in McKinsey & Company's Women in the Workplace 2018 study. In partnership with LeanIn.org, the report examines the state of inclusion in North America with a focus on women. We were one of 279 companies sharing information about their talent pipeline and practices. In total, over 64,000 employees shared their assessment of their workplace experiences, with approximately 1,500 of our associates throughout North America participating. Except for the senior manager/director category, we improved representation of women across the board. While our performance exceeded that of our peer group, we didn't meet the "all company" benchmark. Our talent base for women and men of color is not as deep as we'd like it to be, and while we have a strong external candidate pipeline with an exceptional representation of women, the hiring, promoting and development of women offers opportunities for improvement. We earned positive feedback for taking appropriate and decisive action when unacceptable workplace behavior arises.

We also continued our *Manage Great!* program, which requires team managers to complete an expansive curriculum on best practices in management, including the promotion of diversity and inclusion.

Our team in the Philippines was particularly active in the promotion of LGBTQ equality. Our offices in Manila adopted an inclusive restroom policy, sponsored and participated in the Manila Pride parade and engaged with Project Ribbon to support the organization's HIV/AIDS educational and screening programs.

103-3: Evaluation of the management approach

We evaluate our management approach through annual analysis of internal diversity data, including female-to-male new hire ratios, turnover and distribution by employment category. We look at the same factors based on age, evaluate diversity of governing bodies and assess the composition of our U.S. workforce by ethnicity, veteran status and disability, based on voluntary self-disclosure. We also evaluate our pipeline of applicants and consider feedback from employees. We didn't set measurable targets for diversity or equal opportunity to be achieved during the reporting year.

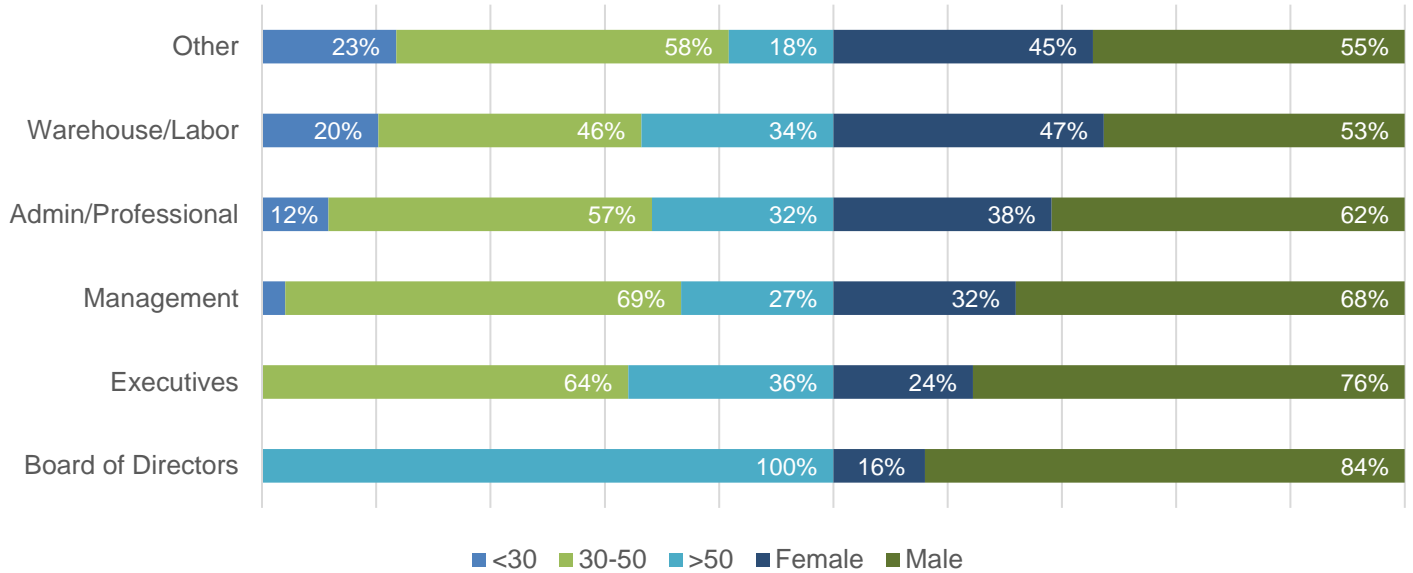
We continue to participate in the Corporate Equality Index of the Human Rights Campaign, which evaluates workplace performance on LGBTQ+ issues. We improved our score by five points in 2018, achieving a rating of 90, our highest score to date. Most

notably, we've improved external engagement. Our latest score aligns closely with the California-based company average of 91.

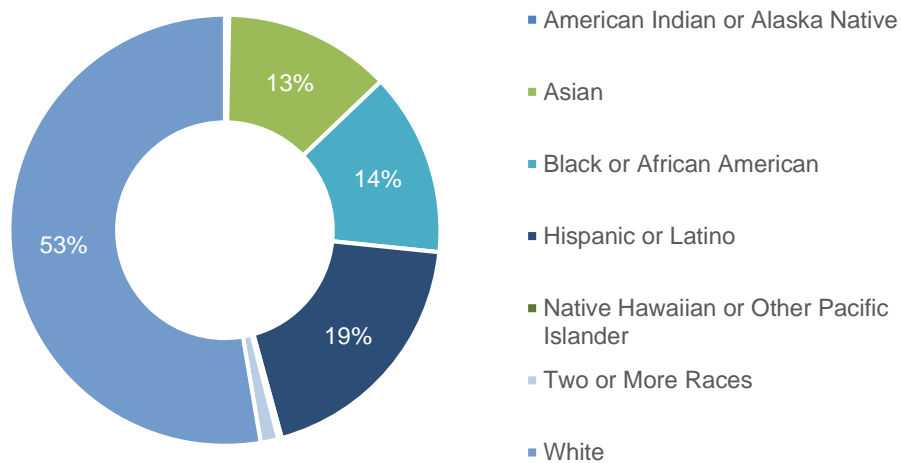
GRI 405: Diversity and Equal Opportunity 2016

405-1: Diversity of governance bodies and employees

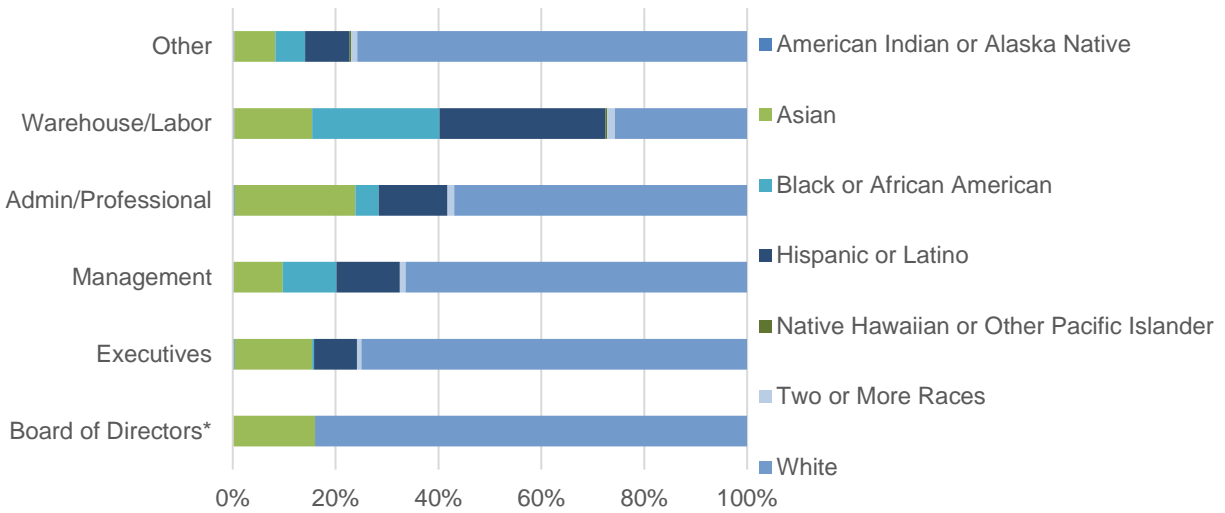
2018 Global Workforce Composition by Age Group and Gender per Employment Category



U.S. Workforce by Ethnicity



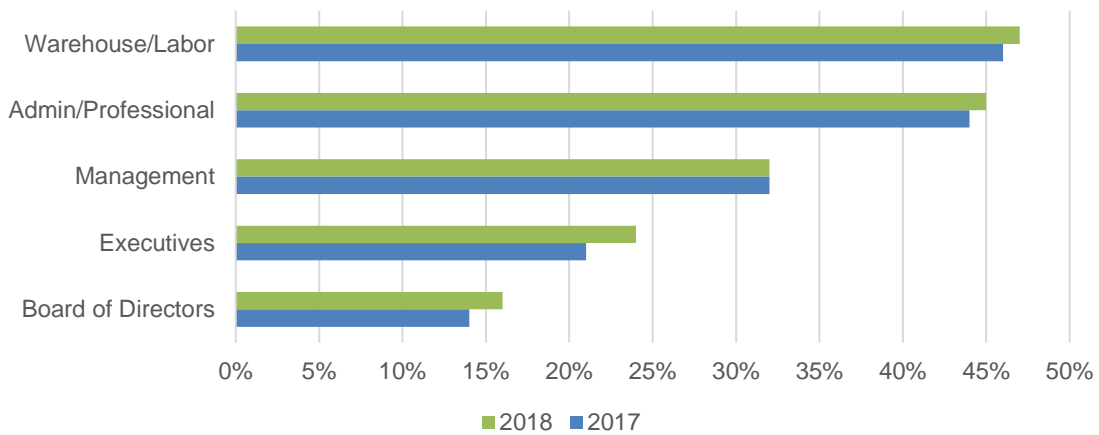
U.S. Workforce Ethnicity by Employment Category



*While the board of directors is included in this chart for informational purposes, members are not exclusively U.S.-based.

Comparable to 2017, the largest segment of our employee population remains in the 30–50 age range across all functions apart from the board of directors. We continue to see a significant gender gap in leadership roles, though we improved by one to three percentage points across all employment categories, except administrative and professional roles, where the ratio remained unchanged. In 2018, male associates held management positions at a ratio of 2:1 and executive positions at a ratio of 3.6:1. We’re continuing to invest in our women’s leadership initiative to reduce this gap.

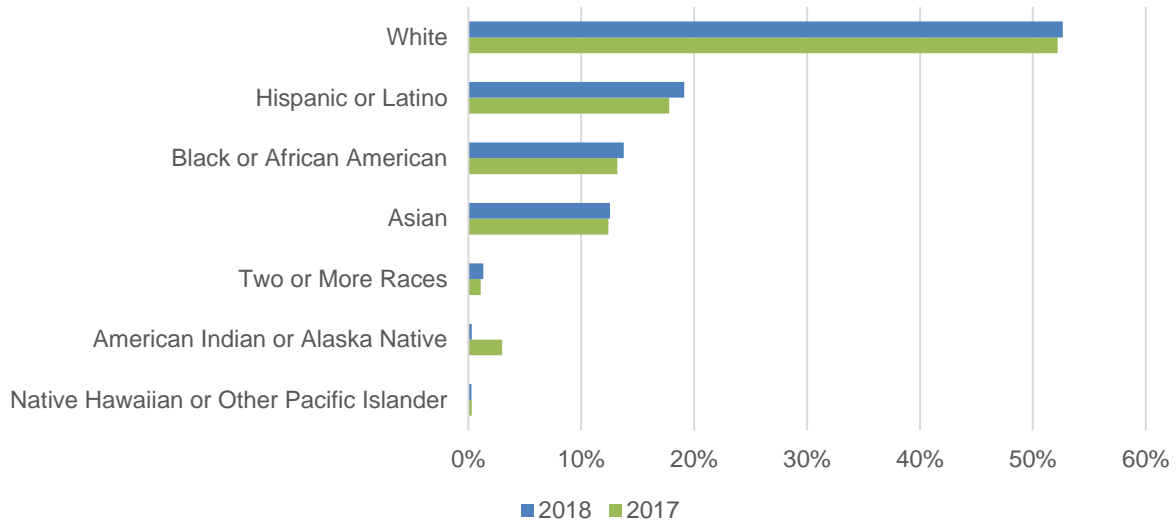
Female Employees by Employment Category (2-year comparison)



U.S. ethnicities remained largely unchanged, though the number of employees self-reporting as American Indian/Alaska Native increased slightly. In 2017, 162 U.S.

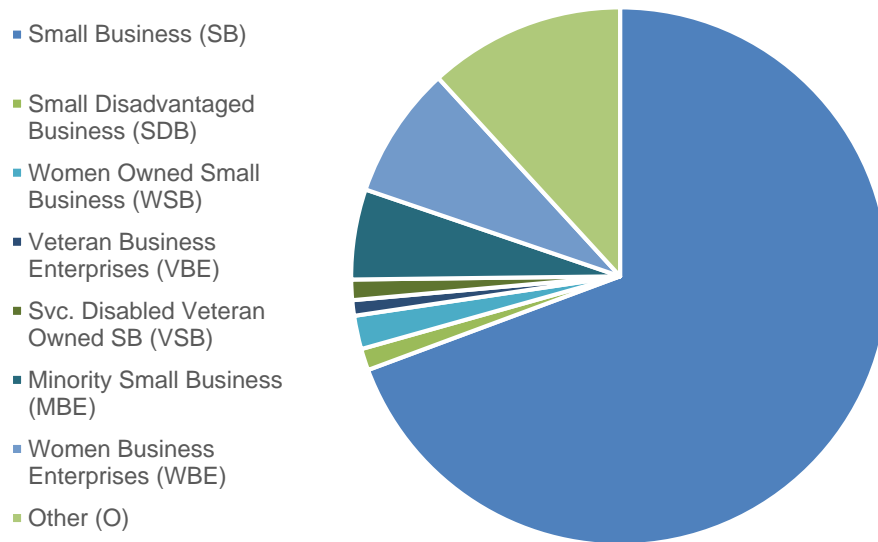
employees identified as veterans, compared to 42 in 2018, a 74 percent decrease. There were 55 U.S. employees who identified as having a disability (now or previously) compared to 59 in 2018, a 7 percent increase.

U.S. Associates by Ethnicity (2-year comparison)



We evaluate our annual spend with diverse vendors in our supply chain. However, vendors voluntarily disclose their status as a small or minority-owned business. In 2018, at least 0.14 percent of our total purchasing budget supported diverse suppliers, primarily small businesses.

2018 Distribution of Diverse Supplier Spend



2018 contribution to SDGs

We have an opportunity to address target 5.1 in our supply chain but have yet to develop a supplier assessment program. Female representation in management roles remained unchanged compared to 2017 and increased slightly at the senior leadership level. We made progress in the area of equality through additional training, communication, increased focus on diversity during the interview process and internal and external engagement. We didn't engage in public policy for equality in 2018 and made no noticeable progress on equality through internal policies.

SDG 5	Target	No significant progress	Some progress	Significant progress
5.1	Eliminate gender-based discrimination	✓		
5.5	Ensure equal representation of women in managerial positions	✓		

SDG 10	Target	No significant progress	Some progress	Significant progress
10.2	Promote the social, economic and political inclusion of all, irrespective of age, sex, disability, race, ethnicity, origin, religion or other status		✓	
10.3	Ensure equal opportunity and reduce inequalities of outcome, including by eliminating discriminatory laws, policies and practices and promoting appropriate legislation, policies and action in this regard.	✓		
10.4	Adopt policies, especially fiscal, wage and social protection policies, and progressively achieve greater equality.	✓		

SDG 16	Target	No significant progress	Some progress	Significant progress
16.7	Ensure responsive, inclusive, participatory and representative decision-making at all levels.	✓		

16.B	Promote and enforce non-discriminatory laws and policies for sustainable development.			
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Child Labor

GRI 103: Management Approach 2016

103-1: Explanation of the material topic and its boundary

Based on the nature of our business and the outcomes of risk assessments, we consider our internal operations to be at low to moderate risk of child labor, depending on operating region. While child labor issues were identified in numerous customer-led RBA and other social audits of our warehouses, we're cognizant of risk factors. Child labor risk is of concern within our supply chain, particularly in high-risk countries and in sectors engaged in manufacturing, janitorial services, loading and unloading of goods, hospitality and some waste recycling activities. Many of our customers are members of the Responsible Business Alliance and as such, expect us to perform human rights due diligence in operations and supply chain, address relevant findings with corrective action plans and implement controls to prevent recurrence. Robust legal frameworks aimed at the eradication of child labor are emerging in several jurisdictions and we're committed to compliance with all laws and regulations.

103-2: The management approach and its components

Our labor and human rights policies prohibit employment of young workers, apart from legitimate intern- and apprenticeships, and instruct employees to report human rights concerns to our employee hotline. Our supplier code of ethics prohibits use of child labor, but we've had limited success implementing the code. We've only completed a small number of supplier risk assessments to date, but we're developing a strategy for expanding this process in 2019. Our global human rights policy is publicly available and applies to employees and business partners. An anonymous hotline is available for reporting violations to our policy. We also publish information about the Global Human Trafficking Hotline.

103-3: Evaluation of the management approach

We currently rely on the outcomes of second-party audits and limited risk screenings to evaluate child labor risk in our own operations. We have yet to implement a process for the evaluation of suppliers.

GRI 408: Child Labor 2016

408-1: Operations and suppliers at significant risk for incidents of child labor

None of our operations in developed regions are at significant risk of using child labor, nor do we expose young workers to hazardous conditions. In developing regions, including Eastern Europe, Latin America, Arab States and Asia Pacific, we operate in countries at risk of child labor per the International Labor Organization. However, we've

not observed any significant risk factors in our direct operations outside of Southeast Asia. While we've not yet assessed our individual suppliers for human rights risk, we have identified high-risk countries in our non-inventory supply chain. Annual spend in these countries comprises approximately 5 percent of total non-inventory spend. We've not yet analyzed spend in risk countries for inventory purchases.

Distribution of non-inventory spend in countries with high human rights risk



We maintain business relationships with suppliers who operate in industries at risk of human rights violations. These include construction, technology, apparel, food, beverage, extractive industries, banks, as well as manufacturing, hospitality and trucking companies in risk countries.

In regions where we've identified risk factors for child labor, we reinforce our human rights and labor policies and evaluate individual violations according to our performance assessment guidelines. We implement corrective actions on a case-by-case basis to resolve risk factors immediately and prevent recurrence of policy violations.

2018 contribution to SDGs

We have an opportunity to address target 8.7 in our supply chain but have yet to develop a supplier assessment program.

SDG 8	Target	No significant progress	Some progress	Significant progress
8.7	[...] by 2025 end child labor in all its forms.	✓		

SDG 16	Target	No significant progress	Some progress	Significant progress
16.2	End abuse, exploitation, trafficking and all forms of violence against and torture of children.	✓		

Forced or Compulsory Labor

GRI 103: Management Approach 2016

103-1: Explanation of the material topic and its boundary

Based on the countries in which we operate and industries with which we engage in our supply chain, there is potential for instances of forced labor. The same risk countries and sectors outlined in disclosure 408 – Child Labor apply to forced labor as well. In addition, construction, electronics manufacturing, mining, hospitality, housekeeping and janitorial services, transportation and warehousing present a high risk for human trafficking.

103-2: The management approach and its components

Our labor and human rights policies prohibit forced labor in all its forms and instruct employees to report human rights concerns to our employee hotline. Our supplier code of ethics prohibits use of indentured servitude, prison labor and otherwise forced labor, but we've had limited success implementing the code. We've only completed a small number of supplier risk assessments to date, but we're developing a strategy for expanding this process in 2019.

103-3: Evaluation of the management approach

We currently rely on the outcomes of second-party audits but plan to adopt a formal process for evaluating our direct and indirect operations.

GRI 409: Forced or Compulsory Labor 2016

409-1: Operations and suppliers at significant risk for incidents of forced or compulsory labor

We've not evaluated risk across all regions where we have direct operations but have observed and addressed risk factors in META. Risk countries in our non-inventory supply chain are identical to those disclosed in 408 – Child Labor. For inventory purchases, China and Malaysia are of highest concern. However, we're aware that no country is immune from modern slavery risk.

2018 contribution to SDGs

We have an opportunity to address target 8.7 in our supply chain but haven't yet launched a supplier assessment program.

SDG 8	Target	No significant progress	Some progress	Significant progress
8.7	Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking [...].			

Supplier Social Assessment

GRI 103: Management Approach 2016

103-1: Explanation of the material topic and its boundary

See disclosure 308 – Supplier Environmental Assessment.

103-2: The management approach and its components

See disclosure 308 – Supplier Environmental Assessment.

103-3: Evaluation of the management approach

See disclosure 308 – Supplier Environmental Assessment.

GRI 414: Supplier Social Assessment 2016

414-1: New suppliers that were screened using social criteria

We're not aware of any new suppliers that were screened using social criteria during the reporting year.

Customer Privacy

GRI 103: Management Approach 2016

103-1: Explanation of the material topic and its boundary

As a technology solutions provider and distributor of more than half a billion products annually, Ingram Micro's physical and digital assets are constantly exposed to potential threats. Cybercrime, theft, aging infrastructure and terrorism all have the potential to impact our business. The security of customer assets and the protection of customer, reseller and vendor privacy continue to be our top priorities.

103-2: The management approach and its components

Ingram Micro's global data protection and privacy program focuses on properly processing the personal data of our employees, customers, resellers and vendors. We've developed several policies to govern the processing of personal data. This includes internal policies and Ingram Micro's externally facing privacy statement available in 27 languages at <https://corp.ingrammicro.com/privacy-statement.aspx>.

We maintain ISO 27001 certification company-wide and follow the Payment Card Industry's Data Security Standard (PCI/DSS). We proactively adopted measures for GDPR compliance, including training, documentation, global policies, business processes for responding to data subject requests, updated legal terms and conditions, and technical solutions that incorporate GDPR requirements. We recognize that many countries and states are adopting laws similar to GDPR. This includes, but is not limited to, California's Consumer Privacy Act ("CCPA") and Brazil's General Data Protection Law ("LGDP"). Our efforts on GDPR compliance have prepared us to effectively manage new regulations as well.

A data privacy officer oversees our privacy program and ensures that we embed privacy by design into our projects. We leverage several leading technology platforms to manage marketing efforts and require opt-in consent from new customers or resellers prior to sending marketing messages. Ingram Micro also respects any opt-out or unsubscribe request. We're self-certified to the EU-U.S. and Swiss-U.S. Privacy Shield to allow the international transfer of personal data of associates, resellers, vendors and customers from the European Union and Switzerland to the United States. Ingram Micro utilizes the European Union's Model Clauses to transfer additional personal data from the European Economic Area to countries outside the European Economic Area and the United States. Please see our Privacy Shield Notice at <https://corp.ingrammicro.com/privacy-shield.aspx> for more information.

103-3: Evaluation of the management approach

Ingram Micro has developed a process for supporting queries and data subject requests from outside parties. Internally, employees can leverage our third-party hotline to report data privacy concerns. Complaints are subject to immediate investigation and any substantiated issues would be addressed through a corrective action process. An internal audit program regularly assesses the effectiveness and suitability of our internal controls for applications and business processes using personal data.

GRI 418: Customer Privacy 2016

418-1: Substantiated complaints concerning breaches of customer privacy and losses of customer data

Complaints received from outside parties and substantiated by the organization	0
Complaints from regulatory bodies	0
What was the total number of identified leaks, thefts, or losses of customer data?	0

Socioeconomic Compliance

GRI 103: Management Approach 2016

103-1: Explanation of the material topic and its boundary

Socioeconomic compliance is generally managed under the same management system we've implemented to ensure ethical business practices. See Disclosure 205 - Anti-Corruption Management Approach.

103-2: The management approach and its components

See Disclosure 205 - Anti-Corruption Management Approach.

103-3: Evaluation of the management approach

See Disclosure 205 - Anti-Corruption Management Approach.

GRI 419: Socioeconomic Compliance 2016

419-1: Non-compliance with laws and regulations in the social and economic area

Aside from the fine described in disclosure 206-1, included in the table below, we've not identified any noncompliance with laws or regulations.

Total monetary value of significant fines	€ 289,000.00
Total number of nonmonetary sanctions	0
Cases brought through dispute resolution mechanisms	0

Custom Topics

Sustainable Development Goals (SDG) Matrix

We track our progress against targets associated with each SDG in the matrix below. SDGs we deem nonapplicable are either unrelated to our direct or indirect business activities or specifically written for the public sector. Targets we've not yet evaluated may relate to our direct or indirect business activities or present a nonprofit partnership opportunity.

SDG 1	1.1	1.2	1.3	1.4	1.5	1.A	1.B											
SDG 2	2.1	2.2	2.3	2.4	2.5	2.A	2.B	2.C										
SDG 3	3.1	3.2	3.3	3.4	3.5	3.6	3.7	3.8	3.9	3.A	3.B	3.C	3.D					
SDG 4	4.1	4.2	4.3	4.4	4.5	4.6	4.7	4.A	4.B	4.C								
SDG 5	5.1	5.2	5.3	5.4	5.5	5.6	5.A	5.B	5.C									
SDG 6	6.1	6.2	6.3	6.4	6.5	6.6	6.A	6.B										
SDG 7	7.1	7.2	7.3	7.A	7.B													
SDG 8	8.1	8.2	8.3	8.4	8.5	8.6	8.7	8.8	8.9	8.10	8.A	8.B						
SDG 9	9.1	9.2	9.3	9.4	9.5	9.A	9.B	9.C										
SDG 10	10.1	10.2	10.3	10.4	10.5	10.6	10.7	10.A	10.B	10.C								
SDG 11	11.1	11.2	11.3	11.4	11.5	11.6	11.7	11.A	11.B	11.C								
SDG 12	12.1	12.2	12.3	12.4	12.5	12.6	12.7	12.8	12.A	12.B	12.C							
SDG 13	13.1	13.2	13.3	13.A	13.B													
SDG 14	14.1	14.2	14.3	14.4	14.5	14.6	14.7	14.A	14.B	14.C								
SDG 15	15.1	15.2	15.3	15.4	15.5	15.6	15.7	15.8	15.9	15.A	15.B	15.C						
SDG 16	16.1	16.2	16.3	16.4	16.5	16.6	16.7	16.8	16.9	16.10	16.A	16.B						
SDG 17	17.1	17.2	17.3	17.4	17.5	17.6	17.7	17.8	17.9	17.10	17.11	17.12	17.13					
	17.14	17.15	17.16	17.17	17.18	17.19												

Not evaluated
Not applicable
No notable progress
Some progress
Significant progress



For questions or comments about this report, please email sustainability@ingrammicro.com.