

Environmental Stewardship Policy

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Corporate Social Responsibility

1. PURPOSE

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

2. DEFINITIONS

Business Unit – Any integrated site over which Ingram Micro has financial or operational control.

CDP – Formerly Carbon Disclosure Project. A UK-based non-governmental organization engaged in the collection and scoring of corporate, city and government greenhouse gas data. More than 4,500 organizations globally report to CDP, which is backed by more than \$92 trillion in institutional investor dollars.

CSR - Corporate Social Responsibility

Energy Star – An energy efficiency program administered by the U.S. EPA, offering certification for electric and electronic products, as well as energy efficiency ratings and certification for buildings.

EPA SmartWay – A voluntary fleet efficiency program administered by the U.S. EPA.

EPEAT – Electronic Product Environmental Assessment Tool. Environmental rating system for electronic products administered by the Green Electronics Council.

e-Stewards - An electronics waste recycling standard created by the Basel Action Network.

FSC – Forest Stewardship Council. Independent administrator of a forest certification standard, promoting sustainable forestry.

ISO 14001 – Framework that defines the criteria for a certifiable environmental management system.

R2 - The Responsible Recycling Practices Standard (R2:2013) certification is a set of voluntary principles and guidelines designed to promote and assess responsible practices for electronics recyclers.

SFI – Sustainable Forestry Initiative. Independent administrator of a forest certification standard, promoting sustainable forestry.

Stakeholder – Interested party. Stakeholders include, among others, customers, business partners, employees, executive leaders, regulators, communities, media, investors, non-governmental organizations, academics and product end-users.

3. SCOPE / APPLICABILITY

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

4. POLICY STATEMENT

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

- legal compliance at the local, regional, national and international level,
- minimizing our environmental impact directly where we have control and indirectly where we have influence,
- responsible use of natural resources and focus on pollution prevention,
- continuous improvement in environmental performance across global operations,

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- periodically reporting progress against measurable, context-based targets, employing globally recognized standards and protocols,
- comprehensive stakeholder engagement and
- seeking innovative approaches to advance environmental stewardship globally.

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

5. STRATEGIES

Commitment to environmental compliance is the basic prerequisite for our environmental stewardship program. All employees must observe Ingram Micro values and all laws and regulations at all times. We expect our supply chain partners globally to abide by these same values and employ these same standards. The following eight strategies comprise the focus areas of our environmental stewardship efforts.

1. ENVIRONMENTAL MANAGEMENT SYSTEMS

Each Ingram Micro facility shall

- develop an environmental management system (EMS) in alignment with the ISO 14001 standard,
- pursue EMS certification according to business need, where feasible, and
- support environmental performance management efforts at the corporate level.

2. BUILDING MANAGEMENT

Operation of buildings worldwide constitutes a significant portion of Ingram Micro's direct environmental impact. Accordingly, gaining efficiencies in our facilities, including optimizing processes therein is our priority.

1. Efficient use of Resources

Employees globally shall participate in resource conservation efforts, including the following:

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

2. Construction and Acquisition

- a. Prior to constructing new buildings, consideration shall be given to the following:
 - Alternatives to new construction, such as occupying existing buildings

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- Constructing facilities on brownfields
- Sustainable building design strategies
- Use of sustainable building materials
- LEED or equivalent certification
- Renewable energy options
- Balanced stakeholder engagement as part of the environmental impact assessment

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

- Assessment of building efficiency and environmentally preferable features (e.g. retention ponds, percentage of porous surfaces, walkable communities)
- Assessment of environmental health factors
- Evaluation of property with regard to biodiversity impacts, such as siting on protected lands and provision of habitat for protected species
- Consideration of existing green building certifications
- The ability to obtain energy and water consumption data dating back to Ingram Micro's baseline year (2015) for the measurement of environmental performance

3. Process Design for Sustainability

Process design in Advanced Logistics Centers shall incorporate principles in support of environmental stewardship, including

- equipment efficiency,
- use of rechargeable batteries in industrial trucks,
- space optimization and flexible/modular design strategies,
- equipment preventive maintenance programs,
- maximizing capacity and
- digitally tracking material, where feasible.

3. TRANSPORTATION

1. Distribution Partners

Ingram Micro partners with third party freight transporters for the distribution of products. When choosing vendors, preference shall be given to the following:

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

2. Business Travel

All employees shall reduce business travel when possible by taking the following measures:

- Utilization of communications technologies in lieu of travel
- Combining visits to multiple locations in order to reduce total travel mileage
- Optimizing travel routes
- Employing efficient transportation modes (e.g. rail in place of air travel, where available)
- Carpooling to local business meetings with colleagues whenever possible

3. Employee Commuting

Ingram Micro encourages use of alternative transportation and supports reduction in commuting as a means to reducing environmental impact by offering the following, where lawful and feasible:

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

4. PACKAGING

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

- reuse packaging materials when possible (e.g. pallets in warehouse operations),
- avoid mixed material packaging that cannot be efficiently separated in recycling facilities,
- recycle packaging materials that cannot be reused (e.g. plastic film received in warehouse operations),
- maximize the use of materials with post-consumer recycled content and materials made from renewable resources,
- give preference to materials with recycled content certifications (e.g. SFI, FSC),
- explore viable options for lower-impact void-fill materials,
- adopt technologies that customize packaging size to fit products, and
- promote recycling of packaging by end-users.

5. SUPPLY CHAIN

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

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

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

6. IT EFFICIENCY

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

- Virtualization of IT infrastructure and adoption of cloud-based technologies
- Data Center efficiency
- Power Management
- Sourcing of hardware designed for disassembly and recyclability
- Preference for products with the EPEAT, Energy Star or equivalent label
- Customer education related to IT efficiency

7. ELECTRONIC WASTE MANAGEMENT

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

- reverse logistics solutions, including take-back programs for electronic waste items,
- repairing, repurposing and recycling used electronics,
- e-Stewards and R2 certification,
- toner cartridge, battery and cell phone recycling,
- compliance with all electronic waste collection, handling, storage, disposal and recordkeeping regulations at office buildings and
- customer education related to electronic waste recycling.

8. MEASURING & REPORTING

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

- collect, at minimum, energy and water consumption data for facilities exceeding 5,000 square feet, given the information is reasonably obtainable,
- develop a company-wide greenhouse gas inventory according to a globally recognized protocol,
- quantify global water consumption by region and identify water scarcity hotspots,
- develop context-based targets for emissions reduction,
- develop meaningful targets for water reduction in water-scarce communities,
- identify operations in regions of high biodiversity value,
- report greenhouse gas emissions and related information to CDP,
- report overall environmental performance to our stakeholders in an annual CSR report, following a globally recognized reporting framework.

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6. RESPONSIBILITIES

- a. The CSR Manager is responsible for periodic review of this policy and its effectiveness.
- b. Assigned approvers for this policy are responsible for timely review and approval.
- c. All associates and business units are responsible for implementing this policy as applicable to their facilities and roles.
- d. All Ingram Micro stakeholders are encouraged to provide recommendations for the improvement of our environmental stewardship program.
- e. Facilities globally within the scope outlined in section 8 must designate one or more associate(s) responsible for the tracking and reporting of environmental data.
- f. Training items in support of this policy must be completed by assigned deadlines.
- g. Annual internal requests for site-specific environmental stewardship efforts (e.g. metrics, stories, testimonials and photographs) shall be fulfilled in a timely manner.

7. RELATED DOCUMENTS

- Ingram Micro's Human Rights Policy
- Ingram Micro's Code of Conduct
- Ingram Micro's Supplier Code of Conduct

8. REVISION HISTORY

1. Revised March 6, 2012. Original policy published April 15, 2011. Nature of revision not noted.
2. Revised November 6, 2015 to broaden scope of sustainable business practices. Changed title from Environmental Compliance and Performance to Environmental Stewardship. Removed focus on compliance and EMS in favor of comprehensive, strategic initiatives. Updated responsibilities.

9. EFFECTIVE DATE

Date: January 15, 2015

10. APPROVALS

ON FILE