



Slavery and Human Trafficking Statement

Ingram Micro UK Group

Financial Year 1st January 2023 – 31st December 2023

1. Introduction

Modern slavery and human trafficking are illegal and heinous acts. The Ingram Micro UK Group (as defined in section 2 below) is committed to combating acts of modern slavery and human trafficking within its business and supply chain. Ingram Micro Holdings Limited ("**IMHL**") provides this Slavery and Human Trafficking Statement (the "**Statement**") on behalf of the Ingram Micro UK Group in accordance with Section 54 (1) of the Modern Slavery Act 2015 (the "**Act**") and the respective statutory guidance issued by the UK Home Secretary.

Ingram Micro's tenet of Integrity states: *"We exemplify the highest ethical standards, led by honesty, fairness and dignity in every action we take, everywhere, every time, with everyone."* Just as important is the tenet of Responsibility: *"We say what we do and we do what we say. We are responsible for our individual and team actions, meeting our customer and financial commitments, and recognizing our social, community and environmental responsibilities."* Building upon these and other Ingram Micro's tenets of success and upon long-standing company policies of legal and ethical compliance, the Ingram Micro UK Group is committed to the highest standards of legal and ethical conduct as set out in Ingram Micro's Code of Conduct (available at: <http://www.ingrammicro.com/>).

2. Organisation structure

IMHL is a holding company and does not perform any trading activities. The principal activity of IMHL is the acquisition and ownership of other Ingram Micro group companies in the United Kingdom ("**UK**") and other countries. IMHL and its UK subsidiaries are part of the Ingram Micro company group under the parent company Ingram Micro Inc with its head office in California, USA.

IMHL has two subsidiaries carrying on business in the UK with an annual turnover in excess of £36 million:

- Ingram Micro (UK) Limited ("**IMUK**") ; and
- Ingram Micro Services Limited ("**IMSL**").

In addition, Commscare Group Limited ("**Commscare**") is a direct subsidiary of IMUK. For the purposes of this Statement, IMUK, IMSL and Commscare are altogether referred to as the "**Ingram Micro UK Group**".

All companies in the Ingram Micro UK Group are registered in the UK and have a financial year ending on 31st December.

3. Business of the Ingram Micro UK Group and its supply chains

IMUK is a supplier of information technology products and services operating at wholesale level of trade. IMUK's business is organised into business units responsible for technology products, cloud and services distribution, including distribution of computer hardware and software and cloud-based services (<https://uk.ingrammicro.eu/> and <https://uk-new.ingrammicro.com/cep/app/home>).



IMSL provides services to enable a circular and sustainable product lifecycle for enterprises and technology companies by addressing the return, refurbishment, repair, and remarketing of technology products. The company purchases components, supplies, software, and services from third party suppliers as part of its lifecycle business. (<https://www.ingrammicrolifecycle.com/>).

The principal activity of Commscare is the provision of specialist professional, managed, and maintenance IT services to value-added and other resellers (<https://www.comms-care.com/>).

The Ingram Micro UK Group operates a deep and diverse supply chain to support its businesses. The Ingram Micro UK Group's activities in the UK include purchases from suppliers for internal use, such as equipment, supplies, and business services; purchases of technology hardware/software, accessories, and cloud services from hundreds of local and international technology vendors and original equipment manufacturers (OEMs) for distribution and resale to resellers in the UK and other European countries.

4. Policies in relation to slavery and human trafficking

The Ingram Micro company group is a community dedicated to a shared set of principles that help succeed in its business, support its communities and honour universal principles of human rights. The company group supports the protection of human rights globally – actively in its operations and by exerting influence on its supply chain. Ingram Micro's policies and culture are in alignment with the Universal Declaration of Human Rights, the United Nations (UN) Guiding Principles on Business and Human Rights, the Ten Principles of the UN Global Compact, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and the Responsible Business Alliance Code of Conduct.

The Ingram Micro UK Group has zero tolerance to slavery and human trafficking and supports the total eradication of human rights violations. The Ingram Micro UK Group is committed to comply with the applicable laws and regulations that protect human rights in the regions where it operates and not to do business with companies engaged in the practices prohibited by the Modern Slavery Act. The Ingram Micro UK Group expects the same of its business partners throughout the supply chain.

Globally, Ingram Micro has developed a range of policies that underpin the commitment to ensure that there is no modern slavery or human trafficking in its supply chains or in any part of its business. Ingram Micro company policies reflect the commitment to acting ethically and with integrity in all its business relationships and to implementing and enforcing effective systems and controls to ensure human rights violations are not taking place. The following company policies and practices are in place and relevant to modern slavery, which are continuously reviewed and updated:

- Global Human Rights Policy
(available at: <https://www.ingrammicro.com/en-us/discover/esg/social/human-rights>);
- Supplier Code of Conduct
(available at: <https://www.ingrammicro.com/en-us/discover/esg/social/human-rights>);
- Code of Conduct
(available at: <https://ingrammicro.gcs-web.com/code-of-conduct>).

Furthermore, in its standard distribution agreement IMUK requires its vendors to adhere to ethical trading principles in accordance with international trading standards including the UN Convention on



the Rights of the Child and the Conventions of the ILO (including the Declaration on Fundamental Principles and Rights at Work). The Ingram Micro UK Group expects its vendors to support the principles set out in Ingram Micro's Code of Conduct or the respective vendors' own policies based on generally accepted ethical trading standards when conducting business with the Ingram Micro UK Group. If the Ingram Micro UK Group becomes aware of any breaches of the abovementioned principles, standards and conventions by its vendors or suppliers, this could lead to termination of the respective distribution or supply agreements.

5. Due diligence processes and risk assessment

The Ingram Micro UK Group's internal recruitment is based on policies and procedures that focus on compliance with applicable legislation.


As part of a global initiative to identify and mitigate risks, Ingram Micro has developed policies and procedures to enable employees to raise questions and report any issue of legal and ethical compliance. A specifically designated whistleblowing hotline is created for employees to report their concerns or ask for more information while preserving each caller's anonymity if so desired. Any human rights violations are expected to be reported to this hotline immediately. In addition, Ingram Micro UK Group employees may also contact the Chief Compliance Officer, the Human Resources department, or the Legal department.

6. Training

As part of our efforts to help associates make the right ethical decisions in their day-to-day professional activities, Ingram Micro regularly trains its workforce focused on essential compliance principles. Associates are enrolled into a video-based-training available in multiple languages and in 2023, covered Ingram Micro's Code of Conduct, among others.

This Statement is approved by the board of directors of Ingram Micro Holdings Limited on 24.09.2024.

Ingram Micro Holdings Limited

Signed by:

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Matthew Sanderson

Director