

# Rules of Procedure for the Grievance Mechanism Pursuant to Sec. 8 (2) of the German Supply Chain Due Diligence Act

## 1. Preamble

Ingram Micro Distribution GmbH ("**Ingram Micro Germany**") is committed to complying with all applicable laws, regulations, and human rights principles while also safeguarding the environment. Ingram Micro Germany's success is interconnected with its commitment to ethical behavior. Ingram Micro Germany has established an extensive range of measures to safeguard this commitment, which are outlined in the Policy Statement on the Human Rights Strategy.

Ingram Micro Germany cultivates a culture of open communication, where employees, direct and indirect suppliers, as well as individuals impacted by Ingram Micro Germany's economic activities or those of Ingram Micro Germany's suppliers, or their representatives, can freely ask questions or report potential instances of misconduct without fear of retaliation. Ingram Micro Germany strongly encourage everyone to engage in respectful and timely dialogue regarding any issues or concerns they may have.

This proactive approach serves as an early-warning system, enabling Ingram Micro Germany to address emerging risks or violations promptly and effectively. Through the implementation of suitable measures such as preventive measures or remedial actions, Ingram Micro Germany aims to mitigate or resolve issues at an early stage.

Ingram Micro Germany has established a grievance mechanism that allows individuals to easily report human rights and environmental risks as well as violations of obligations related to human rights or environmental due diligence under the SCDDA. These risks and violations may arise from the economic activities of Ingram Micro Germany or its direct and indirect suppliers. The grievance mechanism is accessible to all individuals, including potentially affected parties, employees, and others throughout the supply chain.

Grievances received by Ingram Micro Germany will be taken into account during risk analysis and the implementation of preventive measures and remedial actions, in accordance with applicable laws and regulations such as the SCDDA. Ingram Micro Germany acknowledges the importance of addressing these grievances and incorporating the outcomes of the grievance procedure into its decision-making processes.

These rules of procedure aim to provide clear and transparent information about the key characteristics, accessibility, process flow, and responsibilities related to the grievance mechanism, as mandated by Section 8(2) of the SCDDA.

## 2. Who can submit a Grievance?

Everyone can report potential violations through Ingram Micro Germany's grievance mechanism, including Ingram Micro Germany employees, direct and indirect suppliers, and those impacted by the economic activities of Ingram Micro Germany or its suppliers, including their representatives such as works council or NGOs.

## 3. No Retaliation

Ingram Micro Germany's policy unequivocally condemns retaliation. One of Ingram Micro's key principles is called the "Sunshine Rule", because it sheds light on potential violations in order to correct them. Ingram Micro also has a zero-tolerance policy for retaliation, so rest assured, you will not be punished for voicing concerns in good faith. Ingram Micro strictly prohibits any form of retaliation by its employees or third parties, including direct and indirect suppliers, against individuals who submit grievances in good faith or assist in the submission process. Retaliation is considered a serious offense and may result in disciplinary measures, including dismissal.

Ingram Micro Germany will take appropriate measures to leverage its influence and prevent or address any instances of retaliation exerted by third parties.

## 4. What can be reported?

Ingram Micro Germany's grievance mechanism is comprehensive and can be used to report any potential violations of applicable laws and regulations, risks or violations related to human rights or the environment, whether they occur within the supply chain or in relation to Ingram Micro Germany's policies and guidelines.

This includes, *inter alia*, (suspected) incidents in Ingram Micro Germany's own business area as well as along its supply chain of

- human rights or environmental risks or violations,
- occupational health and safety,
- contamination of soil, water, air and excessive use of water,
- conflicts of interests,
- bribery or kickbacks,
- harassment,
- discrimination, and
- retaliation.

Human rights or environmental risks or (imminent) violations may in particular relate to

- prohibition of child labor,
- prohibition of forced labor and all forms of slavery,
- disregard of occupational health and safety and work-related health hazards,
- disregard of freedom of association, freedom of organization and the right to collective bargaining,
- prohibition of unequal treatment in employment,
- prohibition of the withholding of a fair wage,
- destruction of natural resources (soil change, water pollution, air pollution and harmful noise emissions or excessive water consumption) through environmental pollution,
- unlawful eviction of land rights and water,
- prohibition of hiring or using private/public security forces that may cause harm due to lack of instruction or control,
- prohibited production, use and/or disposal of mercury (Minamata Convention),
- prohibited production and/or use of substances within the scope of the Stockholm Convention (POPs), as well as non-environmentally sound handling of waste containing POPs,
- prohibited import/export of hazardous waste as defined by the Basel Convention.

## 5. How to submit Grievances?

Ingram Micro Germany has implemented several reporting channels which are available 24/7:

- Via Ingram Micro Germany Hotline website, available at:  
<https://secure.ethicspoint.com/domain/media/en/gui/92658/index.html>

- Per Post:

Ingram Micro Distribution GmbH  
Attn: Product Compliance Department  
Heisenbergbogen 3  
85609 Dornach b. Aschheim/Munich

Grievances can be submitted anonymously. The grievances will be handled confidentially in line with applicable laws and regulations.

The grievance mechanism is free of charge for reporters.

## 6. Who handles the Grievances?

The handling of grievances will be carried out by the designated person at Ingram Micro Germany Product Compliance Department. This designated person is:

- impartial,
- independent, i.e., not bound by instructions,
- bound by confidentiality,
- specifically trained, and
- equipped with resources to appropriately investigate the grievance.

The designated person will handle the grievance with independence, objectivity, and impartiality.

## 7. What happens once the Grievance has been submitted?

Upon submission of a grievance, you will receive a receipt of confirmation. If you used the online reporting platform, you will also be provided with an access number and password that you created during the grievance submission process. These credentials will enable you to track the status of your grievance and engage in ongoing communication with Ingram Micro Germany at your convenience.

### ***Responsibilities***

Upon submitting your grievance, it will promptly be forwarded to the responsible designated person at Ingram Micro Germany for thorough review. All grievances received by Ingram Micro Germany are handled in accordance with relevant laws, regulations, internal policies, and procedures, with due consideration given to the rights of the individuals involved.

### ***Immediate measures***

If necessary due to the nature of the grievance, the designated person will take immediate measures with the purpose to end or mitigate (suspected) risks or violations.

### ***Plausibility check and handling of the grievance***

Upon receipt of the grievance, the designated person will diligently assess its plausibility and, if required, undertake additional fact-finding measures in accordance with internal policies. The designated person will reach out to the reporter to elaborate the facts. Throughout the grievance process, the reporter will be appropriately involved and may contribute to the development of preventive measures or remedial actions, as deemed necessary.

In the event that the grievance cannot be substantiated, the designated person will proceed to close the case and promptly notify the reporter of the outcome.

### ***Preventive measures and remedial actions***

Should the outcome of the grievance procedure justify it, Ingram Micro Germany will develop and implement suitable preventive measures or remedial actions, which may include personnel-related measures, in order to prevent, resolve, or mitigate the identified risk or violation.

### ***Evaluation and conclusion of the grievance procedure***

The designated person will communicate the outcome of the grievance procedure to the reporter and, when appropriate and feasible, evaluate it together.

The grievance procedure will be considered concluded once the identified risk or violation has been adequately addressed and remedied.

## **8. How long is the Grievance Procedure?**

Ingram Micro Germany strives to address and resolve grievances in a timely manner, recognizing that the duration of the process may differ based on the specific circumstances and complexity of each case.

The designated person will ensure regular and adequate communication with the reporter, providing updates on the progress of each step. In any case, the reporter will be informed of the progress no later than three months from the initial submission, and subsequently every three months thereafter.

## **9. Confidentiality, Data Protection and Documentation**

The designated person, along with all individuals involved in the grievance handling process, are bound by strict confidentiality obligations. Access to information is limited and will only be disclosed to individuals with a genuine need-to-know in order to effectively address the grievance or fulfill legal obligations of Ingram Micro Germany.

Ingram Micro Germany adheres to applicable laws and regulations concerning the collection, processing, and storage of personal data. As per relevant laws and regulations, Ingram Micro Germany is required to document the grievance mechanism and each grievance procedure. Sec. 10 (1) SCDDA applies.

## **10. Review of Effectiveness**

Ingram Micro Germany will conduct an annual evaluation of the effectiveness of the grievance mechanism, and conduct ad hoc reviews as needed. If deemed necessary, appropriate measures will be taken to enhance and improve the grievance mechanism.

The rules of procedure have been adopted on 15 December 2023, by the management of Ingram Micro Germany, and will enter into force on 1 January 2024.