



# **MODERN SLAVERY STATEMENT FY2020**

**Ingram Micro Pty Ltd**

**ABN 45 112 487 966**

## Introduction

1. This is the first 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. In drafting this Statement, we consulted the 'Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities' published by the Commonwealth Government ("**Commonwealth Guidance**") to help inform and guide our approach.

### 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 financial year ending 30 June 2020.<sup>1</sup>
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 others 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 contracting to manufacture any information technology products or any goods for that matter.

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<sup>1</sup> This modern slavery statement was amended on 12 December 2023 to reflect the correct reporting period of 1 July 2019 to 30 June 2020.

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 618 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 hardware and software suppliers by value are based in China and the USA.
17. We have 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.

#### **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. In this reporting period, Ingram Micro has completed an initial scoping exercise of identifying key areas of modern slavery in our operations and supply chain, in particular, we sought to identify those suppliers who may be considered high risk.
20. In order to appraise modern slavery risk areas, we referred to the specific known risk factors and indicators outlined in the Commonwealth Guidance.
21. With reference to the Commonwealth Guidance, we have identified the following key risks:
  - 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 pose a high risk.
  - b. **Product and services risks:** Certain products and services may have high 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 2018 as products presenting high risks of being implicated of modern slavery, and more so if they are sourced from Malaysia and China.
  - 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. We recognise that some countries may have

higher risks of modern slavery. The Global Slavery Index 2018 indicates that electronic goods which includes laptops, computers and mobile phones, particularly those sourced from Malaysia and China present high risks of being implicated in modern slavery.

22. In addition to conducting the above initial scoping exercise, we also reviewed a number of suppliers and note that many of our key suppliers are well-known major brands and have published their own Modern Slavery Statement (or an equivalent statement in that entity's jurisdiction).

**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***

23. 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.
24. 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.
25. **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.
26. Ingram Micro has a zero-tolerance policy for retaliation. In other words, Ingram Micro policy protects its associates from any and all retaliation, disciplinary action or other adverse employment consequences if – in good faith – associates report a suspected legal or ethical compliance violation or conflict of interest – irrespective of whether the suspicion turns out

to be valid. In doing so, we strive to ensure that any concerns relating to modern slavery will be raised, without any fear of retaliation for raising a concern.

***Pre-employment screening***

27. During pre-employment screening of potential employees, Ingram Micro continues to verify and ensure that individuals meet applicable age requirements. Ingram Micro follows all applicable wage and labour laws, including minimum wage, overtime and maximum hour rules.

***Regular compliance training***

28. 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.

***Specific modern slavery clauses in key contracts***

29. 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.

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

30. Going forward, Ingram Micro has developed a roadmap for future improvement to include:
- a. preparing a Modern Slavery Policy which will, amongst other things, establish a process for regular review of actions taken by Ingram Micro to assess, mitigate and address modern slavery risks; this policy is intended to complement the existing global policies and procedures we have in place.
  - b. continuing to conduct our supply chain due diligence by extending the modern slavery questionnaire to our customers, including brick and mortar retailers, online retailers, and corporate resellers to further understand whether there are any modern slavery risks in the supply chains of our customers.
  - c. setting up an annual senior management review of Ingram Micro's response to modern slavery.
  - d. conducting internal audits or monitoring of the number of contracts that include modern slavery clauses.
  - e. conducting internal audits or monitoring of the number of modern slavery training and awareness-raising programs delivered.
  - f. monitoring the number of key suppliers who have been audited via a self-assessment questionnaire for modern slavery risks.
  - g. continue to monitor modern slavery concerns raised via Ingram Micro Hotline and to assess and ensure that there is ongoing prompt remediation of any critical modern slavery related issues raised.

**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).**

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

32. Whilst Criterion 6 is not relevant for Ingram Micro, Ingram Micro has consulted Ingram

Micro Inc. in preparing this Statement.


33. Ingram Micro Inc. is required to comply with modern slavery laws in other jurisdictions and has published a statement against slavery and human trafficking under the UK Modern Slavery requirements. Ingram Micro Inc. and all of its subsidiaries strongly support the eradication of slavery and human trafficking. Our statement on these issues in compliance with the UK Modern Slavery Act of 2015 can be accessed [here](#).

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

34. The COVID-19 pandemic has posed significant challenges for supply chains globally. We have needed to dedicate time and resources to deal with other immediate consequences of COVID-19 on our business, which has resulted in less time and resources available in this reporting period to address modern slavery risks in great detail.
35. Given the impact of COVID-19 on our operations, some of our proposed risk assessment measures, such as targeted surveys have only covered manufacturers of hardware and software technologies only and targeted surveys covering resellers have been deferred to our second reporting year.

**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 20 July 2021.
2. The Board has authorised Timothy Mark Ament, Senior Vice President and Chief Country Executive and Director of Ingram Micro Pty Ltd to sign this Statement.

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Timothy Mark Ament  
Senior Vice President, Chief Country Executive and Director  
20 July 2021  
Revised 12 December 2023<sup>2</sup>

For and on behalf of Ingram Micro Pty Ltd

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