

INGRAM MICRO SUPPLIER CODE OF CONDUCT

At Ingram Micro, we are committed to conducting business with respect for our suppliers and our customers, and with integrity. The Ingram Micro value of integrity provides that "**we employ the highest ethical standards, demonstrating honesty and fairness in every action that we take.**" **Offers or payment of bribes, kickbacks or gifts to win business or obtain favors conflicts with this value.** We expect our suppliers to willingly abide by these same values and employ these same standards, as summarized in this Supplier Code of Conduct.

When conducting business with Ingram Micro, you shall ensure compliance with the value of integrity as explained in this Supplier Code of Conduct; and in turn to apply this value in your relationship with your own suppliers who participate in the supply chain of goods and services to Ingram Micro.

By accepting any purchase order from Ingram Micro you agree to be bound by this Supplier Code of Conduct, including the value of integrity, which includes among others, the obligation to maintain accurate books and records of all purchase transactions with Ingram Micro and of your own implementation sufficient to demonstrate to Ingram Micro your compliance with this Supplier Code of Conduct, including the following:

- You agree to comply with all applicable laws, rules and regulations of the territories where you conduct business, in particular related to anti-bribery, employment/labor and the environment. As such you agree not to corruptly pay, authorize to pay or offer money or anything of value to any employee, official or representative of any government or public or international organizations, political candidates or political parties or the family of any such official for the purpose of obtaining or retaining business, or securing an improper advantage. This applies to both direct and indirect payments, to any third party or intermediary where there is reason to believe that it will be passed on for the foregoing purpose. Although corruption laws often apply only to bribes to public officials, Ingram Micro policy also prohibits the direct or indirect payment of bribes to commercial customers or to vendor employees to obtain or retain their business or influence their decisions.
- You agree to obtain and maintain valid all licenses, permits, authorizations or registrations required under the applicable laws and regulations of the territories where you conduct business.
- You understand that Ingram Micro prohibits its associates from soliciting gifts and entertainment from present or prospective suppliers. Such associates may only accept gifts, entertainment or other courtesies that are not excessive and are consistent with reasonable standards in the business community and compatible with Ingram Micro policies.

In addition and from time to time, Ingram Micro may be under an obligation with one of its customers to 1) abide by such customer's code of conduct and 2) to apply it to its business dealings with you. In such case, Ingram Micro will inform you accordingly and, by accepting any purchase order from Ingram Micro, you agree to be bound by such Ingram Micro customer's code of conduct.

If you have any legal or ethical issue involving Ingram Micro or its associates that you would like Ingram Micro to consider or resolve, you can do so by contacting the Ingram Micro Hotline as follows:

➤ **North America**

To Reach the Hotline On-Line, visit: <http://www.safe2say.net/IM.htm>.

To Reach the Hotline by Telephone: Dial 1-877-INGRAM2 (877-464-7262)

INGRAM MICRO SUPPLIER CODE OF CONDUCT

Latin America

To Reach the Hotline On-Line, visit: <http://www.safe2say.net/IM.htm>.

To Reach the Hotline by Telephone: Dial one of the toll-free access numbers below and then 1-877-INGRAM2 (877-464-7262)

Country	Toll-free number
Argentina	0-800-555-4288 or 0-800-222-1288
Brasil	0800-890-0288 or 0800-888-8288
Chile	800-225-288
Chile — para operadora de idioma español	800-360-312
Costa Rica	0800-0-114-114
Ecuador	1-999-119 or 1-800-225-528
Ecuador — para operadora de idioma español	1-800-999-199
El Salvador — para operadora de idioma español	800-1785
México	01-800-288-2872 or 001-800-462-4240
México — para operadora de idioma español	01-800-112-2020 or 001-800-658-5454
Perú	0-800-50-288
Perú — para operadora de idioma español	0-800-50-000
República de Panamá	00-800-001-0109

➤ **EMEA**

To Reach the Hotline On-Line, visit: <http://ingrammicro-europe.safe2say.eu>

To Reach the Hotline by Telephone: Dial 00-800-4410-0005, except in the following countries:

Country	Toll-free number
Hungary	06-800-13315
Portugal	8008 14144
Switzerland	0800-800016
Israel	00 1 877-464-7262

INGRAM MICRO SUPPLIER CODE OF CONDUCT

➤ **Asia Pacific**

To Reach the Hotline On-Line, visit: <http://www.safe2say.net/IM.htm>.

To Reach the Hotline by Telephone: Dial one of the toll-free access numbers below and then 1-877-INGRAM2 (877-464-7262)

Country	Toll-free number
Australia	1-800-881-011 (Telstra)
	1-800-551-155 (Optus)
Bangladesh	157-0011
China — for a Mandarin speaking operator	10810
China — from Hong Kong	800 96 1111
China — from northern China, the Beijing region	108-888
China — from southern and central China, the Shanghai and Guangzhou regions	108-11 or 800-96-1111
Hong Kong	800-93-2266
India	000-117
Malaysia	1-800-80-0011
New Zealand	000-911
Pakistan	00 800 01001
Singapore	800-011-1111 or 800-001-0001
Sri Lanka	430-430
Thailand	1-800-001-33 or 001-999-11111
The Philippines	105-11
The Philippines — for a Tagalog speaking operator	105-12