

# Supplier Integrity Principles



Strong relationships with our suppliers is a key to Tech Data's continued success. Our Supplier Integrity Principles outline the behaviors our suppliers should follow when doing business on behalf of and with Tech Data. In addition to these Principles, suppliers should obey all applicable laws and regulations.

Tech Data's values serve as the foundation for all of our business dealings and we expect our suppliers to share our views on the importance of ethical conduct. More information about our values and beliefs on ethical practices is available in our [Code of Conduct](#). By following these Principles and the law, we continue to build on our mutually beneficial partnerships and achievements.

## Applicability

Our Principles apply to all suppliers, vendors, contractors, agents, intermediaries and other similar parties that supply goods or services to Tech Data around the world. We expect our suppliers to embrace these Principles and communicate the expectations outlined in these Principles to their own suppliers and business partners.

## Reporting Information

If there is ever any doubt about the right course of action to comply with these Principles, please ask before acting. Suppliers can discuss their questions or concerns with their main point of contact at Tech Data or contact Tech Data's Ethics Line to make a report or ask a question:

Tech Data's Ethics Line: [Ethics Line](#)

Anyone that makes a report in good faith will be protected from acts of retaliation. Tech Data takes all reports seriously.

## Anti-Bribery and Anti-Corruption

Tech Data complies with all applicable laws related to anti-bribery and anti-corruption and expects our suppliers to do the same. Some of these laws include the U.S. Foreign Corrupt Practices Act (FCPA) and the United Kingdom Bribery Act (UKBA). These laws apply to dealings with the government, private individuals, and other companies.

We compete vigorously, fairly and always within the limits of the law. This means that we do not offer or accept anything of value for an unfair business advantage. We should be particularly careful when dealing with government officials, as there are special rules and regulations to consider.

Government officials can be, but are not limited to:

- Elected or appointed politicians.
- Candidates for political office.
- Employees at state-owned entities such as universities, hospitals, or utility companies.
- Employees at national, state, or local government agencies.
- Family members or close friends of government officials.

Bribes can include facilitation or "grease" payments that are smaller payments made to speed up an otherwise routine government task. Facilitation payments are illegal under certain anti-bribery laws and should not be paid.

If you witness or suspect corrupt actions in any way related to Tech Data's business, please speak up using the [Ethics Line](#).

## Conflicts of Interest

A conflict of interest occurs when a person's own interests unnecessarily interfere with their ability to make decisions that are in the best interest of their company. Both actual and perceived conflicts can be problematic and should be disclosed and avoided.

Some common examples of potential conflicts can include:

- Hiring or working for family members or friends.
- Receiving inappropriate gifts, travel, entertainment, or anything else of value.

## Conflicts of Interest *continued*

When you learn about a potential conflict of interest related to Tech Data or our employees, it should be disclosed so it can be handled appropriately.

Suppliers should only accept and provide gifts, travel, and entertainment that are reasonable, not lavish and do not violate Tech Data policies or the law. You should not accept or provide any gifts, travel, or entertainment that would inappropriately influence business decisions or provide an unfair business advantage. Avoid giving or accepting cash or cash equivalents, such as gift cards.

If you are not sure if something would be a violation of the Principles, please ask before acting.

## Human Rights and Workplace Safety

Suppliers are expected to support human rights and workplace safety. Suppliers should treat their employees fairly and prohibit inhumane or unlawful working conditions. Take precautions to ensure that workplaces are safe, sanitary, and free from any unnecessarily dangerous conditions.

Tech Data expects our suppliers' workforce to be free from any human rights violations and to comply with all relevant laws. Employment laws should be followed by all suppliers including those related to:

- Fair wage and hours.
- Minimum wage.
- Maximum hour and overtime rules.

Suppliers should not use forced, bonded, or involuntary labor and should respect employees' decisions regarding unions, collective bargaining, and other workers associations. Human trafficking and child labor are not tolerated.

Suppliers should be committed to complying with the disclosure, due diligence, and other applicable requirements of the U.S. Conflicts Mineral Law. Tech Data supports fair, safe, and respectful working conditions in its supply chain. If a supplier becomes aware of any breach of these Principles or human rights violations, they should alert their primary contact at Tech Data or make a report to the [Ethics Line](#).

## Harassment and Discrimination

We believe in workplaces that are free from discrimination and harassment. Discrimination based on race, religion, color, national origin, age, gender, disability, sexual orientation, or any other factor protected by law should be avoided. Suppliers should foster a diverse work environment that is free from harassment or discrimination.

All forms of harassment including bullying and sexual harassment are unlawful, against policies, and can lead to unproductive and harmful workplaces.

## Respecting the Environment and Communities

We respect the communities and natural environments where we operate. Suppliers should recognize that a healthy and sustainable environment is critical to our society, economy, business, and people. We strive to comply with all applicable environmental laws and regulations. We believe that our business should be conducted in a manner that embraces sustainability, recycling, and the use of renewable resources.

Laws and applicable policies relating to protecting the natural environment, sustainability, pollution, and corporate responsibility should be followed.

## Protection of Information

The decisions of Tech Data and suppliers need to be based on truthful, accurate, and timely information and records. All information involving transactions, revenue, expenses, marketing funds, rebates, and other activities should be properly recorded and should not be false or fraudulent. All accounting records need to reflect their true nature and not mask any activity that is against applicable policies or the law.

Confidentiality and the privacy of information are essential to the success of Tech Data. We expect our suppliers to protect all confidential information that is provided to them by Tech Data. Any personal, private, or sensitive information about employees or customers needs to be protected in accordance with applicable laws.