

SYNNEX CORPORATION SUPPLIER CODE OF CONDUCT

SYNNEX aligns itself with the guiding principles of visibility, velocity and value in order to achieve a maximum benefit to our customers, employees and shareholders. We deliver the finest products and services in the industry and treasure loyalty, teamwork, integrity, and hard work from all of our employees and business partners.

SYNNEX holds itself and its employees to our values, which we expect everyone to demonstrate including integrity, continuous learning, strong work ethic, quality of work, commitment, teamwork, execution and results, respect for the individual, and taking manageable risks. Within these parameters, we insist SYNNEX employees adhere to strict moral and ethical values, measured by one's conduct on a day-to-day basis, modeling our core values: sincerity, honesty, and candor. As such, offers or payment of bribes, kickbacks or gifts to win business or obtain favors are not tolerated as they conflict with our values, and we expect our suppliers to willingly abide by these same values and employ these same standards.

When conducting business with SYNNEX, you agree to comply with the SYNNEX value of integrity, as explained in this Supplier Code of Conduct. Further, you agree to apply this value to your own supplier relationships and agreements, if they supply to you for the SYNNEX chain of goods and services.

By accepting any purchase order from SYNNEX you agree to maintaining accurate books and records of all purchase transactions with SYNNEX, and maintaining records sufficient to demonstrate your compliance with this Supplier Code of Conduct. Specifically, you agree to maintain records of the following:

- Compliance with all applicable laws, rules and regulations of each and all of the territories where you conduct business, particularly related to employment/labor- including forced labor, anti-discrimination, anti-harassment, the environment, and anti-bribery. As such you agree to comply with the United States Foreign Corrupt Practices Act (FCPA) (as well as all other applicable laws based on the laws of each and all of the territories where you conduct business), and not to corruptly pay, authorize to pay or offer money or anything of value to any employee, official or representative of any government or public or international organization, political candidates or political parties or the family of any such official for the purpose of obtaining or retaining business, or securing an improper advantage. This requirement applies to both direct and indirect payments, to any third party or intermediary where there is reason to believe that it will be passed on for the foregoing purpose. Although corruption laws often apply only to bribes to public officials, SYNNEX policy also prohibits the direct or indirect payment of bribes to commercial customers or to vendor employees to obtain or retain their business or influence their decisions.

- Maintenance of all valid licenses, permits, authorizations or registrations required under the applicable laws and regulations of the territories where you conduct business.

- Compliance with the SYNNEX prohibition on its employees from soliciting gifts and entertainment from present or prospective suppliers. Such employees may only accept gifts, entertainment or other courtesies that are not excessive and are consistent with reasonable standards in the business community and compatible with SYNNEX policies.

Additionally, SYNNEX may be under an obligation with one or more of its customers to abide by such customer's code of conduct and to apply it to its business dealings with you. In such case, SYNNEX will inform you accordingly and, by accepting any purchase order from SYNNEX, you agree to be bound by such SYNNEX customer's code of conduct.

If you have any legal or ethical issue involving SYNNEX or its employees, you may report them by contacting the SYNNEX Hotline, as described on www.openboard.info/synnex