

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:

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Dial one of the toll-free access numbers below and then, at the prompt, dial 877 - 464-7262.

Country	Toll-free number
Austria	0-800-200-288 or 0-800-291-870
Belgium	0-800-100-10 or 0-800-770-04
Bulgaria	00-800-0010
Denmark	800-100-10 or 808-828-09
Finland	0-800-11-0015
France	0-800-99-0011 or 0-800-99-0111 or 0-800-99-1011 or 0-800-99-1111 or 0-800-99-1211 or 0-805-701-288 or 0-800-90-2500
Germany	0-800-225-5288
Hungary	06-800-011-11 or 06-800-1799
Israel	1-80-922-2222 or 1-80-933-3333 or 1-80-949-4949 or 1-809-21-4405
Italy	800-172-444
Luxembourg	800-201-11
Netherlands	0-800-022-9111 or 0-800-022-6174
Norway	800-190-11
Portugal	800-800-128 or 800-812-499
Spain	900-99-0011 or 900-99-1498
Sweden	020-799-111
Switzerland	0-800-890-011 or 0-800-562-907
United Kingdom	0-500-89-0011 or 0-800-89-0011 or 0-800-032-8483