



# **MODERN SLAVERY STATEMENT FY2024**

**Ingram Micro Pty Ltd**  
**ABN 45 112 487 966**

## Introduction

1. This is the fifth Modern Slavery Statement issued by Ingram Micro Pty Ltd, as a reporting entity pursuant to the Modern Slavery Act 2018 (Cth).
2. Our Statement covers all of the 7 mandatory criteria for reporting as set out in section 16 of the Modern Slavery Act, which are as follows:
  - identity of the reporting entity;
  - the reporting entity's structure, operations and supply chains;
  - the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls;
  - the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes;
  - how the reporting entity assesses the effectiveness of these actions;
  - (if applicable) the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement), and
  - any other relevant information.

### Criterion 1: Identify the reporting entity.

3. This modern slavery statement ("**Statement**") is produced by Ingram Micro Pty Ltd, ABN 45 112 487 966, 61 Dunning Avenue, Rosebery, NSW 2018 (referred to as "**we**", "**us**", "**our**", "**Ingram Micro**" in this Statement).
4. Ingram Micro is a reporting entity under the Commonwealth *Modern Slavery Act 2018* (Cth) ("**Modern Slavery Act**") and this Statement is submitted and published for the period commencing 1 July 2023 and ending 31 December 2024 ("**Reporting Period**") to coincide with the financial reporting period for Ingram Micro for 2024 being 1 January 2024 to 31 December 2024.
5. Ingram Micro fully supports the aims of the Modern Slavery Act and makes this statement in accordance with section 13 of the Modern Slavery Act, as a single reporting entity.

### Criterion 2: Describe the reporting entity's structure, operations and supply chains.

#### ***Our Structure***

6. Ingram Micro is an Australian proprietary company that is limited by shares and incorporated in Victoria, Australia.
7. Ingram Micro is a subsidiary of Ingram Micro Inc., which is incorporated in the United States and is one of the world's largest distributors of information technology products and services.
8. Ingram Micro does not own or control any trading subsidiaries.

### ***Our Operations***

9. Ingram Micro is a major trade-only distributor of information technology products and services, operating through a number of product divisions catering to different sectors of the Australian market.
10. Our core distribution business involves the purchase of products manufactured by other entities and the sale of those products to our wide range of customers, including brick and mortar retailers, online retailers, and corporate resellers.
11. Ingram Micro's operations do not involve manufacturing or it contracting to manufacture any information technology products or any other goods.
12. We operate in Australia out of offices located in New South Wales ("NSW"), Queensland and Victoria and a warehouse space for distribution of products located in Eastern Creek, NSW.
13. Ingram Micro employs approximately 650 staff across Australia.

### ***Our Supply Chains***

14. Ingram Micro procures hardware and software technologies for distribution and resale into the Australian market to fulfil and support our customers' needs.
15. Our supply chain also includes goods and services required to support our sales, marketing, promotions, and day-to-day operational needs.
16. Our largest (by value) hardware and software suppliers have corporations registered in Australia with their headquarters in the USA or China.
17. Ingram Micro has supplier agreements in place to ensure mutual understandings of requirements between both parties and these agreements are either evergreen or for a certain fixed term. These agreements outline pricing structures and payment terms, shipping and delivery terms or Incoterms, purchasing and returns issues and considerations, and legal requirements of the agreement including an obligation to comply with modern slavery requirements in business operations and the supply chain.

### **Criterion 3: Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.**

18. In this section, following the Commonwealth Guidance, we identify the 'risks of modern slavery practices', meaning the potential for Ingram Micro to 'cause', 'contribute to', or 'be directly linked to' modern slavery through our operations and supply chains.
19. With reference to the Commonwealth Guidance, we have identified the following key risks within its supply chain:
  - a. **Sector and industry risks:** Certain sectors and industries may have modern slavery risks because of their characteristics, products, and processes. Electronics has been identified as a high-risk industry worldwide. We acknowledge and understand that our hardware and software procurement and supply chains can pose a risk of modern slavery.

- b. **Product and services risks:** Certain products and services may have modern slavery risks because of the way they are produced, provided or used. Electronic goods which include laptops, computers and mobile phones have been identified by the Global Slavery Index 2023 as products presenting high risks of being implicated of modern slavery.
  - c. **Geographic risks:** Some countries may have higher risks of modern slavery, including due to poor governance, weak rule of law, conflict, migration flows and socio-economic factors like poverty. Australia is recognized as one of the countries recognized as taking material action in relation to combatting modern slavery and is not a high risk country for prevalence of modern slavery. However, we recognise that some countries may have higher risks of modern slavery. The Global Slavery Index 2023 indicates that electronic goods which includes laptops, computers and mobile phones, particularly those sourced from some countries such as India and China may present risks of being implicated in modern slavery.
20. Based on a high level analysis of our top suppliers that account for approximately 85% of our supply spend, we were able to confirm that:
- a. The vast majority of Ingram Micro's suppliers have published their own Modern Slavery Statements (or foreign entities that have provided an equivalent statement in that entity's jurisdiction) that addressed the mandatory criteria outlined in paragraph 2 above or set out the systems, controls, due diligence, policies and training the corporation had in place to mitigate against the risk of modern slavery in their operations and supply chains.
  - b. Of the remaining suppliers for which we could not locate modern slavery statements and/or were not required to publish modern slavery statements, the larger suppliers had published a Code of Conduct or Policy that outlined addressed modern slavery, provided an ethics hotline and outlined the standards applicable to their business and expected of their suppliers.

**Criterion 4: Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.**

***Ingram Micro global approach***

- 21. At a global level, Ingram Micro Inc (the parent company of Ingram Micro) conducts assessments to identify modern slavery risks in the operations and supply chains of Ingram Micro Inc and its subsidiaries.
- 22. In taking a global approach to addressing modern slavery risks and issues, Ingram Micro complies with the following corporate policies of Ingram Micro Inc which work together to manage the risk of modern slavery within our own organisation and our supply chain:
  - a. **Ingram Micro Code of Conduct** – This is the cornerstone of our compliance program. The code reflects our commitment to conducting business in alignment with our company's Tenets of Success; i.e. Results, Integrity, Imagination, Talent, Responsibility and Courage. The goal of this Code of Conduct and related policies is to provide ethical guidance to Ingram Micro associates as to how they are expected to behave.

- b. **Supplier Code of Ethics** – At Ingram Micro, we recognise the importance of engaging our supply chain partners in our social responsibility efforts. In 2017, we introduced a Supplier Code of Ethics in alignment with the code of conduct of the Responsible Business Alliance.
  - c. **Ingram Micro Global Human Rights Policy** – This policy is designed to comply with, and support compliance with, the California Transparency in Supply Chains Act, the UK Modern Slavery Act, the Australian Modern Slavery Act, the requirements of Federal Acquisition Regulations 52.222-50 and 52.222-56 and the E.U. Non-Financial Reporting Directive.
23. Ingram Micro provides Ethics and Compliance training to all of its associates upon joining the company and associates are also required to complete Ingram Micro's Global Code of Conduct Training at regular intervals.
24. **The Ingram Micro Hotline** – This Hotline is available to all Ingram Micro associates and is operated by an independent third party. The purpose of this Hotline is to encourage and foster a culture of reporting of any known or suspected breaches of the Code of Conduct or any other illegal or unethical business practice.
25. Ingram Micro continues to have a zero-tolerance policy for retaliation to ensure that any concerns relating to modern slavery will be raised, without any fear of retaliation for raising a concern.

#### ***Australian specific initiatives***

26. Ingram Micro has previously conducted questionnaires of many of its suppliers and based on our high-level analysis to their responses to our modern slavery self-assessment questionnaires, and those suppliers identified that they have no modern slavery occurring in their own operations and supplier chains.
27. Ingram Micro continues to conduct pre-employment screening of potential employees, Ingram Micro continues to verify and ensure that individuals meet applicable age requirements. Ingram Micro also follows all applicable wage and labour laws, including minimum wage, overtime and maximum hour rules and reviews the requirements on a regular basis.
28. Ingram Micro's standard distribution agreement contains Compliance with Laws provisions that require the parties to comply with all applicable laws, including but not limited to the Modern Slavery Act.
29. Employees of Ingram Micro Australia are required to undertake anti-modern slavery training to help identify modern slavery risks in our supply chain and to become more aware of the different types of modern slavery around the world. We have an anti-modern slavery policy in place which complements the existing global Human Rights Policy and procedures to help address and mitigate the risk of modern slavery in our supply chain.

30. Ingram Micro has a Modern Slavery Prevention Policy which is available to all employees and show its commitment to acting ethically and with integrity in its business and to implement and monitor effective systems and controls to ensure Modern Slavery is not taking place in its own business operations and to minimise the risk of Modern Slavery occurring in its supply chains.
31. A review of our current key suppliers indicate that they are well-known global brands that have presence in Australia through Australian corporate entities that have published their own Modern Slavery Statement (or foreign entities that have provided an equivalent statement in that entity's jurisdiction).

**Criterion 5: Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks.**

32. Based on our high level analysis of supplier responses to our self-assessment questionnaire, none of those suppliers identified modern slavery occurring in their supply chains.
33. In addition, the Ingram Micro Hotline and other complaint avenues in Australia were monitored and it was confirmed that no modern slavery issues were raised relating to Ingram Micro or its supply chain.
34. Many of our key suppliers are well-known major brands and have published their own Modern Slavery Statements in Australia (or an equivalent modern slavery statement in their jurisdiction)

**Criterion 6: Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement).**

35. This Criterion is not relevant for Ingram Micro as we do not own or control any other trading entities and are not making a joint statement. Accordingly, we are not required to consult with any other entities in giving this Statement.


**Criterion 7: Provide any other relevant information.**

36. Ingram Micro's current roadmap for FY2025 includes:
  - a. Continue educating new and existing employees on modern slavery risks and Ingram Micro policies that relate to modern slavery and human rights.
  - b. Continue to monitor our supply chain including by reviewing the adequacy of the modern slavery initiatives implemented by our major suppliers.
  - c. Monitor and investigate any reports made in relation to modern slavery on our hotline.
  - d. Continue providing Australian specific training to Associates on Modern Slavery to raise awareness of modern slavery risks and compliance.

### Approval of this Statement

1. This Statement is made pursuant to section 13 of the Modern Slavery Act and has been approved by written resolution of the board of directors of Ingram Micro Pty Ltd on 6 February 2025.

The Board has authorised Tim Ament as a Director of Ingram Micro Pty Ltd to sign this Statement on behalf of Ingram Micro Pty Ltd.

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Tim Ament

Director and Chief Country Officer  
For and on behalf of Ingram Micro Pty Ltd  
Date: 16 February 2025