KEY POINTS TO FOSTER A CULTURE OF COMPLIANCE & ETHICS AT YOUR COMPANY

- Consistency between your compliance plan and its implementation in the company:
  - The Department of Justice is targeting corporations for criminal and civil wrongdoing:
    - Attorney General Loretta Lynch announced DOJ collected $23.1 billion in civil and criminal actions in the fiscal year ending Sept. 30, 2015
    - The Attorney General specifically singled out financial institutions, environmental cases, and the health care industry
    - The Deputy Attorney General issued a memo on Sept. 9, 2015 concerning individual accountability for corporate wrongdoing

- The prosecution of corporations and corporate employees is a priority of DOJ
  - More important than ever to foster a culture of compliance within your organization
  - Ethics vs. Compliance
  - Aspirational vs. Legally necessary
  - Our mission is to promote the highest level of integrity
  - "The goal of our company is to do what is right"
KEY POINTS TO FOSTER A CULTURE OF COMPLIANCE & ETHICS AT YOUR COMPANY

- Ensure consistency between your compliance plan and its implementation within the company
  - Review compliance plan at regular intervals
  - Are there apparent gaps
  - Is the company failing to comply in some manner that is legally required
- Prosecutors will zero in on inconsistencies, gaps, and failures to comply
  - Commitments not honored, promises not kept are fodder for the investigators
  - Extremely important evidence in building a case
  - Difficult to defend failure to follow a company’s own internal directives

KEY POINTS TO FOSTER A CULTURE OF COMPLIANCE & ETHICS AT YOUR COMPANY

- Providing innovative training to the employees every year giving them tools to mitigate company risks and identify new risks that business units might be facing. Some examples of different initiatives that are usually well accepted by employees are following:
  - Using clickers during compliance trainings to measure learning on company’s policies and compliance controls, document responses through graphics, gather opinions, and increase audience participation; ask for controversial issues anonymously and make sessions more interactive and fun
  - Using ethical dilemmas to help employees identify real-life scenarios of risk where they need to apply company’s existing policies and controls
  - Using short videos related to “Ethical Moments” on different compliance topics to guide employees on how to make the right decision
  - Using games to engage the audience and improve compliance acceptance within the company

KEY POINTS TO FOSTER A CULTURE OF COMPLIANCE & ETHICS AT YOUR COMPANY

- Mentioning to the employees what is the benefit of having an ethical culture:
  - Employees are more receptive when they recognize the benefits and guarantees of working for a company that prioritizes compliance
- Reminding associates that they represent the company when they make business decisions
- Conduct risk assessment periodically based on company’s risk profile
- Launch informational campaigns per policy during the year:
  - Periodic communications on company policies internally and externally such hotline campaigns and letter on the gifts and entertainment policy for customers and service providers during Christmas
KEY POINTS TO FOSTER A CULTURE OF COMPLIANCE & ETHICS AT YOUR COMPANY

- Getting involved Middle Management to promote compliance objectives and improve communication with employees regarding the compliance program:
  - Conduct Employee Survey
  - Conduct Exit Interviews
  - Hotline
  - Conduct Group Sessions or Coffee breaks with middle management

COMPLIANCE GAMES: LEARN WHILE YOU PLAY

[Image of a group of people in a meeting room]

COMPLIANCE GAMES: LEARN WHILE YOU PLAY

[Image of people engaged in a group session]

COMPLIANCE GAMES: LEARN WHILE YOU PLAY

[Image of a group of people in a meeting room]
Dear Ingram Micro Associate:

You are cordially invited to participate in our Ingram Micro Compliance Week 2015. During this week we will like to ensure our Compliance Policies and Values in an entertaining atmosphere, exciting contests and team competition. Best performers – individuals and teams will win great prizes. LET'S MAKE A DIFFERENCE AND SUPPORT YOUR TEAM TO WIN!

Below you can see our Agenda during this week and other fun activities that you can participate in order to get points to your team. Team Winner will get 2 tickets for Cine Bistro @ Dolphin Mall (each team member).

**Agenda**

<table>
<thead>
<tr>
<th>Day</th>
<th>Time</th>
<th>Session</th>
</tr>
</thead>
<tbody>
<tr>
<td>Monday Dec 14</td>
<td>3pm</td>
<td>Policies Coffee Break</td>
</tr>
<tr>
<td>Tuesday Dec 15</td>
<td>3pm</td>
<td>Ice Breaking Values</td>
</tr>
<tr>
<td>Wednesday Dec 16</td>
<td>3pm</td>
<td>Roundtable – Let’s about Compliance with Laura Paredes</td>
</tr>
<tr>
<td>Thursday Dec 17</td>
<td>3-3:30pm</td>
<td>Surprise Call</td>
</tr>
<tr>
<td>Friday Dec 18</td>
<td>3pm</td>
<td>Closing Event – Winners of the week and Prizes</td>
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</tbody>
</table>

Contests to participate during the week and get points to your team

- **SURVEY**
  - Complete Survey and obtain 5 points and also an Individual Prize for best performers
    - 1 Points

- **PHOTO/COLLAGE**
  - Submit your picture/collage with Ingram Micro Value you feel more identified and submit it through email.
    - 2 Points

- **VIDEO**
  - Submit your video with you and a Sign where you can show an Ingram Micro Value that you feel more identified and submit it through email.
    - 2 Points

- **MONDAY/TUESDAY/WEDNESDAY SESSIONS (3PM)**
  - Be part of each session with Laura Paredes to discuss main Ingram Micro policies during 30 minutes
    - 5 points

- **INGRAM MICRO JEDI COMPLIANCE**
  - Nominate your best peep for BEST JEDI COMPLIANCE @ Ingram Micro. We will choose 3 Winners with more votes on Friday – Closing Session
    - 5 points

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**THE END**